

To: Portland Commercial Developers Inc.

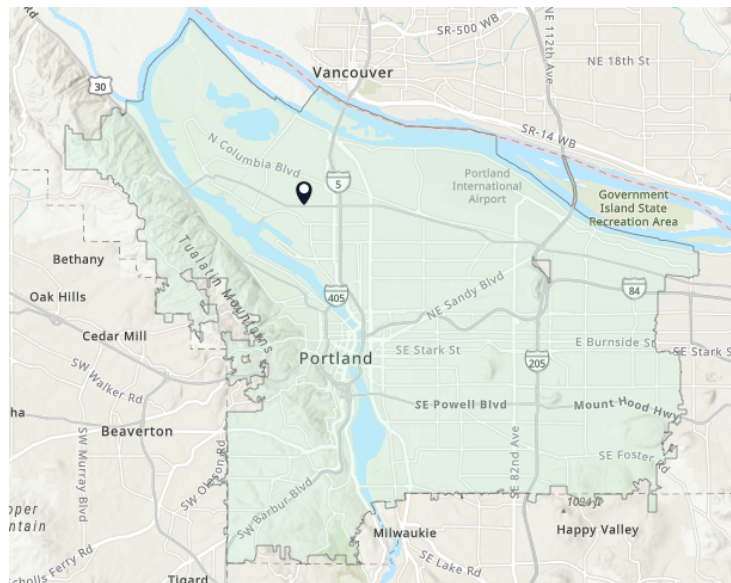
From: Dylan Giliberto

Date: October 22, 2025

Subject: 3171 N Lombard St Zoning and Land Use Analysis

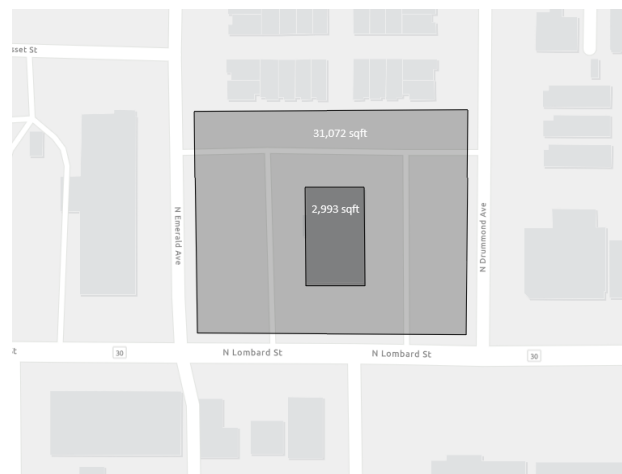
Regional Context

The property (3171 N Lombard St. Portland, Oregon 97217) is located in the Kenton neighborhood of Portland. Directly across N Lombard St is the Arbor Lodge neighborhood, and St. Johns is located 1.9 miles west.



Above - The location of 3171 N Lombard St relative to the City of Portland boundaries. Boundary data from [Oregon Metro](#) Below - Diagram of the property and existing structure

The site currently hosts an Arby's drive-thru restaurant, as well as adjacent parking for restaurant customers. The parcel is 31,072 sqft, with 2,993 sqft of that dedicated to the restaurant building. The remainder of the parcel is used for landscaping or parking. This works out to 9.6% of the parcel being used for the structure.



TriMet bus routes 72 and 35 serve both an eastbound and westbound stop located 520 feet to the east. A TriMet MAX Yellow line stop is just under a mile to the east, providing direct service to Downtown Portland and Milwaukie.

Zoning and Permitted Uses

Legend

- 3171 N Lombard St
- Zoning
 - CM1
 - CM2
 - CR
 - R2.5
 - R5
 - RM1
 - RM2

Sources: Esri; TomTom, Garmin, FAO, NOAA, USGS, (c) OpenStreetMap contributors, and the GIS User Community.

Scale: 0 145 290 580 Feet

Zoning context for 3171 N Lombard St. Zoning data from Portland BPS

Chapter 33.130, Table 130-1 “Commercial/Mixed Use Zone Primary Uses” outlines what uses are permitted for this base zone. Household and group living are both permitted in the base zone, as are most commercial categories. Self-service storage is explicitly prohibited, while commercial parking and quick vehicle servicing have limitations (33.130.100.B.8 and 33.130.100.B.1.c). Finally, “Major Event Entertainment” uses (like concert or sports venues) are considered a conditional use and are subject to approval.

Most industrial uses are prohibited, however, manufacturing and production, wholesale sales, and industrial service uses are all limited or conditionally permitted. Approval of an industrial use does not seem likely given the moderate-intensity zone and the city’s desire for dense, pedestrian oriented properties along this corridor. Most institutional uses are permitted, including schools, open space, and medical centers.

While no parking is required, accessory parking lots to another primary use are permitted (33.130.100.B.8.c.1). New commercial surface lots as a primary use are prohibited, while commercial parking structures are permitted (33.130.100.B.8.a/b).

Other Development Standards

Given that the property abuts a residential zone in the back, a 10 foot setback from the back property line is required. N Lombard St is not a designated civic corridor with a required setback (33.130 Map 130-1), therefore the 10 foot minimum, 20 foot maximum setback from the N Lombard St does not apply (33.130 Table 130-2).

The base zone for the site allows a 100% lot coverage (33.130.220.B) (aside from applicable setbacks). Additionally, the lot is subject to Portland’s Ground Floor Window Standards, meaning that at least 40% of the front facade facing N Lombard St must be windows (33.130.230.B.2.a.1). If any residential units are constructed, then at least 48 square feet per unit of outdoor common area is required (33.130.228.B.1.b).

The base zone specifies a maximum floor to area ratio (FAR) of 2.5 (33.130 Table 130-2), with possible bonuses for inclusionary housing, affordable commercial space, or planned development. As the site is less than two acres in size, it is not eligible for the third option (33.130.212.E). The maximum FAR with bonuses is 4. While in some cases these same bonus options can permit an additional ten feet in height limit for CM2 zoned properties, this is not applicable to the site as it is not in a historic district, conservation district, or design overlay zone (33.120 Table 130-3 [1]).

The development standards require that buildings greater than 200 feet in length be broken up into sections (33.130.222.B). As the property is less than 200 feet in length in all directions, this standard is not applicable. A facade articulation standard takes effect in the CM2 zone for buildings over 35 feet high and with a facade of over 3,500 square feet (33.130.222.C.1.a). This standard will not apply before January 1st, 2029 if any residential use is included in the development (33.130.222.C.1).

The site is subject to [parking maximums](#) which vary by use (33.266.115 Table 266-2). For the site's current use, the maximum parking allowed is 1 space per 75 sqft, or 39.9 spaces. The lot currently has 48 spaces, so redeveloping the property would require a reduction in parking. Nearly all uses permitted for this property have bicycle parking minimums in place, with the number of long and short term spaces required depending on factors such as net building area, bedrooms, or rentable rooms (33.266 Table 266-6 Minimum Required Bicycle Parking Spaces).

If the proposed development includes more than 20,000 square feet of non-household living uses, then one loading spot of standard A (33.266.310.D.1) is required. If that value exceeds 50,000 square feet, then a second space will be required (33.266.310.C.2). If the only use is household living, then the standards specified in 33.266.310.C.1 apply.

Finally, a 10 foot landscape buffer is required between the property and the adjacent residential zone. This can be combined with the 10 foot setback, and can contribute to the minimum 15% lot landscaping coverage minimum. This landscaping coverage minimum can also be met using ecoroofs, large trees, or pervious paved surfaces (33.130 Table 130-2).

Land Use Reviews

Though the property lies in a comprehensive plan designated civic corridor, there is no design overlay. Additionally, most commercial and residential uses are allowed by right, meaning that a land use review should not be necessary. The only exception would be if one of the aforementioned conditionally approved uses was selected, in which case the city would need to review the case and make a decision to approve or deny the use.

Analysis

The site's current use and condition is much less intense than is permitted, or than what the city is aiming to achieve along N Lombard St. The neighborhood has many multi-family dwellings, including some newer developments. Notably, the property

behind the site is a 33 unit development built in 2023. Existing commercial properties along the corridor tend to have more pedestrian friendly frontages, often having storefronts along the sidewalk.



Example of pedestrian-oriented commercial development on N Lombard St, from Google Maps.

Currently, the use of the site is not the best fit for the area. The property is located within walking distance of multiple neighborhoods, each of which has moderate housing densities along the Lombard corridor. The site has direct, frequent transit access, and is located on a key civic corridor. The current structure and accompanying parking lot do not suit the site or adequately serve the neighborhood. Additionally, the current use is not making the most out of the valuable land from an economic perspective. The city has made it clear in the zoning designations, the specific codes, and in the comprehensive plan designation that this site should be home to a more intense use.

There are a number of more intense uses that could be construed at this site. One example would be a denser commercial development. The property could easily host four, or potentially even more, commercial tenants on just one level. Above that, the zoning allows for further commercial tenants, or more likely, office or residential uses. With 45 feet of vertical space to work with, the site could easily host commercial on the first floor and three floors of apartments above. If any residential units were to be constructed, then a minimum density requirement would kick in. This rule requires one unit per 1,450 square feet of site area, or 21.4 units (33.130 Table 130-2).

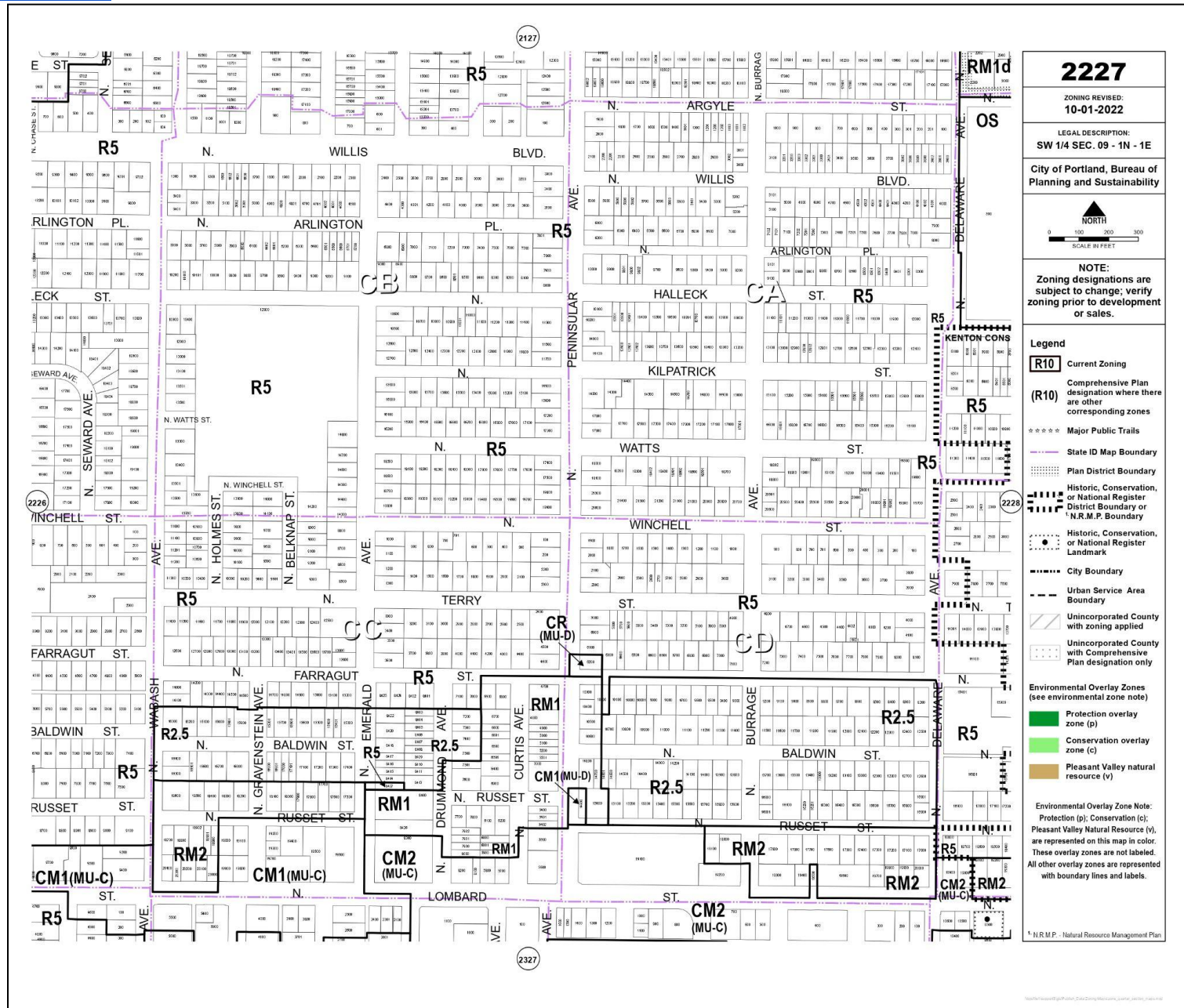
The proximity to numerous frequent transit services means that parking is likely not necessary on the site. Any parking needs for future tenants could be met with the ample street parking nearby, and the transit connections would likely attract car-free

households (in the case that residential is decided upon). If parking was still desired as a feature, this could still be easily accomplished given the size of the lot. 'D' Street Village, located at 3126 SE Division St, built four ground-level commercial units and over 50 residential units above in a four story structure while maintaining room for a small parking lot below. This was accomplished in the same base zone (CM2) and with a smaller lot (20,000 sqft).

If a less intense development is desired, then even a single floor, pedestrian-oriented commercial building would much better serve the neighborhood. The current parking lot and drive thru do not create a welcoming environment for pedestrians, so any replacement of the structure should directly face and interact with the sidewalk.

Appendix A - Zoning Quarter Map

[Link to download](#)



Appendix B - Title 33 Table

Basic Information	Description
Property Address	3171 N Lombard St. Portland, OR 97217
Property ID	R242434
Lot Size	31,072 square feet
Owner	3171 N Lombard St LLC
Year Constructed	1974
Building Size	2,993 square feet
Base Zoning Designation	CM2 (Commercial Mixed Use 2)
Overlays	None
Plan Area Designation	Civic Corridor
Neighboring Land Uses	Commercial, Multi-Family Residential, Single-Family Residential
Adjacent Zoning	CM1, CM2, RM1, RM2, R2.5, R5
Uses	Description
Current Use	Low density commercial, drive thru, parking lot
Allowed Uses	Commercial, Mixed Use, Residential, Institutional, Open Space, Office, Group Living, Vehicle Repair
Conditional Uses	Major Event Entertainment, Manufacturing/Production, Industrial Service, Basic Utilities, Community Service
Prohibited uses	Self-Service Storage, Warehouse/Freight Movement, Fossil Fuel Uses, Railroad Yards, Waste-Related
Development Standards	Title 33 Standard
Density	Minimum, 1 unit / 1,450 square feet site area
Building Height	Max 45 feet, bonuses not applicable due to lack of design overlay district
Floor Area Ratio	Max 2.5 (Max with possible bonuses is 4, see 33.130.212.C/D/E)
Setbacks	From adjacent residential zone: 10ft
Building Coverage	100%
Building Length and Facade	200 feet

Landscaping	15% lot coverage, 10' buffer to residential zones
Outdoor Areas	Yes, 48 square feet / unit residential
Ground Floor Requirements	40% facade coverage facing N Lombard St
Other Requirements, (as applicable)	Minimum density, 21.4 units (33.130 Table 130-2)
Auto Parking	No minimums, maximums apply (33.266.115 Table 266-2)
Loading	Yes, size and quantity varies (33.266.310.C)
Bicycle Parking	Minimums apply (33.266 Table 266-6)