

From: Emily Baratta [mailto:eabaratta@sbcglobal.net]

Sent: Friday, October 20, 2017 11:16 AM

To: Planning and Sustainability Commission <psc@portlandoregon.gov>

Subject: Fw: Request to submit Testimony regarding Code Reconciliation & Proposed Zone Change at 705 & 815 N. Fremont

Revised to include house number/mailing address:

Members of the Planning & Sustainability Commission,

I am writing to request reconsideration of the proposed zone change from CM2 to CM3 for the properties located at 705 & 815 N Fremont. I understand the challenge associated with a code reconciliation project and accurately applying new codes to existing zoning. However, when considering the statement made within the draft Code Reconciliation Project report, "...a new zone that was adopted as part of the Comprehensive Plan may be added, **if appropriate.**" I do not believe a CM3 zone to be appropriate in this instance.

As a resident of the neighborhood I do believe in efficient use of space and working to provide beneficial housing, transportation and commercial uses within our City. However, I also believe in transparency and prudent planning, taking into consideration neighborhood dynamics and long-term impacts of mixed-use. It is unclear to me how this section of the neighborhood on N. Fremont meets the requirements of a CM3 Zone. It is also unclear to me the status of applicable Environmental Impact Studies, Traffic Studies, the development analysis supporting this proposal and the City's due diligence process. I openly acknowledge I am not a planning expert nor fluent in City Codes and process. Yet, in reading about a CM3 zone, it appears the area does not meet the requirements, is not a true Civic Corridor and is clearly dissimilar to referenced streets such as N Interstate, NE MLK Jr., and N. Williams.

Specifically addressing the Zone requirements listed in this map as follows:

1. "This large-scale commercial mixed use zone is intended for sites close to the Central City, in high-capacity transit station areas, town centers and on civic corridors. Buildings in this zone are generally expected to be up to six stories."

Response: The proposed area is neither in a high-capacity transit station area, nor a true civic corridor. It is, in fact, a very narrow, two-way street with limited visibility due to curves. There are no other 6 story buildings on the block and is a transition point from minimal commercial use to residential neighborhoods.

2. "This zone is generally applied on streets such as N Interstate, NE MLK Jr., N Williams and in town centers and districts transitioning from employment to mixed use."

Response: This section of N. Fremont is a narrow two-way street already approved for base zone CM2. I would request to see the study completed that supports a conclusion of similarity to N Interstate, NE MLK Jr., and N. Williams, streets significantly wider and able to support traffic as a major thoroughfare.

3. "Civic Corridors - Civic corridors are some of Portland's widest streets and major transit corridors (such as Sandy, Barbur, and Foster) that connect centers to each other and to the Central City. Besides their key transportation functions, which typically include major traffic and freight roles as well as transit, civic corridors are intended to include places with transit-supportive densities of housing, commercial, or employment uses. Civic corridors policies are intended to support transformation of Portland's most important streets into premier streets that are enjoyable places to live, work and gather; serve as safe mobility corridors for all types of transportation and pedestrians; and that incorporate ecological function into their design."

Response: When comparing Civic Corridors such as Sandy, Barbur and Foster, it is unclear to me how this section of N. Fremont (between N. Vancouver and N. Mississippi) meets the definition of a Civic Corridor. Although transformation of the area is in process including mixed-use and (limited) multi-story construction, approving a zone above CM2 does not seem justified given the above definition. As a resident I would be concerned with transportation issues and pedestrian safety (focused on our Boise-Eliot Elementary School attendees) with already impacted space limitations.

In summary, if not already done so, I request that the studies supporting to the proposed change from CM2 to CM3 be provided to the Boise Neighborhood Association for public view, along with a summary justification so neighborhood residents can clearly understand the requirements for a CM3 approval and how the Planning and Sustainability Committee and City of Portland believe those requirements have been met.

Thank you for your consideration.

Sincerely,
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