

**From:** Pete Adams [mailto:pete126@outlook.com]  
**Sent:** Thursday, April 07, 2016 6:48 PM  
**To:** Planning and Sustainability Commission <psc@portlandoregon.gov>  
**Subject:** Comprehensive Plan Testimony SE Henry Street

Re: Lots on SE Henry Street numbered: 5312, 5316, 5320, 5404, 5412, 5424, 5430, 5401, 5407, 5415, 5421, 5427, 5433

In the 2035 Comprehensive Plan, I am asking the City of Portland to remove the recommended single-dwelling 2,500 (R2.5) and restore single-dwelling 5,000 (R5) zone for the lots referenced above. There are compelling reasons for you to honor my request: 1) This dead end block is already mixed zoning with high density, and 2) public safety demands it.

#### 1: EXISTING HIGH DENSITY

This is a compact street about 500 feet long with 18 apartment/duplex units bordering SE 52nd Avenue (zoned R2) as well as the 13 single family homes referenced above. Three of these homes are flag lots, which add to housing density. This block is already highly dense and congested. It is at capacity. In fact according to 33.654.110.B of the code, dead end streets should only service 18 dwelling units. We already have 30 dwelling units and the City wants to add a potential 13 more? That is way over capacity for a dead end street.

In many ways this is what the City of Portland is looking for, density that is still livable. It offers affordable housing. There is diversity: ethnic diversity, age diversity, and there are many families with children. On-street parking is already at a premium, though, with apartment dwellers consuming much of the street parking space, especially nights and weekends. People find it very hard to enter and exit driveways at times because of the cars parked on the street. Tri-met has already classified this as a congested street and will not send its small LIFT vans to pick up a visually-impaired woman who lives here. Also, because of the nearby peak service transit corridor, builders will be allowed to remove off-street parking such as driveways when developing new construction. If you start dividing up lots and allow developers to eliminate off-street parking, the resulting congestion will turn a street that is livable into one that is a density nightmare.

#### 2: PUBLIC SAFETY

A major reason to deny this zoning change is that there is no turnaround at the dead end. The street ends abruptly in a block wall and tall chain link fence. It is an existing condition apparently allowed by the City of Portland in the past. Garbage trucks, large delivery trucks, and fire trucks have to back all the way down to SE 52nd and then try to back out onto a very busy street.

Current Fire Code prohibits this type of street for new development, and the City of Portland should not allow more density on a street that is substandard with regard to its own public safety code. The Portland Fire code states: "Dead end fire apparatus access roads in excess of 300 feet in length shall be provided with an approved turnaround (OFC 503.2.5 & D103.1)." This dead end block of SE Henry Street qualifies as an access road, and there is nothing anywhere along its length that meets approved turnaround standards of any type.

Planning staff has argued that adding fire sprinklers to any new construction will solve the problem. Yes, if the fire code violation is caught during the permitting process, the builder can appeal, and the Fire Marshal can agree to fire sprinklers as an alternative to the approved turnaround. That does not solve the access problem, and in fact, it increases the risk to people already living on this block when up-zoning to a denser R2.5. Adding fire sprinklers project by project in this situation is an inadequate piecemeal approach that increases density without solving the public safety issue because: a) the missing turnaround will not be built (houses are in the way); b) there will be more congested parking on the streets (see #1 above) for the fire trucks to maneuver around, which can slow response time; c) adding sprinklers does not address emergency situations that are not fire-related where fire trucks, ambulances, and police can all respond to an emergency situation and need access; d) the rest of the already tightly packed homes will not have a sprinkler system so they will still need rapid emergency access without congestion/access issues; and e) the only public safety criteria used by staff to evaluate for up-zoning was response time, but not having adequate fire apparatus access can slow response time.

The Fire Code is there for a reason, to protect life and property. Substituting fire sprinklers instead of adequate fire access turnaround on dead ends is not in the code. It is a compromise brought up in an appeal situation. Yes, it would be great for newly constructed homes on this street to have fire sprinklers, but that can be achieved with newly constructed homes in R5, if zoning is left as is, not just homes in R2.5. However, homes with sprinklers can still burn from the outside in, and by adding more homes on an already crowded street, that creates more homes that may need the attention of firefighters during an event and puts more people at risk because there is only one evacuation route on the dead end street.

Please do not up-zone these lots from R5 to R2.5. In fact, these lots should have the R2.5 designation completely removed from the Comprehensive Plan Map for the same reasons, and please do not approve the Staff Amendment for 5433 SE Henry Street and 5430 SE Henry Street (page 84 of Amendment Report, Map ID B110) for these reasons as well. You will not gain much in density by up-zoning because the houses are already packed tightly on very narrow lots or piggy-backed in flag lots. Up-zoning this dead end block to R2.5 will make an existing public safety hazard worse. It is unwise and irresponsible for the City of Portland to add more density on this substandard street.

Other substandard streets across the city were recommended for exemption from up-zoning (examples are: B94, B93, M75, B120, F68) or congestion was sometimes considered for down-zoning (B88, M51). Residential areas without public safety hazards or even no service considerations, such as Eastmoreland (M74) and Buckman (S21 and S22), were given proposed amendments to stop up-zoning or to down-zone. Please give this dead end block the same consideration. Make public safety, street congestion, and livability a priority and decide to deny the up-zone proposal for this little, dead end street.

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