

March 10, 2015

To the City of Portland Planning Commission:

I am submitting comments regarding proposed comp plan changes in the Buckman neighborhood. I understand that these changes are for the underlying comp plan and not intended for current zoning. The three areas of proposed changes I am commenting on are:

- 14th and Stark
- the 1900 block between Alder and Washington and
- the blocks from 15th to 19th between Belmont & Morrison

14th & Stark

The proposal is to change the comp plan designation from R1 to CS on a currently non-conforming commercial property at 1403-15 SE Stark. The current use for this lot is 1-story commercial creative space.

Stark Street east of 12th Avenue is a primarily residential street with a node of commercial development surrounding Washington High School. This commercial development consists of either 1-story commercial or 1-story commercial with 1-story residential above.

Changing this lot to CS would drastically change the character of this neighborhood commercial node, which is already being heavily impacted by the adaptive reuse of Washington High School. CS allows 4 stories of residential development, with no limit on residential development and no requirement to

develop the ground floor as commercial space. CS does not promote the development of residential units above commercial spaces, which would serve those residential units. CS is not the appropriate zoning for this location, because it is in conflict with Portland's desired goals of walkable neighborhoods.

The scale and massing allowed by CS also would disrupt the existing neighborhood. Immediately to the north of these lots are R2.5 single family residential backyards which would lose their access to sun and privacy. A more appropriate zoning would be CN1, or one of the new CM zones, still in the process of being defined. The intention of any proposed zoning change should be to encourage "...the provision of small scale retail and service uses for nearby residential areas...Development is intended to be pedestrian oriented and compatible with the scale of surrounding residential areas." [Title 33.130.030.A]

1900 Block between Alder and Washington

The western half of this block is proposed to be zoned from R5 to R2.5 to make it "match" the rest of the block. This zoning is being proposed despite the fact that 3 of the 5 properties (612 & 624 SE 19th & 1915 SE Alder) currently have single family or single family with an attic ADU uses on 5000 SF lots, and would then be out of conformance with the new underlying zoning. Two of the properties could not be subdivided to meet the new density requirements, unless flag lots were created, which would destroy the open space shared visually by all properties on the block.

The third property at 1915 SE Alder, which I own, could be

subdivided; however, doing so would destroy the historic relationship of the house to its garage, which is on the western half of the property. The house and garage were built in 1905 by Frank Keenan, the owner of one of the first bicycle shops in Portland and were deemed as a significant contributing property when a National Register Historic District was proposed for the neighborhood. The conversion of these 3 true R5 properties to R2.5 is not consistent with the current use, and would destroy the current block character in what it would allow. There are other half-blocks in the neighborhood, which are built to R2.5 density and which are keeping their R5 zoning. What would be appropriate is to correct the zoning for those properties and to not change zoning for properties which are currently conforming.

Blocks from 15th to 19th between Belmont & Morrison

These blocks are currently zoned a mix of R1, R2.5, CM and CS. The proposed zoning is all CS. As already discussed for 14th & Stark, CS zoning allows unlimited density of residential units with no requirement for providing commercial space on the ground floor. The end result will be monolithic buildings, built to zero setbacks, with a high density of small, high-rent units. They will be displacing family-friendly housing, affordable duplexes and quadruplex rentals, and some retail commercial and warehouses.

These blocks are currently between the Belmont-Morrison couplet and on the number 15 bus line. The end result of assigning CS zoning to this area will be to create 4 blocks of high density, high rent, small apartments unsuitable for families and with no guarantee that the necessary commercial spaces to support this high density of residential use will be developed. In addition, because CS zoning allows zero

property line development, with up to 4 stories 45 feet high, resulting development will divide the Buckman neighborhood visually and functionally in half, making a perceptual barrier between north and south Buckman. This will only reinforce the splitting of the neighborhood that occurs because these streets are designated collector streets and form a couplet.

I'd like to point out 1) that there is plenty of development density capacity west of 12th zoned Ex and 2) that the neighborhood elementary school is in north Buckman, and there are already issues with kids walking or riding their bikes safely to school. A more appropriate zoning change would be to support the existing single and multi family housing by leaving their zoning intact, changing the zoning of current non-conforming uses such as the telecom building at 17th, and then implementing zoning which will allow for a mix of residential and commercial for a truly walkable neighborhood that supports families and renters of all incomes.

Sincerely,

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