

October 31, 2014

Portland Planning and Sustainability Commission  
Comprehensive Update  
1900 SW 4<sup>th</sup> Avenue, Suite 7100  
Portland, OR 97201

Attn.: Marty Stockton

As Trustee of the Bastasch Family Trust, I am writing in regard to the changes of the Comprehensive Plan changes proposed for the Trust's property located at 1401-1421 SE Stark and 423 SE 15<sup>th</sup> Avenue.

Please review the following regarding our properties at those addresses:

<b>Parcel #</b>	<b>R Number</b>	<b>Address</b>	<b>Current Use</b>	<b>Current Comp. Designation/ Zoning</b>	<b>Proposed Comp. Designation/ Proposed Zoning</b>
1	R124417	1403 SE Stark	Mixed Commercial, 10,000 sf retail, commercial, office.	Medium Density Residential/ R-1	Mixed Use/CS
2	R124418	1421 SE Stark	Mixed Commercial, 5,000 sf retail, commercial, office	Medium Density Residential/ R-1	No change
3	R124419	423 SE 15 <sup>th</sup>	House, vacant lot fronting on corner of 15 <sup>th</sup> and Stark	Medium Density Residential/ R-1	No change

Please review the attached photograph. You will notice that although Parcel 1 and Parcel 2 are separate tax lots, the lot line that separates the tax lots bisects an existing building that was built in two stages. The buildings share a common wall, a basement, access to one elevator and one heating plant. In historical fact, the westerly portion of the building was built in 1929 as the Deluxe Bakery and the easterly portion was built in 1945 as the bakery's warehouse and delivery center. These properties have been in common ownership and control for 85 years.

On the Proposed Draft Map of the 2036 Comprehensive Plan Update, staff has suggested that Parcel 1, and only Parcel 1, be changed from R-1 to CS. I am writing to request that this be reconsidered and that the change in Comp Plan Designation/Proposed Zoning be extended to include Parcel 2 and Parcel 3.

My reasoning is as follows:

I understand that one of the underlying problems reasons for this Comp Plan update is to have zoning reflect the current land uses. On both Parcel 1 and Parcel 2, the current uses are non-conforming. If the map is left as drawn on the Draft, this non-conformance would continue for one-third of the building. This seems like it might have been an oversight and could be corrected by extending the change to the east through Parcel 2.

As relates to Parcel 3, I understand further that one of the things that the neighborhood would like to facilitate is the creation of a lively commercial presence on the ground level for commercial corridors like SE Stark. Leaving Parcel 3 designated and zoned as it is currently, will promote, at best, the development of three or four additional residential units on the ground floor with no active street presence. It seems that designation/zoning that allows for pedestrian-oriented development with ground floor commercial and residential above would be very much in keeping with the goals of this endeavor.

For these reasons, I request that you consider changing the 2035 Comprehensive Plan to include Mixed Use – Urban Center designation for all three parcels.

Please feel free to contact me if you have any questions.

Very truly yours,

Frank Bastasch  
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