



August 1, 2016

Planning and Sustainability Commission  
1900 SW Fourth Ave., Suite 7100, Portland OR, 97201  
**Attn: CC2035 testimony – Proposed Building Height modifications**

**Attention Commission:**

Great job on the update process for the Central City section of the City's Zoning Code. As architects working in the Portland for the past six years, we applaud the city's effort to take on the gigantic challenge of finding the right balance that leads to the most public benefit while ironing out several items that are either in conflict with other building codes, or are cost prohibitive for property owners.

One unresolved item that we still regularly run into is in regard to measuring building height for occupied roofs, a building element that didn't exist when the method for measuring a building's zoning height was first established. While the Base Height exceptions in **33.510.210.C** were updated to resolve some issues we constantly face, we didn't see any proposed revisions to **33.930.050 Measuring Height** to resolve the bigger picture.

On one hand, projects are often against the zoning code height limit for financial reasons. On the other hand, all of our projects provide occupied roof decks, green roofs, and solar panels in addition to all the typical mechanical equipment. As you can imagine, when you're squeezing in all these elements, these roofs have to utilize every inch of space as our buildings try to do their part to reduce our environmental impact and create a livable place to call home.

As part of the American Institute of Architect's 2030 Challenge, the building industry is working toward net zero energy buildings by 2030, increasing the need for solar panels on roofs. The city already realizes the importance of greenroofs for stormwater management. There are also many documented psychological benefits telling us we should be providing roofscapes for building occupant use in a city with a limited amount of park space and a fast-growing population craving more opportunities for outdoor reprieve from the densifying daily environment we're building. Given all the benefits to the world, the city, and the local community, we strongly urge you to consider two Zoning Code revisions to eliminate the last remaining roadblocks to achieving consistent zoning code interpretations making these public benefits possible.

**Within section 33.930.050 Measuring Height, it's time to amend the building height measurement for occupied roofs to be measured to the top of occupied roof walking surface.** In addition to eliminating any differences in interpretation among city staff and design professionals, this would provide the needed flexibility for various roof considerations noted below.

Also, **regarding building height exceptions / allowable projections within the 33.510.210.C Central City zoning section and all other base codes and community design review standards, expand the list of exceptions / allowable projections of any length to include parapets, furniture and permanent fixtures, planters, and railings.**

# SOLTERRA

- This would align Zoning Code and Fire Code roof measurement locations, simplifying documentation and reducing staff review confusion.
- This would allow parapets next to rooftop benches to be taller than 42" above the roof to provide the required level of safety when children inevitably stand on the bench.
- This would allow roof maintenance workers to safely do their jobs without having to install safety railings after issues arise.
- This would allow fixed raised planter beds for community gardens longer than 5' in length.
- This would create a consistent interpretation of building height measurement and align the zoning code with the health, safety, and welfare interests of the general public.
- This would allow architects to reduce potential rooftop eyesores for neighbors and the general public, while creating safe and inviting spaces for building occupants.
- This would allow architects to make Portland an even more livable city than it already is, while reducing our environmental impact.

We look forward to hearing your feedback on the proposal, and watching the rest of the Central City 2035 update evolve as we all continue to make the city a better place for everyone.

Please contact us with any questions or requests for clarification. We're happy to discuss any aspect of this proposed modification.

Sincerely,  
SOLTERRA ARCHITECTURE, INC.



Justin Cloyd  
Project Architect