

## Portland Planning Commission

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June 24, 2025

Council President Elana Pirtle-Guiney and City Councilors  
1221 SW 4<sup>th</sup> Avenue  
Portland, OR 97204

Dear Council President Pirtle-Guiney and City Councilors,

The Portland Planning Commission is pleased to forward our recommendation on the Code Alignment Project for your review and consideration for adoption. At our June 10, 2025, meeting, the Planning Commission voted unanimously to forward the following Zoning Code amendment and recommends that the Council take the following actions:

- Adopt the Code Alignment Project Recommended Draft; and
- Amend the Zoning Code section 33.258.070 to suspend all nonconforming upgrade requirements until January 1, 2029.

The Code Alignment Project includes regulatory relief from four different City Codes during a time of low economic activity in Portland. The Planning Commission is charged with making recommendations to City Council on amendments to Title 33, the Zoning Code. Pausing nonconforming upgrade requirements is the component of the Code Alignment Project's larger proposal that is within the Planning Commission's purview.

Nonconforming upgrade requirements help bring commercial properties that were developed under a previous code closer to compliance with current Zoning Code standards. They apply to sites that may be nonconforming with respect to one or more aspects of site landscaping, screening, pedestrian circulation systems, short- and long-term bicycle parking, and paving of parking or exterior storage areas. The upgrades are triggered when alterations occur to a site (interior, facade or exterior) and the value of the project exceeds \$356,300.



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Sites with residential uses were already exempt from these upgrade requirements until January 1, 2029, as part of the Housing Regulatory Relief Project (Ord No. 191609, effective March 1, 2024).

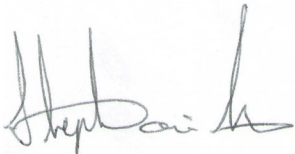
### **Key Planning Commission Considerations**

The Planning Commission acknowledges the importance of regulatory alignment work across City titles. We also recognize the value of pausing upgrade requirements to support small businesses and small projects in the short term. While the proposed changes are narrow in scope, they are emblematic of the City's openness to support Portland's economy.

While we support the proposal, the Commission discussed that incremental efforts to relieve projects from regulations may have an overall negative impact on reaching the City's other goals and suggest that the cumulative impacts on pedestrian improvements, bike parking, and tree canopy be systematically and holistically evaluated. In addition, the Commission supports ongoing funding to address larger code alignment efforts that reduce regulatory complexity, thus reducing permitting and code challenges.

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

Sincerely,



Steph Routh  
Chair

