

# AIA/APA/ASLA Urban Design Panel

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

Date: May 6, 2016

To: Planning and Sustainability Commission  
Portland, Oregon

## MIXED USE ZONES – PROPOSED DRAFT

The Urban Design Panel is sponsored jointly by the Oregon and/or Portland chapters of the American Institute of Architects, the American Planning Association and the American Society of Landscape Architects, and composed of urban design professionals from those 3 organizations.

The Panel has been closely following the development of this proposal for the last couple of years with great interest. We would like to recognize and thank BPS staff members Barry Manning and Bill Cunningham for involving the UDP over the last couple of years in the development of this proposal. It was a tough balancing act, and we sincerely appreciate their efforts. The MUZ is critical to the successful implementation of Portland's evolution to a more sustainable, livable, and affordable city, and we support its adoption. We do, however, see some areas where we believe changes need to be made to ensure the new code language will meet those worthy overall objectives.

- 1.) The UDP strongly believes that the recently added "center of centers" language is not appropriate for a couple of reasons, and should be removed:
  - a. It reduces the ability to place more dense development exactly where it is most needed and appropriate, in the most transit and walking friendly environments. This provision would seem to directly contradict several proposed Comprehensive Plan policies, especially 4.20 Walkable Scale, which states "Focus services and higher-density housing in the core of centers to support a critical mass of demand for commercial services and more walkable access for customers". While we fully support the need to protect genuinely historic features, the key to the success of the MUZ is balancing the evolution of a dynamic urban environment with the preservation of properly evaluated structures that truly represent an important period in that evolution, not all buildings. We understand that there are mitigating provisions in the proposal that would attempt to make up for the reduced height, but the net effect is liable to be confused redevelopment priorities, stagnation and a commensurate reduction in intense residential redevelopment in key centers.
  - b. It overly complicates the redevelopment of these key places. By placing another set of conditions on these areas, the new ordinance will become much more complex and hard to implement well. It would be far better to rely on design guidelines and/or standards to ensure redevelopment is compatible with existing structures, designated as historic, as change happens.
- 2.) That being said, we have significant concerns about the ability of the current design review process to adequately handle the substantial increase in project load that extension of design

review to the MUZ areas implies. The Design Overlay Zone Assessment just getting underway will provide significant recommendations for improvements to that process. The UDP has made recommendations over the last 2 years to revise and streamline the DR process, and we will strongly support the DOZA effort. However, it is imperative that the City make a firm commitment to quickly implementing the recommended changes so that when the MUZ ordinance goes into effect the DR structure and process are fully capable of handling the anticipated projects. One additional suggestion for DOZA is that it look at the evolving MUZ language to determine where there may be areas to improve the MUZ as it moves toward adoption.

3.) As number 1. above indicates, the UDP is very concerned that the MUZ enable full realization of the full floor area ratios envisioned through the higher density designations in the new Comprehensive Plan. We recognize that the tradeoff between a reduction in allowed FAR in some areas, along with an accompanying elimination of other bonus options, was made in order to accommodate and encourage greater use of the affordable housing bonus. However, some of our members are very concerned that this bonus tradeoff will not achieve this objective. We also understand that recently approved inclusionary zoning provisions will be incorporated into the MUZ in the next 6-9 months. As that happens the existing FAR, height and bonus language needs to be carefully re-examined to ensure that the City will effectively achieve the maximum FAR in MUZ areas, to the extent practical. The UDP strongly supports the City's priority to achieve as much new affordable housing as possible within these centers and corridors. One way to ensure that happens is to make the new code as straightforward and inexpensive to implement as possible.

4.) There are two provisions that have been reduced or eliminated from this proposal that we would like to see reconsidered. We believe that the three (3) foot additional height provision for active ground floor uses should be available in all MUZ zones. This provision, if applied in all MUZ areas, will simplify administration of the code and add much needed flexibility for these types of uses. The other is to make provision of open space part of the bonus equation again. It does not rise to the level of importance of affordability, but it does make these redevelopment projects much more human in scale, and more acceptable and enjoyable for the entire neighborhood.

The UDP is ready to work closely with staff to help make the changes necessary to achieve the best mix of provisions to create a model ordinance for redevelopment in these critical parts of the city as they evolve in the coming years. Along with the Central City, these MUZ areas are where the new Portland will emerge. It is imperative that we get both the plans and the ordinances right to make sure we get the best results possible.

Sincerely,

Executive Committee of the Urban Design Panel

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cc: *American Institute of Architects/Portland Chapter, American Planning Association/Oregon Chapter  
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