

May 22, 2016

Portland Planning and Sustainability Commission  
1600 SW Fourth Avenue  
Portland Oregon

Dear Commission Members:

I was quite disturbed by Planning staff's response to my question about the wholesale EX to CM3 translation – that since housing is becoming a predominant use in the EX zone we should change the policy to match what the market is producing. I do not think that is appropriate planning – If our zoning is not successfully carrying out our policies, it is the zoning mechanisms that should be changed to support the policies, not the other way around. The CM3 zone will be quite successful in support of the policies in some EX zoned areas, but not in all of them.

The EX zone has become a catch all zone, covering a wide variety of areas with differing characteristics. It grew out of the M3 zone, which before 1980 was typically placed in areas that were transitioning from housing to small scale industrial uses like the eastern edge of NW, the western portion of Elliot, and other similar areas around the City. Through many years of efforts, the housing in these areas was stabilized and balance reached. The rezoning to CM3 will change that balance

The example I chose of St Johns was and is an appropriate example of the CM3 zone not being an appropriate fit. The St Johns Plan limits the proposed rezone area to 45' in height (55' with design review). By changing the zoning to CM3, the base height limit will be increased 10', with the possibility of 75' tall buildings when bonuses are used. Does this fit the neighborhood plan? What views will be blocked by 75' buildings? Would CM2 be a better match? I don't know, but it should be looked at.

Another area to look at is the Vancouver-Williams corridor which continues to have a successful mix of housing and small scale employment opportunities. Are we sure that we want this area to be converted to a multi-story housing district and lose the businesses which support the Central City?

Staff heard early from NWDA about the misfit between the NW Policy Plan's goals of job preservation and the CM3's emphasis on housing, and they have responded by proposing EG1 zoning for part of the EX zoned area. While not a perfect fit, it will meet the plans job preservation goals and should be accepted.

I worry, however, whether other similar areas have similar conflicts, but have not spoken up in the same effective manner as NWDA. I hope you will look more closely of at the differing characteristics of our present EX districts and not simply use CM3 as the default answer for all of them.

Rick Michaelson