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Sent: Tuesday, May 17, 2016 6:51 PM

To: Manning, Barry <Barry.Manning@portlandoregon.gov>; Planning and Sustainability Commission <psc@portlandoregon.gov>

Subject: PSC Mixed Use Zones Testimony

To: The Planning and Sustainability Commission
Chair Schultz and Commissioners

In addition to my letter submitted May 10, 2016 and my testimony at the PSC hearing of May 10, 2016 I am submitting the following noted below.

I concur with Doug Klotz's comments and analysis described in his email below explaining why the proposed downzoning to CM1 as part of the Mixed Use Zones Project draft which includes the area between SE 35th and SE 38th within the Hawthorne District is not supportable and actually not needed.

As noted by Doug, "with the historic protections in place, and opportunities for more housing on several sites, this example shows that even well-known "vintage" districts are not necessarily appropriate for this Low-Rise Commercial Storefront downzoning scheme. There are opportunities to get needed density in this area without destroying any pre-war buildings, and which could actually enhance the district with needed residential vitality. The proposed downzoning is not needed and would be detrimental to many Comp Plan goals."

As mentioned in Ken Eiler's letter dated May 16, 2016, the draft proposal does not allow the wholesale of goods and limits building height to three stories. These new standards are problematic for a number of existing buildings. If the city is supportive of increasing jobs, supporting businesses and the growth of existing businesses, and encouraging more housing density, then allowing up to four stories and allowing the wholesale of goods would help to meet those goals.

Adjacent zoning of CM and R2.5 to the north of our property at 3621 and 3623 SE Hawthorne allows for building heights of 45' and 35' respectively. The existing structure behind our building appears to be about 40-45' in height. Nearby residential units are higher than 35' due to the way height is calculated and many are 40-45' in height.

I support the uses and heights allowed in the CS zone (current zoning of our property) and request that the PSC consider allowing four stories in any new overlay or zoning district proposed as part of this project.

Thank you.

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From: Doug X [<mailto:dougurb@gmail.com>]
Sent: Sunday, May 15, 2016 7:16 PM
To: psc@portlandoregon.gov
Subject: PSC Mixed Use Zones Testimony

Doug Klotz
1908 SE 35th Place
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April 15, 2016

To Planning and Sustainability Commission
Chair Schultz, and Commissioners:

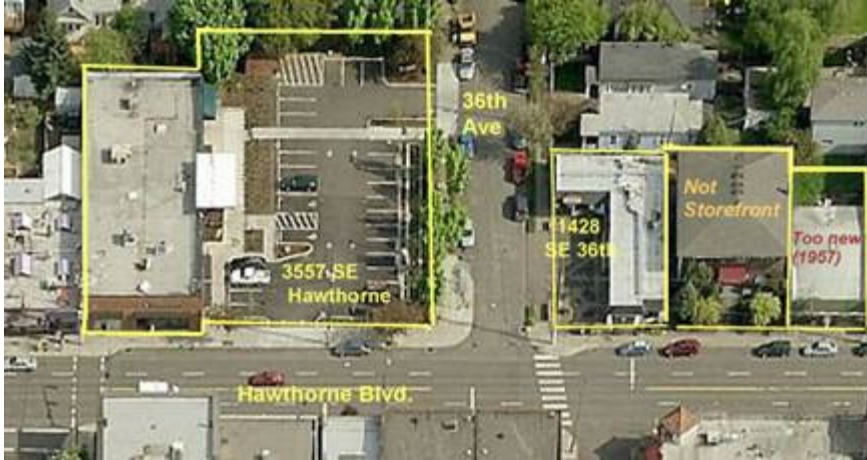
Here are my comments on just one of the 13 proposed Low Rise Commercial Storefront areas throughout the city, slated for downzoning from CM-2 to CM-1 in the Mixed Use Zones Project draft.

Comments on Mixed Use zones Hawthorne Low Rise Commercial area

The Low-rise Commercial Storefront “downzonings” are a bad idea in all 13 sites throughout the city, reducing housing capacity in the very place where the most housing should be built, in the heart of services, shopping and transit access. But, I will lay out as an example, why this downzoning is not a good idea nor is it needed, along Hawthorne Blvd. between 35th and 38th Ave. The downzone area is outlined in blue on this modified city map.

1. Key redevelopment sites are thwarted from reaching full potential.

Two spots stand out as likely redevelopment sites within the 35th to 38th. One is that large parking lot, and the building associated with it, at 3557 SE Hawthorne. This 23,500 sq.ft. site contains one building, with new exterior walls and one back wall from 1910. It is not a streetcar era building any more. 120 units could be built here in CM-2, but not in CM-1. (A smaller site across 36th has a 1957 building that does not fit the “streetcar” district, and the apartment house east of it, while old, does not contribute to the Storefront character.)



The other site is a row of plain storefronts, built 1948-1956, stretching from 38th west on the north side. While they are "storefronts", these do not have the detailing to fit the era, and could be replaced by a much larger, mixed use building, with storefronts at the same scale, but with 3 floors of needed housing above.



2. Significant Streetcar Era Historic buildings are already protected from removal.

The 1927 Bagdad Theater is on the National Register, but not part of the district. However, within the district, four buildings are on the National Register of Historic Places:

The 1929 Douglas Building:



The 1909 Henry Sensel Building:



The 1911 Frances Building



and the one-story 1929 Charles Piper Building.



Because they are all on the National Register (not just the City of Portland inventory), the downzoning will give less protection than these buildings already have with the national listing and associated federal law. But the downzoning will be detrimental to many other sites in this area.

3. The district is not continuous Streetcar Era Storefronts

This map shows the properties that were built after WW II, in **black**, and the properties that are not storefront buildings, in **blue**.



I realize that 3557 Hawthorne is listed as 1910, but having seen the last rebuild, the only intact wall from that date is the west side party wall. The rest is a remodel from about 1998. The adjoining parking lot is obviously not a storefront.

Of the three properties east of 36th, north side, they are: "too new, not a storefront, and too new".

The four properties west of 38th, north side, are all post-WW II storefronts.

The properties on Clay St are older houses, not storefronts.

So as far as intact 400' long sections, the south side from 35th Ave. to 37th and half a block east, qualifies, but no north side block face meets the conditions described.

Again, though, with the historic protections in place, and opportunities for more housing on several sites, this example shows that even well-known "vintage" districts are not necessarily appropriate for this Low-Rise Commercial Storefront downzoning scheme. There are opportunities to get needed density in this area without destroying any pre-war buildings, and which could actually enhance the district with needed residential vitality. The proposed downzoning is not needed and would be detrimental to many Comp Plan goals

Thank you.

Doug Klotz