



City of Portland

Design Commission

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Date: May 10, 2016
To: Barry Manning, Senior Planner, Bureau of Planning and Sustainability
From: Portland Design Commission
Subject: Mixed Use Zone Project, March 2016 Proposed Draft Comments

Thank you for the opportunity to comment on the Mixed Use Zone Project [MUZ] March 2016 Proposed Draft. The March 17, 2016 presentation on the changes to the September 2015 MUZ Discussion Draft was very helpful. Many aspects of the original concept plans and code language have been simplified and the overall project presents vast improvements to the current zoning code, particularly in the areas of providing stronger tools to better activate the streetscape at the ground floor level.

This memo is focused on highlighting several areas of concern with associated recommendations:

1. 33.130.210 Height/33.130.230.B. The allowance for 3'-6" of additional height for parapets and railings promotes commercial building roof edge articulation and activation of the rooftops. However, to allow further flexibility within the current height limitations, allowing for an additional 3'-6" in height at the ground floor level, whether for flexibility of ground floor residential conversion, or to incentivize taller ground floor commercial spaces, is strongly encouraged.
2. Minimum FAR. Land in Portland's densest areas of town should not be underutilized. The Commission strongly believes a minimum FAR should be established for all mixed-use zones.
3. 33.130.222 Building Length and Façade Articulation. Increasing the maximum building length to from 100' to 200' is a positive move. But the revised code needs to be careful in how and where these new requirements for façade articulation are to be applied. They add cost and complexity to construction.
4. 33.130.230 Ground Floor Windows. The minimum Ground Floor Window [GFW] standard should be increased to 50% for all street facing frontages, and also not reduced for secondary frontages. Options for lowering the standard on one frontage or another could be allowed through averaging 50% across all frontages, with a minimum requirement at each street frontage.
5. 33.130.230.D Ground Floor Window Standard for Ground Floor Residential. All of the three options should require a pedestrian connection from the street for each unit. As currently written, 33.130.230.D.2 and D.3 [pages 131 & 133] would only create raised first floor levels and/or landscaped setbacks. The increased window requirements, while helpful, only raise the height and amount of otherwise shuttered ground floor windows. Pedestrian entrances directly into these adjacent residential spaces are critical to activating the streetscape.
6. Ground Floor Residential Uses. Allowing ground floor residential units remains a significant issue. Ground floor residential should only be allowed to front a Corridor if it is a Live/Work unit with an individual entrance and a mezzanine for the more private uses of

the residential program. (Mezzanines are easily achievable when an additional 3'-6" in height is afforded to ground levels.) Ground floor residential facing side streets that are not designated Corridors is encouraged, but should only be allowed when each unit includes an individual entrance.

7. 33.270.200 Planned Development, C. Energy Efficient Buildings. It is not clear what the requirement of "Energy Efficient Buildings" set by the Bureau of Planning and Sustainability would be as noted in these criteria. The otherwise common Leadership in Energy and Environmental Design [LEED] certification is likely a difficult standard to enforce because the program may change significantly over the next 20 years. Other programs with aspirational environmental goals may be appropriate. In any case, it seems acceptable to have more than one accepted standard.
8. 33.520 - Division Street, 33.545 - Lombard Street, and 33.575 Sandy Boulevard. As these three main street corridors will be subject to the two-track design review process, it is critical that the Community Design Standards are rewritten and in place at least at the same time MUZ is implemented, if not sooner.

Sincerely,



David Wark, Chair of the Portland Design Commission

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cc: Bureau of Planning and Sustainability
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