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To: Planning and Sustainability Commission <psc@portlandoregon.gov>
Subject: PSC Mixed Use Zones Testimony

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Testimony on Mixed Use Zones Low Rise Commercial Storefronts - Division St.

To: Planning and Sustainability Commission
Chair Schultz and Commissioners:

As I have noted, the idea of the Low Rise Commercial Storefront downzoning across the city is the wrong way to achieve so many other the Comp Plan goals, but chief among them is the desire to concentrate dwellings in and around Neighborhood Centers, so residents can walk, bike and use transit for many of their daily trips. This concept of Low Rise areas, is the opposite of this, "hollowing out" the core of the Centers.

In this letter, I will point out some flaws in even following the standards laid out for these areas, with SE Division Street, from 35th to 37th as the example. Here is the area, outlined in blue, where CM-2 zoning will be replaced with CM-1, and a four-story limit replaced with 3-story.



1. Streetcar era storefronts not continuous on north side of street.

The Emerson House Alzheimers facility, built in 2000, is not really storefront, and much too new. The small storefront east of it is from 2005, and also not Streetcar era.



This building covers much of the block between 35th Pl. and 37th.

A few houses are added to the area as well, and are not storefronts. On this map, sites that are post-war are marked in blue, and those that are not storefronts are marked in black.



2. Significant building sites with older buildings on them are removed from the pool of Zoning capacity. The 10,000 s.f. sites at each end of this district, at 35th Place and Division (NW corner), and at 37th and Division (SE corner), are one-story buildings in single ownership, and would allow a property owner to feasibly add much needed housing along this stretch of Division St.

The bigger picture, though, is that Portland's housing crisis, as well as sound land use planning, call for greater density in Neighborhood Centers. If a few significant buildings should be preserved, (like the Oregon Theater), then the city should provide assistance in getting National Register protection for these buildings, and let needed development occur on less significant sites.

Thank you.

Doug Klotz