



City of Portland, Oregon
Bureau of Development Services
Land Use Services
FROM CONCEPT TO CONSTRUCTION

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Design Advice Request

Revised DISCUSSION MEMO

Date: September 15, 2023
To: Portland Design Commission
From: Grace Jeffreys, Design & Historic Review Team
503-865-6521 | grace.jeffreys@portlandoregon.gov
Re: EA 23-069476 DA - Centennial Mills
Design Advice Request Memo – September 21, 2023

This *revised* memo is regarding the upcoming DAR on September 21, 2023 for Centennial Mills. The following supporting documents are available as follows:

- Drawings – accessed here (<https://efiles.portlandoregon.gov/record/16282046>). Note, Commissioners who requested hard copies will receive the drawing set by courier.
- Guideline matrix (attached)

I. PROGRAM OVERVIEW

This project includes three separate 5-story buildings over shared underground parking. The buildings will be mixed-use with approximately 277 residential apartment units, 4,100 square feet of retail, and 244 parking stalls total. The property is bounded by NW Naito and the Willamette River and will include the development of the pedestrian greenway trail. The ground floor uses include lobbies, retail units, amenities, services, and dwelling units. The residential part of the ground floors will be raised with dock access at lobbies.

II. DEVELOPMENT TEAM BIO

Architect	Kurt Schultz SERA Architects
Owner's Representative	Tim Ralston MLR Ventures LLC
Project Valuation	\$ 100,000,000

III. FUTURE DESIGN REVIEW APPROVAL CRITERIA:

- Central City Fundamental Design Guidelines
- River District Design Guidelines

IV. POTENTIAL MODIFICATIONS

Subject to the following approval criteria:

- A. Better meets design guidelines. The resulting development will better meet the applicable design guidelines; and
- B. Purpose of the standard. On balance, the proposal will be consistent with the purpose of the standard for which a modification is requested; and
- C. Mitigation of impacts. Any impacts resulting from the modifications are mitigated to the extent practical.

Although not identified in the packet, based on the limited information provided by the applicant the following Modification may be triggered by this proposal:

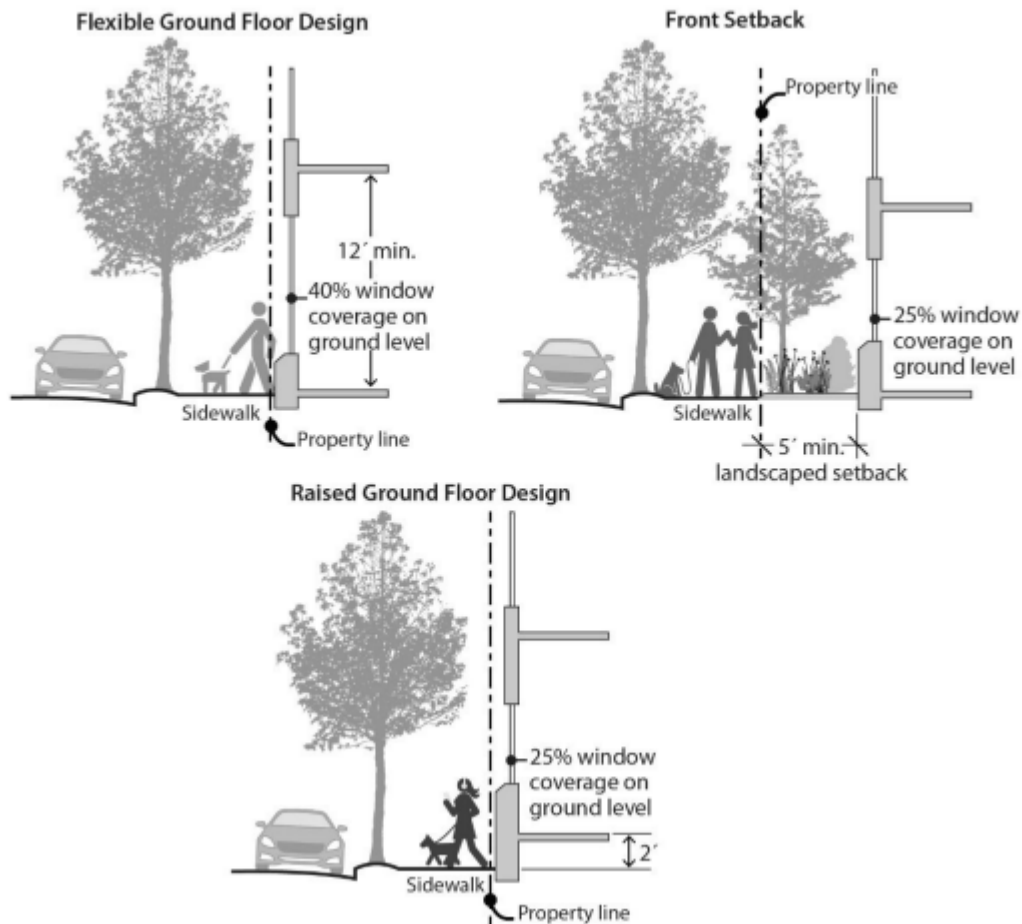
1. Ground Floor Windows (33.510.220):

Requirement: To meet the standards, ground floor windows must be windows that allow views into work areas or lobbies, or be windows in pedestrian entrances. Windows into storage areas, vehicle parking areas, garbage and recycling areas, mechanical and utility areas and display cases attached to outside walls do not qualify. Windows into bicycle parking areas are allowed to qualify for up to 25 percent of the ground floor windows coverage requirement. The bottom of the windows of nonresidential spaces must be no more than 4 feet above the finished grade:

- 1. **Along Naito Parkway**, the ground level facades must have windows that cover at least 60 percent of the ground level wall area. For the purposes of this standard, ground level wall area includes all exterior wall area from 2 feet to 10 feet above the finished grade.
- 2. **All other facades**, since they face a street lot line, sidewalk, plaza, or other publicly accessible open area or right-of-way, they must have windows that cover at least 40 percent of the ground level wall area.

For street facing facades of dwelling units the regulations of 33.130.230.B.4 apply. For the purposes of this standard, ground level wall area includes all exterior wall area from 2 feet to 10 feet above the finished grade. This requires either:

- a. Flexible ground floor design. The ground floor window standard of Subparagraph B.2.a(1) must be met, which requires windows to cover at least 40 percent of the ground floor wall area of street-facing facades that are 20 feet or closer to a street lot line or a publicly-accessible plaza. For the purposes of this standard, ground floor wall areas include all exterior wall areas from 2 feet to 10 feet above the finished grade, and include openings in the walls of structured parking. Additionally, the ground level of the building must be designed and constructed as follows:
- b. Front setback. The portions of the building with residential dwelling units on the ground floor must be set back at least 5 feet from the street lot line. The setback must be landscaped to at least the L1 level and/or hard-surfaced for use by pedestrians; and Windows must cover at least 25 percent of the ground level wall area of the portion of the building with residential dwelling units on the ground-floor.
- c. Raised ground floor. The portion of the building with residential dwelling units on the ground floor must have the finished floor of each residential unit at least 2 feet above the grade of the closest adjoining sidewalk., and window must cover at least 25 percent of the ground level wall area of the portion of the building with residential dwelling units on the ground-floor.



Proposal: Diagrams have not been provided. This standard may be able to be met on Naito, however, this standard is very likely not met on all other facades.

IV. POTENTIAL ADJUSTMENTS

Subject to the following approval criteria:

- A. Granting the adjustment will equally or better meet the purpose of the regulation to be modified; and
- B. If in a residential, CI1, or IR zone, the proposal will not significantly detract from the livability or appearance of the residential area, or if in an OS, C, E, I, or CI2 zone, the proposal will be consistent with the classifications of the adjacent streets and the desired character of the area; and
- C. If more than one adjustment is being requested, the cumulative effect of the adjustments results in a project which is still consistent with the overall purpose of the zone; and

- D. City-designated scenic resources and historic resources in Historic, Conservation and National Register Districts and within the boundaries of Historic, Conservation and National Register Landmarks are preserved; and
- E. Any impacts resulting from the adjustment are mitigated to the extent practical; and
- F. If in an environmental zone, the proposal has as few significant detrimental environmental impacts on the resource and resource values as is practicable; or
- G. Application of the regulation in question would preclude all reasonable economic use of the site; and
- H. Granting the adjustment is the minimum necessary to allow the use of the site; and I. Any impacts resulting from the adjustment are mitigated to the extent practical.

Requirement: NW Naito Pkwy is designated as a Major City Bikeway. Per 33.510.263.B.1, motor vehicle access is not allowed to any street designated as a Major City Bikeway in the Central City Plan District. An adjustment review will be needed in order to gain vehicular access, even if the proposal is only to provide the required on-site loading spaces. PBOT have advised an access focused transportation impact study (TIS) will be needed to determine the appropriate location or locations for driveway access. Applicant is encouraged to plan early for this as the vehicular access locations and deeply affect the design of the buildings and the resultant design review.

Proposal: The proposal shows a shared driveway between buildings A and B centered on the Tanner Springs Outfall Easement. PBOT Staff notes the queuing analysis will need to study if this amount of separation from NW 9th Ave. is sufficient.

V. STAFF ANALYSIS & RECOMMENDED DAR DISCUSSION TOPICS

Staff advise you consider the following among your discussion items on September 21st, which are detailed in the design guideline matrix below. The focus of this DAR is on the Design Review components.

Site Considerations:

- **Top of Bank:** Staff has advised that unless the top of bank is changed, via resource enhancement/mitigation measures (e.g., the removal of the existing seawalls and inlet and the establishment of a more natural bank), the top of bank would be measured around the inlet with the existing seawalls. The top of those existing walls would be considered the top of the bank, and the setback would be measured 50 feet landward.

The proposal shows the top of bank at the flour mill in a substantially different location from where staff advised it is located. Because the location of the top of bank impacts the developable area of the site, staff encouraged the applicant to delay this DAR to allow them time to resolve this critical issue. They chose to move forward without that resolution; therefore, the actual developable part of this site may differ significantly from that shown, especially at the north end of the site where the existing seawall cuts back at the Flour Mill Building.

- **Tanner Springs Outfall Easement.** The proposal shows a shared driveway between buildings A and B centered on the Tanner Springs Outfall Easement. BES have advised that the maintenance trucks will need drivable access, and any grade changes or non-standard

surface improvements that could impede their ability to excavate and access the sewer from the ground surface will require BES Director approval and must be formalized through a recorded encroachment agreement with the City.

The proposal shows stairs within the easement, which may impede future sewer access and therefore not be allowed.

- **Future Bridge across Naito:** PBOT have advised that the proposal will need to leave adequate space on site so that a future pedestrian connection from Fields Park to the west over Naito is not precluded. The bridge landing should be outside of the sidewalk corridor. It is anticipated that an easement will be required to ensure future construction of a bridge landing is feasible. The bridge concepts to date are conceptual, but appear to anticipate the bridge landing within the northwesterly 1/3 of the site perpendicular to NW Naito Pkwy. Staff recommends the design plan for a 20-foot clear easement that does not contain vehicular access within the northwestern 1/3 of the site.

The proposal shows a plaza with structured parking below at the potential bridge landing location, which would likely preclude a future bridge landing here.

- **Flood Hazards:** The site is within the FEMA 100-year Special Flood Hazard Area and Metro 1996 Flood Inundation Area. The adjusted base flood elevation for the site is 33.2 feet NAVD 1988 datum. The flood protection elevation is 35.2 feet NAVD 88 and is two feet above the adjusted base flood.
 - **Residential-Use Structures.** Residential-use structures must have the lowest floor, including basements, elevated at least two feet above the base flood elevation. Below-grade parking garages are considered basements and are thus prohibited below the base flood elevation in residential-use structures. In order to allow a basement parking garage, the structure must include a non-residential-use component to create a mixed-use building.

The proposal shows one retail unit in each building to create mixed-use buildings so below-grade parking will be allowed.

- **In mixed-use structures,** all residential-use areas must be at least two feet above the base flood elevation. Materials, including interior finishes, located below one foot above the BFE must be flood-damage-resistant materials.

The proposal shows residential spaces raised to dock level, which is two feet above the base flood level.

Response to Guidelines: Below is an outline of potential topics to discuss. For further details, refer to the matrix.

- **Context:**
 - Response to the river with open spaces and buildings (accessways, riverfront walkway, and treatment of bank, as well as building massing and orientations)
 - Relationship to the surrounding neighborhood (relationship to Naito crossings at NW 9th, accommodation of possible “future bridge” to west)
 - Reinforcement the Industrial Identity (removal of existing flour mill - aka water-tower building)
- **Public Realm:**
 - Activation of the riverfront, treatment of waterfront and trail.
 - Ground floor activation on all four side (uses, floor levels, depths & heights).

- Ground floor weather protection (facing Naito and accessways).
 - Minimization of garage & loading entry locations, utility locations, back of house.
 - Quality and usability of open space design (2 main accessways, 2 side accessways, greenway)
- **Quality:**
- Coherency of building compositions

CONTEXT		STAFF		COMMISSION	
		+ / -	Comments	+ / -	Comments
A1: Integrate the River		+/-	See comments under A1-1		
	A1-1: Link the River to the Community	+/-	<p>Accessways: The two main accessways (north & south) are provided. However, they are restricted by vehicle areas (south), structured parking below (north) and docks (both). More activation needed of open areas from adjacent buildings on all sides.</p> <p>River walkway. Need to show usability of open spaces to encourage public and residents to use the river frontage.</p> <p>Naito crossings at NW 9th arrives at dock level units & lobby instead of street level retail and/or lobby.</p> <p>Future Bridge: A location for the future "bridge" is shown on page x, however, the north accessway and adjacent buildings on Parcels 2 & 3 do not appear to be designed to accommodate this.</p>		
A2: Emphasize Portland Themes		+/-	<p>Industrial past: Per the 2006 CM framework Plan, this site offers a unique opportunity to reuse the historic flour mill, a significant and iconic piece of Portland' industrial history.</p> <p>Building design may reflect industrial past. More information needed.</p>		

A3: Respect the Portland Block Structures					
	A3-1: Provide Convenient Pedestrian Linkages	+/-	See A1-1		
A5: Enhance, Embellish & Identify Areas		-	Needs a much stronger response to special riverfront location. See A1-1 and A2		
	A5-1: Reinforce Special Areas	-	Needs a much stronger response to special riverfront location. See A1-1 and A2		
	A5-1-1: Reinforce the Identity of the Pearl District Neighborhood	-	Needs a much stronger response to special riverfront location. See A1-1 and A2		
	A5-1-5: Reinforce the Identity of the Waterfront Area	-	Needs a much stronger response to special riverfront location. See A1-1 and A2		
	A5-3: Incorporate Water Features	-	Not enough information submitted to make a determination.		
	A5-4: Integrate Works of Art	-	Not enough information submitted to make a determination.		
A6: Re-use, Rehabilitate, Restore Buildings		-	See A2 – Flour mill as well as most of existing development on site removed except the sea walls.		
A9: Strengthen Gateways		-	Needs a much stronger response to special riverfront location. See A1-1 and A2		
	A9-1: Provide a Distinct Sense of Entry and Exit	-	Needs a much stronger response to special riverfront location. See A1-1 and A2		

C1: Enhance View Opportunities		+/-	<p>View Corridors. Required view corridors infringed upon by docks and stairway accesses, and possibly by structured parking below. More activation of open areas needed from adjacent buildings on all sides.</p> <p>Communal terraces at Parcels 1 and 2 should have links to the Greenway. It is unclear how the Parcel 3 terrace is accessed and used.</p> <p>More individual terraces and balconies facing the river should be provided.</p> <p>Glazing. Generous glazing shown facing the river will be important to maintain as project develops.</p>		
	C1-1: Increase River View Opportunities	+/-	Needs a much stronger response to special riverfront location. See C1		
C4: Complement the Context of Existing Buildings		-	<p>See A1-1 and A2.</p> <p>Building connections to adjacent accessways at southern & northern property lines should be strengthened.</p>		
PUBLIC REALM		STAFF		COMMISSION	
		+ / -	Comments	+ / -	Comments
A4: Use Unifying Elements		+/-	<p>Docks reference industrial past.</p> <p>More info needed on usability of publicly accessible open</p>		

		<p><i>areas.</i> <i>Buildings need a stronger relationship to the river.</i></p>		
A7: Establish and Maintain a Sense of Urban Enclosure				
A8: Contribute to a Vibrant Streetscape	+/-	<p>Accessway connections. <i>Building connections to two main accessways as well as accessways at southern & northern property lines should be strengthened.</i></p> <p>Ground level height. <i>The 15' high ground level from dock level creates a strong and robust building base which will be important to maintain as project develops.</i></p> <p>Docks. <i>The docks respond to the flood level as well as the industrial past of the site. They also, however, can create barriers between the pedestrian level and the building uses inside.</i></p> <p><i>To create stronger connections to pedestrians at the most important locations (Naito and the 2 main accessways), locate street level retail or other public oriented uses at all four building corners facing the two main accessways, and shift the raised residential lobbies to midblock facing Naito.</i></p> <p>Retail units – size and orientation. <i>The street level retail units at Parcels 1 and 2 will help activate Naito; however, they should also relate more strongly to the accessways they abut.</i></p> <p><i>The retail unit at Parcel 2 appears small, it may need to be larger and deeper to be viable.</i></p>		

		<p><i>The small size as well as the mid-block, dock level location of retail unit at Parcel 3 makes it unviable.</i></p> <p>BOH. BOH elements should be minimized/shifted away from Naito and river frontage.</p> <p><i>Garage entries have been located away from Naito providing potential for better activation of the street.</i></p>		
	A8-1: Design Fences, Walls, and Gateways to be Seen Over			
B1: Reinforce and Enhance the Pedestrian System	-	See A8.		
	B1-1: Provide Human Scale to Buildings Along Walkways	-	See A8.	
B2: Protect the Pedestrian	-	See A8		
B3: Bridge Pedestrian Obstacles				
B4: Provide Stopping and Viewing Places	-	See A1 and A8 above.		
B5: Make Plazas, Parks & Open Space Successful	-	See A1 and A8 above.		
	B5-1: Recognize the Roles of the Tanner Creek Parks	-	Not enough information submitted to make a determination.	
B6: Develop Weather Protection	-	As mentioned under A8, Naito as well as the 2 main accessways would be better activated if street level retail were located at all 4 building corners. The weather protection could then wrap the corners providing pedestrian cover into the accessways as well as Naito.		

B7: Integrate Barrier-Free Design			<i>It will be important that below-grade parking does not interfere with the river connections at the accessways, including the ramping and stair systems</i>		
C3: Respect Architectural Integrity					
	C3-1: Integrate Parking	+/-	<i>Parking is located below-grade level at Naito. However, the solid walls will be exposed on other sides, including facing the greenway.</i> <i>It will be important that below-grade parking does not interfere with the river connections at the accessways, including the ramping and stair systems</i>		
C6: Develop Transitions Between Buildings & Public Spaces		+/-	<i>The dock level provides a transition from the public to the residential level.</i> <i>It makes sense for the retail to be at the street level and lobbies and residential to be up at the dock level, and the retail in Parcel 3 should be shifted to the corner at the accessway and dropped to the street level.</i>		
C7: Design Corners that Build Active Intersections		+/-	<i>Naito as well as the 2 main accessways would be better activated if street level retail or other public facing use were located at all 4 building corners and the residential lobbies, which are up at dock level, were to be all located midblock facing Naito.</i>		
C8: Differentiate the Sidewalk Level of Buildings					
C9: Develop Flexible Sidewalk Level Spaces		-	<i>See A8 and C7 above.</i>		

	C9-1: Reduce the Impact of Residential Unit Garages on Pedestrians	+/-	Parking is internalized & some associated BOH elements are on the east-west accessways. BOH facing Naito and/ or river should be minimized. At accessways, driveway and below grade parking may interfere with quality of these important publicly accessible spaces.		
	C10: Integrate Encroachments	+/-	Parking is located below the future bridge landing location, which will preclude a future bridge.		
	C11: Integrate Roofs and Use Rooftops		Not enough information submitted to make a determination.		
	C12: Integrate Exterior Lighting		Not enough information submitted to make a determination.		
	C13: Integrate Signs		Not enough information submitted to make a determination.		
QUALITY AND PERMANENCE		STAFF		COMMISSION	
		+ / -	Comments	+ / -	Comments
	C2: Promote Permanence & Quality in Design		Not enough information submitted to make a determination.		
	C5: Design for Coherency		Not enough information submitted to make a determination.		

Attachments: Drawings dated 9/8/2023