

**Responses to Division Design Initiative “Top Ten Recommendations for Portland” (Comp Plan testimony)
and DDI Comments on the Mixed Use Zones Project Discussion Draft**

Testimony/Comment	Policy Response	Related MUZ Code Amendments
Comp Plan Testimony (DDI Top Ten Recommendations)		
1. Improve notification and enable constructive community engagement about growth.	Addressed in part by Chapter 2 (Community Involvement) Policy 2.24 Early involvement. Improve opportunities for interested and affected community members to participate early in planning and investment processes, including identifying and prioritizing issues, needs, and opportunities; participating in process design; and recommending and prioritizing projects and/or other types of implementation.	Neighborhood contact requirement being expanded to apply to larger projects in all mixed use zones. Staff recommends that a follow-up project update neighborhood contact procedures.
2. Close the residential floor area ratio gap now (include residential in FAR calculations).	About implementation rather than policy.	No proposal to change regulations to count residential as part of floor area limits prior to effective date of the MUZ code amendments. There is not a legal mechanism to implement that change without the required legislative process.
3. Add permit review criteria for assessing compatibility with neighborhood context. Also includes request for TDM approaches for projects with no parking.	<p>Policy 4.3 Site and context. Encourage development that responds to and enhances the positive qualities of site and context — the neighborhood, the block, the public realm, and natural features.</p> <p>Policy 9.53 New development. Create and maintain TDM regulations and services that prevent and reduce traffic and parking impacts from new development and redevelopment. Encourage coordinated area-wide delivery of TDM programs. Monitor and improve the performance of private-sector TDM programs.</p>	<p>MUZ Project proposes to add the d-overlay to SE Division and other inner Southeast corridors, which will provide the strongest tool for reviewing the design of development allowed by state law.</p> <p>Some of the requested permit review elements could be considered in future projects updating neighborhood contact requirements and design review procedures, but would not meet the clear and objective standards required for base zone regulations.</p> <p>TDM requirements proposed in MUZ project.</p>
4. Develop density transition zones and Foster the “Missing Middle.”	<p>Policy 4.15 Residential area continuity and adaptability. Encourage more housing choices to accommodate a wider diversity of family sizes, incomes, and ages, and the changing needs of households over time. Allow adaptive reuse of existing buildings, the creation of accessory dwelling units, and other arrangements that bring housing diversity that is compatible with the general scale and patterns of residential areas.</p> <p>Policy 4.30 Land use transitions. Improve the interface between non-residential uses and residential uses in areas where commercial or employment uses are adjacent to residentially-zoned land.</p>	<p>Residential Infill Project may consider possibilities for additional housing options close to centers and corridors.</p> <p>Upcoming Multi-Dwelling Development project will also address medium-density housing types.</p> <p>The Residential and Open Space Zoning Update is reviewing areas where the residential Comprehensive Plan map designation is higher than the existing residential zone, including areas in southeast that could be upzoned to mid-density residential zoning of R2.5 or R1.</p>
5. Create incentives for reuse and preservation of existing buildings with special community character.	<p>Supported by policies 4.26, 4.27, the Historic and Cultural Resources policies (4.45 – 4.53), and policies 4.56 and 4.58.</p> <p>Policy 4.26 Protect defining features. Protect and enhance defining places and features of centers and corridors, including landmarks, natural features, and historic and cultural resources.</p> <p>Policy 4.27 Historic buildings in centers and corridors. Protect and encourage the restoration and improvement of historic resources in centers and corridors.</p> <p>Policy 4.45 Historic and cultural resource protection. Protect and encourage the restoration of historic buildings, places, and districts that contribute to the distinctive character and history of Portland’s evolving urban environment.</p>	<p>MUZ project is expanding options for historic TDR (but not available for properties that are not documented historic resources), and staff are considering zoning code approaches for older, lowrise commercial storefront areas to continue their scale and characteristics.</p> <p>Future historic preservation work will expand the HRI and consider additional preservation strategies.</p>

	<p>Policy 4.53 Community structures. Encourage the adaptive reuse of historic community structures, such as former schools, meeting halls, and places of worship, for arts, cultural, and community uses that continue their role as anchors for community and culture</p> <p>Policy 4.56 Rehabilitation and adaptive reuse. Encourage rehabilitation and adaptive reuse of buildings, especially those of historic or cultural significance, to conserve natural resources, reduce waste, and demonstrate stewardship of the built environment</p>	
6. Relate building height to street width and consider nodal focus.	Policy 4.22 Relationship between building height and street size. Encourage development in centers and corridors that is responsive to street space width, thus allowing taller buildings on wider streets.	<p>MUZ project is proposing upper-level building step backs along narrower streets in the denser CM3 zone. Civic vs. Neighborhood Corridor designations have been a consideration in mapping of the commercial/mixed use zones.</p> <p>Possibilities for a finer grained nodal pattern of zoning should be addressed in future local area planning.</p>
7. Consider incentives in mixed use proposal for community amenities.	3.3.c. Encourage use of community benefit agreements to ensure equitable outcomes from development projects that benefit from public facility investments, increased development allowances, or public financial assistance. Consider community benefit agreements as a tool to mitigate displacement and housing affordability impacts.	Some of the MUZ bonuses and other provisions under consideration relate to requested amenities/outcomes, including bonuses for affordable housing, high-performance buildings, and historic preservation (TDR).
8. Incorporate solar policy into zoning code amendments to support more high performance buildings and minimize/mitigate solar shading of adjacent infill.	<p>Policy 4.11 Access to light and air. Provide for public access to light and air by managing and shaping the height and mass of buildings while accommodating urban- scale development.</p> <p>Policy 4.12 Privacy and solar access. Encourage building and site designs that consider privacy and solar access for residents and neighbors while accommodating urban-scale development.</p> <p>Policy 4.63 Energy efficiency. Encourage and promote energy efficiency significantly beyond the Statewide Building Code and the use of solar and other renewable resources in individual buildings and at a district scale.</p> <p>Policy 4.66 Energy-producing development. Encourage and promote development that uses renewable resources, such as solar, wind, and water to generate power on-site and to contribute to the energy grid.</p>	<p>MUZ project modelled solar access as part of developing building height/scale regulations, and the draft regulations include requirements for building height step downs and setbacks adjacent to residential zones.</p> <p>Consideration of opportunities for greater scale on north-south corridors (versus east-west) is a zone mapping issue and could be a possibility in future local area planning.</p>
9. Enhance/maintain community livability through access to sun, air, light, privacy and public views for current and new residents/businesses.	<p>Related to policies 4.11 and 4.12 above.</p> <p>Policy 4.43 Building placement, height, and massing. Maintain regulations and other tools related to building placement, height, and massing in order to preserve designated significant scenic resources.</p>	<p>See above (regarding #8).</p> <p>MUZ project is also proposing increasing requirements for landscape screening adjacent to residential zones, preventing balconies from being located in setback areas, and is proposing increased setbacks for residential windows located close to property lines.</p>
10. The City should employ broader tracking of and accountability for development impacts.	About implementation rather than policy.	Many of the requested project-specific impact reviews (health and environmental impacts, community and economic impacts) would require discretionary review and would likely not comply with state requirements for clear and objective standards for housing. These topics are considerations in the development of the Comprehensive Plan, mapping of zones, and creation of regulations.

