



City of Portland

Design Commission

1900 SW Fourth Ave., Suite 5000
Portland, Oregon 97201
Telephone: (503) 823-7300
TDD: (503) 823-6868
FAX: (503) 823-5630
www.portlandonline.com/bds

Date: July 26, 2016
To: Portland Planning and Sustainability Commission
From: Portland Design Commission
Subject: Central City 2035 Proposal Draft comments

The Portland Design Commission appreciates the opportunity to review and comment on the June 20, 2016 Proposed Draft of Central City 2035. This planning project will shape development that is supportive of the Comprehensive Plan goals and manage growth in a manner that maintains healthy and vibrant Central City Quadrants.

The Design Commission notes that there are many positive improvements proposed in the Central City 2035 document. This memo highlights several areas of concern with proposed recommendations.

1. 33.510.200 Floor Area Ratios & 33.510.210 Height. The Design Commission recommends these sections mandate minimums in order to achieve the density goals and desired neighborhood characteristics envisioned in Central City 2035. As we are seeing with the development of low-rise buildings in South Waterfront, the goals and aspirations for higher density in some subdistricts of the Central City is not being realized. Given the pace of development and the historic underutilization of land within the Central City, the Commission is concerned that allowing buildings to be built below—sometimes far below—established FAR and height targets raises the question of how much land will actually be developed in a manner consistent with the goals of Central City 2035. If minimum FARs and minimum heights are established, a target of 70%-80% of the Central City 2035 goals should be considered.
2. 33.510.205 Floor Area Bonus and Transfer Options, D.1 Transfer of Floor Area from an Historic Resource. Incentivizing the protection of historic resources is sound policy. However, the Design Commission advises that the structural improvements outlined in the Oregon Structural Specialty Code will be revised and expanded over time, and may render the goal of seismic improvements to historic resources irrelevant or unachievable. The Design Commission also advises that effective enforcement tools be in place to ensure phased seismic improvements are completed as scheduled. It may be appropriate to revise the standards or defer them to another venue—such as the Administration Rules—where they can be more readily adapted over time.
3. 33.510.205 Floor Area Bonus and Transfer Options, C.2.a Affordable Housing Bonus Option. The Design Commission wholeheartedly supports the goal of broader and deeper affordability in our community's housing stock. We want to clearly understand the impact of new inclusionary zoning standards (SB 1533, effective June 2, 2016) in order to be effective advocates for affordable housing. The Commission would welcome regular briefings from BPS and Portland Housing Bureau (PHB) staff as they develop regulations, enforcement tools and assess the impact to existing and new financial programs.
4. 33.510.205 Floor Area Bonus and Transfer Options, C.2.g Central Eastside Subdistrict Industrial Space Bonus. As stated in this section, an additional 1 to 1 FAR bonus for Industrial Office Use may be earned for proposals that provide at least 33%, or 5,000 square feet, of industrial uses at the ground floor. The majority of the Design Commission

would like to see a tiered bonus, with a higher percentage of industrial use at the ground floor meriting greater flexibility in both the FAR square footage and allowed uses within that square footage.

5. 33.510.223 Bird-Safe Exterior Glazing. Our built environment can and should respond to species protection to the maximum extent possible. However, there is potential conflict between our community's desire for ground floor retail and commercial storefronts (window and active use standards) and fritted or patterned glazing. BPS's research into alternate methods for protecting birds shared at the July 21, 2016 Design Commission Briefing should continue. These alternate methods may include Ornalux glazing (a UV coated product that is fully transparent to humans but not to birds), and/or awnings that reduce reflection at the ground floor and minimize bird strikes.
6. 33.510.225 Ground Floor Active Uses. The removal of residential uses as an approved active use greatly improves this standard's effectiveness, as does the addition of restrictions on storage and bicycle parking. Other non-active uses the Design Commission doesn't consider acceptable means of meeting ground floor standards are display cases, utility rooms, and other back-of-house support spaces.
7. 33.510.243 Eco Roofs, & 510.244 Low Carbon Buildings. The Design Commission recommends these development standards be adjustable, and that additional funding sources be identified to support affordable housing development. The proposed standard requires developments register for the Leadership in Energy and Environmental Design (LEED) program but doesn't require certification. Any type of 3rd party program is likely to be revised and expanded over time and may render the Central City 2035 goal irrelevant or unachievable. Furthermore, if a 3rd party program is found to be necessary, other programs with aspirational environmental goals may be more appropriate for a given building program. If a 3rd party standard is necessary, the Commission would like to see more than one accepted standard.
8. Map Amendments. This is a housekeeping issue. The current maps are very low resolution. High resolution maps with legible street names will make reading electronic copy of Title 33 much easier. High resolution maps could be accessible through a separate link.

Thank you for your time and consideration of our comments. Please do not hesitate to contact us with any questions.



David Wark, Chair of the Portland Design Commission

cc. Rachel Hoy, Senior Planner, Bureau of Planning and Sustainability
Portland Design Commission