

From: Doug K [mailto:dougurb@gmail.com]
Sent: Thursday, October 5, 2017 12:36 AM
To: Planning and Sustainability Commission <psc@portlandoregon.gov>
Subject: Thoughts on Code Reconciliation

Comments on Code Reconciliation Project 10-5-17

Chair Schultz and Commissioners:

While most of the proposed changes make sense, I have concerns about three items in the **Code Reconciliation Project** which you will learn about at a Briefing next week:

Self-Storage

The concern is the proposed new zones where Self-storage developments will be allowed. They will remain allowed in Industrial and Employment zones, but allowed Commercial zones will change from the current CG and CX (and EX), to CM-3, CE, and CX (in table 130-1 on page 77).

The CM-3 is not really equivalent to the EX that it will supplant in places. It is designed as a mixed-use zone, for commercial and residential projects, and can accommodate and is most likely to contain high-density residential along transit corridors. To allow self-storage in this zone would be to squander the prime locations the zone is, or is planned to be, mapped in. Self-storage should be prohibited in CM-3

The CE is admittedly similar to the CG zone. However, on places like SE Powell Blvd., the development on such a Major City Transit Street should take advantage of the transit opportunities, with neighborhood-serving as well as destination commercial uses, as well as the allowed residential.

Recent news coverage about a 62nd and SE Powell Blvd. self-storage proposal show the neighborhood opposition to this, based on lack of "eyes on the street", and other concerns about the large, mostly blank-walled, 3-story building proposed. Other neighborhoods are wary of similar developments within their boundaries.

In CE zones, especially on Transit Streets, self-storage should be prohibited, or at the least, much more stringent "active ground floor use" requirements should be added in this zone, with retail or office spaces at least 25' deep, with accompanying window requirements, and requirements for such uses to cover at least 50% of the ground floor area.

I note that in 33.284 (page 207), the Community Design Guidelines are proposed to replace the current Self-storage guidelines, which is a step in the right direction, but not enough, I think, for the CE zone.

Title 11 applications in Commercial/Mixed Use zones

The current Title 11 code exempts IH, IG1, EX, CX, CS, or CM zones from the requirements for Tree Preservation in 11.50.040 and the Tree Density requirements in 11.50.050. The CS and CM zone references will be removed (page 517). The staff proposal is to **not** insert the equivalent CM-1, CM-2 and CM-3 zones to **replace** them.

The practical effects of this are unclear, since where building coverage is 85% or greater, the requirements of those sections are apparently reduced or eliminated. It seems the changes would primarily affect less intense commercial developments with larger parking lots or landscaped areas, with tree requirements stricter than the Commercial zones landscaping requirements.

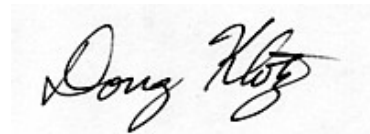
While I am a strong supporter of enhanced street tree requirements I am worried that on-site tree preservation and/or mitigation standards would adversely affect Commercial/Mixed Use development, and either raise costs or reduce housing development potential, especially in "high-opportunity" areas. Adding CM-1, CM-2 and CM-3 to the zones exempted in 11.50.040 and 11.50.050 would allay those concerns.

Map(s) 120-11

In addition, as I noted in the Map Refinement Project, certain RX zones along NE Halsey and on 45th Ave. in Hollywood are proposed to change to RH and to R-1, and an RH zone is proposed to change to R-1. These changes are proposed to be "reconciled" in this Reconciliation Project on old Map 120-11 and new Map 120-11. I oppose these changes, and believe the RX should be kept as RX or go to CM-3 (or a poor second choice is RH, which is slated to have new required setbacks, a less "urban" design than current), and the RH should remain RH.

The rest of the changes proposed seem reasonable.

Thank you.



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