

# Urban Design Panel

Portland and Oregon Members of the American Institute of Architects, American Planning Association and American Society of Landscape Architects

April 22, 2021

Mayor Ted Wheeler and Commissioners Rubio, Ryan, Hardesty and Mapps  
Portland City Hall  
1221 SW 4<sup>th</sup> Ave.  
Portland, Oregon 97204

## **RE: COMMENTS ON RECOMMENDED DRAFTS OF DOZA CODE AND MAP AMENDMENTS AND PORTLAND CITYWIDE DESIGN GUIDELINES**

Mayor Wheeler and Commissioners:

We are writing today to recognize the outstanding work of the Planning and Sustainability Commission, the Design Commission, staff from the Bureaus of Planning & Sustainability and Development Service and consultants for the objective Code and Map Amendments and the discretionary Citywide Design Guidelines that we believe will significantly improve the quality of development in the City of Portland, and the design review process in general.

The Urban Design Panel (UDP) is sponsored jointly by the Oregon and Portland chapters of the American Institute of Architects, the American Planning Association and the American Society of Landscape Architects and is composed of urban design professionals from those three organizations.

The Panel's members first identified almost eight years ago issues with the design review process, particularly the time and cost of navigating the process, the lack of focus on adopted design guidelines, the expanding interest from neighborhoods in design review and new design districts, the inadequacy of the old Community Design Guidelines and the city's capacity to effectively administer development approvals. We have worked collaboratively with the city bureaus and consultants since that time and are pleased to report that these issues have been embraced and addressed in the recommended drafts before you.

### **The Urban Design Panel supports the Portland Citywide Design Guidelines as presented in the DOZA Recommended Draft Vol. 3 and recommends adoption.**

The UDP has studied the Code and Map Amendments, DOZA Recommended Draft Vol. 2 and supports the Amendments as presented with the inclusion of the recommendations for the following sections:

1. **Design Standards Threshold.** The proposal allows buildings up to 75' located outside of the Central City to use prescriptive standards as an alternative to design review. The current threshold is 55'. Section 33.420.050.B.3. Page 33.

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Standards do not allow a public process and cannot adequately address social, physical and natural context in a public forum, particularly in districts where the tallest existing buildings are typically two to three stories high.

**Recommendation: Retain the current threshold of 55’.**

2. **Procedure for Design Review of Affordable Housing Projects.** The proposal is to eliminate the required DAR when qualifying affordable housing projects choose a Type 2 instead of the required Type 3 review process. The current requirement requires a DAR when a Type 2 is picked. Footnote to table 825-1. Page 153.

Residents living in affordable housing projects should not be subject to lower design standards, opportunities for community engagement or input from design professionals serving on the Design Commission compared to all other buildings located in the same "d" overlay zone.

**Recommendation: Restore the Type III review for affordable housing in the "d" overlay and consider procedural practices such as expedited review for all affordable housing projects.**

3. **Factors Reviewed during Design Review.** The proposal does not include zoning entitlements (maximum height and maximum FAR) as features that can be reduced during the design review process. Section 33.825.035. Page 159.

It is desirable and sensible to guarantee allowed FAR/height for a project because that is a basic entitlement defined in the Comprehensive Plan.

**Recommendation: Support the current proposal to not include maximum height and FAR as factors that can be reduced through the design review process.**

4. **Design Commission Membership.** Two members are proposed to be dedicated positions for "Sustainable Building Practices" and "Natural Resource Management".

Proposal includes current requirement of a RACC liaison. Proposal limits Public-at-Large: "cannot be employed in a development related field". The above totals 4 members of a 7-member Commission. Section 33.710.050.B. Page 133.

**Recommendation: Refine language to emphasize that the Design Commission be comprised of a diverse set of perspectives, including sustainability and resource management, but that the emphasis on membership should be experience and expertise in urban design. Ensure Design Commissioner recruitment efforts are**

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**equitable including additional and targeted outreach to historically under-represented individuals including women and people of color.**

5. ***Urban Design Diagrams and District Character Statements.*** Currently, the proposal does not specifically reference urban design diagrams developed for the Central City Plan Update as important context documents for design review. District character statements are mentioned but their development are a deferred action subject to funding.

**Recommendation: Develop and adopt as a high priority urban design diagrams and character statements for all districts subject to design review.**

**The Urban Design Panel recommends adopting all other Code and Map Amendments presented in Vol. 2. We concur with the emphasis placed on a number of specific amendments noted in the Design Commission’s testimony to Council, April 19, 2021, pg. 5.**

Thank you for this opportunity to provide testimony on this important set of amendments and proposals. The Urban Design Panel looks forward to helping implement each of these efforts for the betterment of our city.

Sincerely,

**Urban Design Panel Executive Committee**

David McIlnay, AIA

Brian Campbell, FAICP

Sean Batty, ASLA

Bob Boileau, AIA, AICP

John Spencer, AICP

Brian Stuhr, ASLA

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