



South Tabor Neighborhood Association

October 19, 2017

Portland Planning and Sustainability Commission
1900 SW Fourth Avenue, Suite 7100
Portland, OR 97201
psc@portlandoregon.gov

Re: Code Reconciliation Testimony, Comments on Proposed Draft

Dear Chair Schultz and Commissioners:

The South Tabor Neighborhood Association respectfully submits the following testimony regarding the Code Reconciliation Project proposed draft (9/25/17), Title 33.

SELF-SERVICE STORAGE

Our neighborhood association has been responding to a proposal to build a 143,000-square-foot, 900-unit self-service storage facility at SE 62nd Ave. and SE Powell Blvd. in a CG zone, and we have learned a lot about the conflicts this use presents with adjacent residential zones and the vision for future development along our transit streets and civic corridors.

Self-service storage is characterized by extremely low activity levels and employment compared to other uses. When sited on transit streets, the results are blank facades, low activity, and potential displacement and forestalling of residential development and the type of retail and commercial activity needed to bring services, employment, and vitality to our neighborhoods.

The proposed draft allows self-service storage in CM3, CE, and CX zones with additional limitations (33.284) and subject to design review. We request the following:

Option 1

- **Prohibit self-service storage in the commercial/mixed-use zone CM3.** We believe CM3 is more comparable to the commercial/mixed-use zone CM2 than it is to the current CG or EX zones. Differences between CM2 and CM3 should be about scale

— density of residential units, FAR, height, etc. — rather than about allowed uses. As a practical matter as well, it is likely that some CM2 will be rezoned to CM3 in the future as developers look to scale up projects. If CM3 were to allow self-service storage, we foresee those requests and community discussions becoming much more contentious.

- **Prohibit self-service storage in CE.** With five sites set to be zoned CE along SE Powell Blvd. in South Tabor — the largest of which is currently under review for self-service storage development — inviting more self-service storage would hamper retail, office, and residential development along this stretch of the street. SE Powell is being transformed from a highway flanked with auto-centric uses into a vibrant civic corridor with frequent service transit and higher density retail, commercial, and residential uses. We want to protect that transformation and allow it to happen. Since self-service storage is prohibited in other areas by design overlays, that makes our neighborhood and those adjacent to us targets for this type of development.

Option 2

While we believe there are good reasons to prohibit self-service storage outright in these zones, we want to propose some targeted changes as well that could address the issue differently. We have found that the current self-service storage guidelines are not strong enough to prevent the low activity use they were designed to redirect away from civic corridors and major transit streets.

While requiring that Type II Design Review use the more robust Community Design Guidelines is a step forward, we ask that you also add requirements for self-service storage in C zones:

- **Prohibit self-service storage in CM3 and CE on transit streets with frequent service lines.** Self-service storage is inappropriate for transit streets. Storage is primarily an auto-dependent use and a poor fit for a major transit street.

[Note: Should you decide against this option and still allow the use in C zones on transit streets, we ask that you not waive the parking requirements (Table 266-2). While this is not ideal from a planning standpoint, if there is going to be an auto-dependent use on a transit street, it should at least be served by parking.]

Option 3

Finally, we ask that you consider other adjustments to make the self-service storage use a better fit within the larger landscape. If you do decide to recommend allowing the use in either CM3 or CE, we would request limits on where self-service storage can be located within the site and how much of the site can be dedicated to that use.

- **Apply the standards of the Centers Main Street Overlay to self-service storage in C zones on transit streets with frequent service.** This would require additional ground floor uses to activate the street and make better use of the frontage and transit access. For CE zones, it would also respect that zone as place intended for employment. Typically with as few as one employee on site at any given time, self-service storage buildings do not generate much employment (or transit use).
- **Limit the size of sites where self-service storage can be located and/or limit how much of the site can be dedicated to that use and better define where the use can be located within a site.** This approach could be drafted similarly to the industrial size limitation for CM3 (33.130.100 B5: "*These types of uses are allowed but limited in size to assure that they will not dominate the commercial area and to limit their potential impacts on residential and commercial uses. . .*"). You could direct self-service storage off the ground floor, away from major street frontages, and require a mix of retail or office uses.

For example, self-service storage developments on lots 50' or wider could be required to meet the ground floor window requirements of the CM2 zone and have a minimum 25' depth of retail or office space on the ground floor for 50% of the length of the facade.

Or you could require that 50% of the ground floor area be dedicated to retail or office space and that, on lots larger than 9,999 square feet, no more than 50% of the entire building area be allowed for self-service storage. This would ensure that self-service storage in these zones would be part of more thoughtful mixed-use developments and would not dominate any one large site. This would also make it more likely that the entire building would be built to a quality that could be repurposed to office or residential should the market shift away from this use.

BUFFER ZONES

We request that you restore the prohibition on access through required setbacks (33.410.040 C.) that was included in the Buffer overlay zone chapter (33.410). This chapter has been deleted in the draft and the relevant setback and landscaping regulations moved to the Commercial/Mixed Use (33.130) and Employment and Industrial (33.140) base zones. But as far as we can tell the prohibition on access through required setbacks is no longer included.

This part of the existing code was an important tool for us to protect R-zones adjacent to and across from a CGb zone from the impacts of a driveway on a proposed commercial project (the aforementioned self-service storage proposal). Including this protection into the regulations of the base zone is of particular importance where commercial zones extend into or are surrounded by residential zones.

COMMERCIAL PARKING

We request that commercial parking in CE be either limited as in CM2 and CM3 or subject to conditional use review as in CX (and the current CG) and that CE be included in the list of zones specified in 33.130.100 B9 (Primary Uses > Limited Uses > Commercial Parking), 33.536.290 (Maximum Parking Allowed), and anywhere else needed to reconcile the code. We believe standards like 33.526.340 (Gateway Plan District) or 33.536.280 (Hollywood Plan District) should apply to structured parking in all C zones on major transit streets/civic corridors, requiring 50% of ground floor frontage to either have active uses or be built to accommodate active uses in the future.

Thank you for your work and consideration of our testimony. We hope you find it helpful as you continue this project. Please contact us with any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Duane Hanson". The signature is fluid and cursive, with a large initial "D" and "H".

Duane Hanson, President
South Tabor Neighborhood Association