



133 SW 2nd Ave, Suite 201 • Portland, OR 97204 • (503) 497-1000 • fax (503) 223-0073 • www.friends.org

Southern Oregon Office • PO Box 2442 • Grants Pass, OR 97528 • (541) 474-1155 • fax (541) 474-9389

Willamette Valley Office • PO Box 51252 • Eugene, OR 97405 • (541) 520-3763 • fax (503) 223-0073

To: Portland Planning & Sustainability Commission

From: Mary Kyle McCurdy

Deputy Director, 1000 Friends of Oregon

Date: July 8, 2016

Re: Composite Zoning Proposal

Commercial / Mixed Use Zones

1000 Friends of Oregon works with Oregonians to enhance our quality of life by building livable urban and rural communities, protecting family farms and forests, and conserving natural areas. Since our inception over 40 years ago, this has included insuring affordable housing and walkable neighborhoods in every community.

As part of this work, 1000 Friends has served on several recent Portland advisory committees, including the Mixed Use Zones Advisory Committee, the Centers & Corridors Parking Advisory Committee, and the Residential Infill Project Stakeholder Advisory Committee. Therefore, we are concerned to see that the city is considering downzoning in some Neighborhood Centers – changing existing zoning from CS to CM1 to reduce the allowed height of buildings - which will result in the loss of housing and employment capacity in the mixed-use walkable core of many neighborhoods. These are places where other Portland polices seek to encourage just such density and mix of uses.

We understand this is being considered for up to 13 Neighborhood Centers because they have concentrations of 1-2 story buildings from the “Street Car Era,” and their current zoning of CS would allow building heights up to 45 feet – in other words, 3-4 story buildings. Therefore, the city is considering *downzoning* these areas to CM1, a designation that would allow buildings up to only 2 stories.

We oppose the blanket use of this downzoning, for several reasons:

- It will effectively remove tens of thousands of square feet of potential residential and/or small business space from core, walkable areas. These are the very areas that the city has, correctly, otherwise said should hold more housing and local employment.
- While the lost potential might seem small relative to the overall capacity of the city for these uses, it is the *locations* that are valuable. These Neighborhood Centers are served by transit and offer other opportunities and amenities within walking distance for the largest and fastest growing part of the population – those in 1-2 person households, and in particular older persons.
- The analysis used by the city to pick these 13 Neighborhood Centers focused only on the height and age of the buildings. It lacks an analysis of transit and other amenity

accessibility. For example, the Moreland Neighborhood Center is within walking distance of a MAX Orange Line station (0.4 mile); three neighborhood schools; several neighborhood parks (Westmoreland Park, Sellwood Park); and has two bus lines that intersect in it. Other Neighborhood Centers to which this downzoning is being considered might have similar amenities and services, but these factors do not seem to be included in the city's analysis.

- Locating housing and local employment near to transit is a particularly effective tool in reducing transportation-related greenhouse gas emissions.

We recommend that instead of downzoning these areas based on one criterion (street car era building heights), that the city retain the current height capacity (which would mean a rezoning to CM2, not CM 1), and instead use a tool more focused on the particular historical features of each Center, such as a Design Overlay with design guidelines appropriate to the particular Center.