



**Bureau of Planning and Sustainability**  
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## Portland Planning and Sustainability Commission

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February 8, 2018

Mayor Ted Wheeler and Members of Portland City Council  
Portland City Hall  
1221 SW Fourth Ave  
Portland, OR 97204

Dear Mayor and Commissioners:

The Portland Planning and Sustainability Commission (PSC) is pleased to forward our recommendations on the 2035 Comprehensive Plan Code Reconciliation Project (CRP) for your consideration. The purpose of this project is to reconcile existing code with the new zoning designations adopted with the 2035 Comprehensive Plan. These include:

1. Amendments to Title 33, Zoning, to:
  - a. Reconcile technical changes and some development allowances.
  - b. Reconcile Inclusionary Housing provisions adopted by Council in December 2016.
  - c. Respond to testimony brought to the PSC including changes to use allowances for Self-Service Storage buildings in areas with a pedestrian emphases or higher level of transit service or investment.
2. Amendments to Title 32, Signs, to reconcile technical changes and certain allowances because the recently adopted zones are not direct replacements for existing zones.
3. Amendments to Title 11, Trees, to remove references to the CS and CM zones since they were among a list of zones listed in Title 11 that were exempt from Tree Preservation & Density Standards and Tree Density Standards.

On October 24, 2017, the PSC held a public hearing on the Code Reconciliation Project. On November 14, 2017, December 12, 2017 and January 9, 2018 the PSC held work sessions to discuss amendments to the staff proposal and vote on recommendations.

On January 9, 2018, the PSC voted unanimously (9-0) to recommend approval of the revised package of code amendments and forward them, with the following noted caveats:

### *Affordable Commercial Space Bonus*

Prosper Portland is identified to administer the adopted Affordable Commercial bonus provisions in the new Commercial/Mixed Use Zones which offers additional floor area and height for projects that provide a portion of their commercial space with enhanced affordability. We applaud this innovative concept, however, there remains a lack of clarity about these provisions/rules, program goals and specifics. The PSC agreed to recommend the zoning code changes, provided that Prosper return to PSC in March 2018 with a complete package of program rules. After that meeting, the PSC will send a follow-up recommendation to Council on this specific topic.



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### *Small-Scale Neighborhood Businesses*

The new Commercial Residential (CR) zone presents an opportunity to fill gaps in access to goods and services throughout the city. The PSC recommends that Council direct staff to explore the need and opportunities for better, more walkable neighborhood services. The exploration could include:

1. Identifying areas within the city where neighborhood commercial opportunity is lacking as possible areas for future limited CR Comprehensive Plan and zoning map changes.
2. Considering a reduced fee, or other streamlining mechanism, to allow for Comprehensive Plan and Zoning Map changes from residential to CR, where there is a demonstrated need and strong support for change.
3. Exploring changes to the city's Home Occupation codes to allow more flexibility to accommodate home-based businesses and meet neighborhood needs.

### *Self-Service Storage*

The PSC received a significant amount of testimony about the streetscape and development impacts of low-activity Self-Service Storage uses in both the Code Reconciliation and Map Refinement projects. Compelled by testimony, the PSC recommended changes to staff's initial proposal to foster greater levels of activity in specific areas of the city. We expect the Council will hear additional testimony on this topic.

### *Title 11, Tree Code*

The PSC supports staff's proposal and the Urban Forestry Commission recommendations to remove and not replace the CS and CM zone exemptions in support of 2035 Comprehensive Plan and Climate Action goals and policies. However, we recommend that the tree preservation and density requirements of Title 11 and landscaping requirements of Title 33 be reviewed and aligned to reduce conflicts.

### *Safety and Level of Service as Evaluation Factors and Approval Criteria*

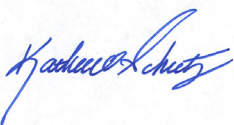
The 2035 Comprehensive Plan envisions a multi-modal transportation system that decreasingly relies on single-occupant vehicle trips and prioritizes other travel modes. As part of the CRP, chapters citing transportation evaluation and approval criteria were amended which prompted discussion about the terms "safety" and "level of service." The PSC recommends that Council direct the Portland Bureau of Transportation to expedite work that better defines "safety" as a transportation evaluation criterion and to explore alternatives to the vehicle capacity-oriented "level of service" measurement for evaluation of transportation issues in land use reviews.

### **Recommendations**

The Portland Planning and Sustainability Commission recommends that City Council adopt the amendments to Title 33, Title 32 and Title 11 in the *Code Reconciliation Project — Recommended Draft*, dated February 2018.

Thank you for the opportunity to participate in the review of this project and for considering our recommendations.

Sincerely,



Katherine Schultz  
Chair

