

Doug Klotz  
1908 SE 35<sup>th</sup> Place  
Portland, OR 97214  
5-9-16

To: Katherine Schultz, Chair,  
Planning and Sustainability Commission

## **Comments on Pedestrian Issues in Mixed Use Zones Proposed Draft, March 2016**

Chair Schultz and Commissioners:

I support the provisions in the Proposed Draft that emphasize the development of a pedestrian friendly city. The continued restrictions on new drive-through facilities in 33.130.260 will help reduce the deleterious effects these have on the pedestrian experience. Mapping previously CG-zoned areas to the CM-1, CM-2 and CM-3 zones will increase the pedestrian-friendly districts of the city.

### **Ground Floor Window heights**

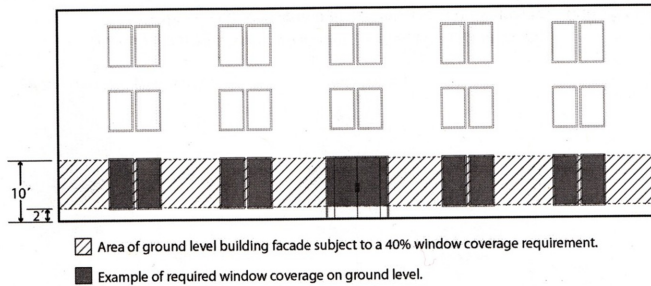
Likewise, I support the increase in requirements for Ground-Floor Windows in the Mixed Use Zones, from 25% to 40% of the ground floor wall area. Ground-floor Windows make a big difference for walking, giving pedestrians a view into stores and building lobbies, increasing interest and increasing personal safety by ensuring “eyes on the street” from those within the building.

I am concerned, however, that the requirement for a 4' high maximum for the bottom of windows is being removed from 33.130.230, C. The main purpose of the regulation is to allow pedestrians to see into stores, and for those inside to be able to see people on the outside, and see activities in the street and call for help when it is needed, as well as provide an interesting and varied pedestrian experience.

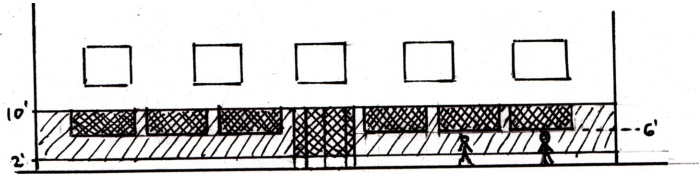
Without this maximum bottom height, there are many places where builders don't want to have windows, and will take advantage of this, resulting in windows with their sills at 6 feet, say, and extending to 10 feet height to achieve the required window area, while leaving pedestrians no connection to the life inside the building.

Staff contends the larger required percentage will often force the windows to reach down to the 4' level anyway. Here's their diagram from the proposal:

Figure 130-11  
Ground Floor Windows



Yet it doesn't take much imagination to see how a builder can use windows with their bottom at 6' above grade to satisfy the same requirement:



This example window, with a bottom at 6.5 feet and top at 8 feet, would count as a "Ground Floor Window" under the proposed regulation:

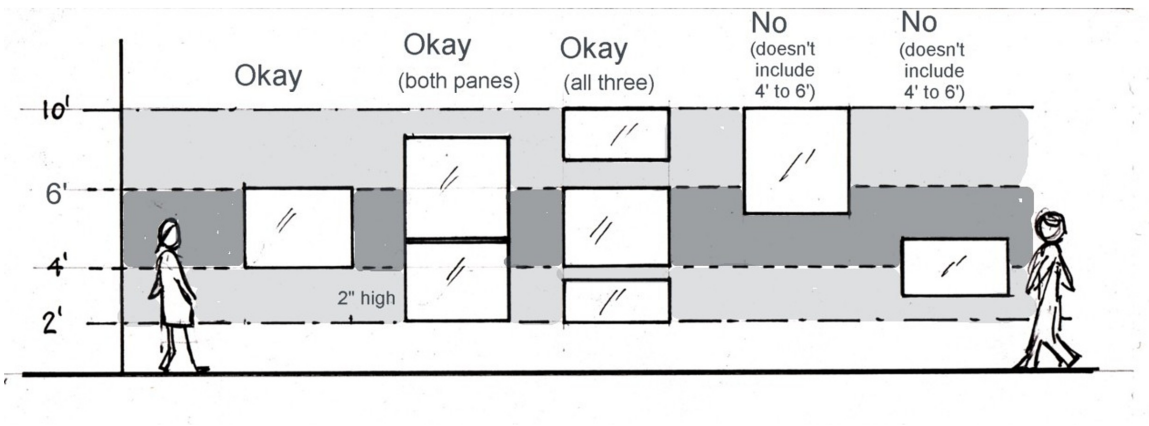


Apparently staff were worried that the 4' bottom requirement would prevent “transom” windows above the main windows from being counted toward the total:



Here’s one solution: Add this language to 33.130-230, C.:

“To qualify, a single window must have the bottom no more than 4 feet above the adjacent exterior grade, and the top no less than 6 feet above that grade. Other windows directly above and below this “qualifying” window also qualify, if between the 2’ and 10’ heights. Horizontal dividers (muntins) less than 2 inches high are allowed within any window.”



This language, while more complicated, allows the older pattern windows as well as modern window assemblies, while ensuring that windows are used within the critical height for people to see in. I think it’s worth it.

### **Screens and slats**

I also feel that elements in front of Ground Floor Windows, such as bars, slats or perforated metal screens likewise reduce pedestrian-friendliness and safety on commercial streets. These should be prohibited on Ground Floor Windows.



Slats over windows at 28<sup>th</sup> and Sandy.

I welcome the additional window percentage requirements in the Mixed Use Zones proposal, and urge the above changes or similar is made to ensure that people are able to see in at eye level on any window assembly counting toward the standard.

### **10' Setback on Civic Corridors in Eastern and Western pattern areas**

This requirement, in 33.130.215.B.1.a. seems to be the result of a misunderstanding of what makes a pleasant pedestrian environment, coupled with a plea for “more greenery”. This regulation requires buildings set back at least 10’ from the back of the sidewalk, but not that this area be all paved for pedestrians. So, it goes against principles of putting buildings up to the sidewalk so walkers can see in the windows and relate to the building. In addition, being applied in the Eastern and Western Pattern areas where the streets are already so wide that they feel hostile to pedestrians. Having PBOT require a right-of-way dedication to get a 15’ instead of 12’ sidewalk, would allow for bigger street trees in the walk, and more buffering area for pedestrians.

Instead, this misguided requirement will result in an interrupted landscape buffer between the pedestrian, and the building, instead of concentrating larger trees between the pedestrian and the street.

The effects of this type of requirement can be seen on SE Powell, which has had such requirement for decades:



This requirement should be removed, and efforts concentrated on getting a wider sidewalk requirement on Civic Corridors, whichever Pattern Area they are in, so that larger tree-wells fit within the sidewalk. There can be landscaping near the curb, but not separating the walkers from the commercial building frontage they want to access.

Thank you for your attention to these small details that make or break the pedestrian environment.

A handwritten signature in black ink that reads "Doug Klotz".

Doug Klotz

