November 12, 2015

City of Portland Bureau of Planning and Sustainability Attn: Barry Manning Mixed Use Zones Project 1900 SW 4th, Suite 7100 Portland, Oregon 97201

RE: Mixed Use Zones Project; Discussion Draft – September 2015

The draft is a strong improvement over the existing commercial zoning code.

The term "Commercial Storefront" shall be missed; however the approach to the new zones maintains the important qualities of the Commercial Storefront zone and adds flexibility and incentives.

Two comments:

1) "Special Area Plan District"

Large properties (four acres or more) exist throughout Portland and are located in industrial or residential areas. These properties are occupied by important low intensity commercial uses on large site with significant amounts of cultivated natural areas and/or plants and trees. These include golf courses; farms; nurseries; and sanctuaries. These commercial uses need to thrive as commercial uses due to their special and historic purpose.

Over time, a large low intensity (and often very green use) may no longer be viable and the property would require conversion to another use.

A "Special Area Plan District could provide that mechanism. As all plan districts, the districts would allow the operation, improvement, and expansion within limits of intensity regardless of the underlying zone. If and when the property is redeveloped, then the special area plan district would require a land use process such as subdivision and/or master plan.

2) Clear standards

The draft proposes standards that can be adjusted such as exterior display, drivethrough, and storage. The code zoning could be designed to identify standards to permit exterior display such as a ten foot lawn setback, ornamental fencing, and flower beds (this has been on several projects through the adjustment process). Clear standards are consistent with the City's Compatibility Guidelines and current policy.

Sincerely: Peter Finley Fry

2153 SW Main Street, #105, Portland, Oregon USA 97205 Office (503) 274-2744 • Fax (503) 274-1415 • peter@finleyfry.com