



**Bureau of Planning and Sustainability**  
Innovation. Collaboration. Practical Solutions.

## Portland Planning and Sustainability Commission

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April 25, 2017

Mayor Ted Wheeler and Members of Portland City Council  
Portland City Hall  
1221 SW Fourth Avenue  
Portland, OR 97204

### **Subject: Design Overlay Zone Assessment (DOZA) Report**

Dear Mayor Wheeler and City Commissioners:

The Planning and Sustainability Commission (PSC) had the opportunity to review the Design Overlay Zone Assessment (DOZA) Final Report and look forward to testifying in person at your hearing on April 26, 2017. As stewards of the Comprehensive Plan and Climate Action Plan, we are keenly interested in developing and maintaining the Zoning Code to carry out the goals and policies of those plans.

Portland's design overlay zone applies to two types of areas: places where the City intentionally encourages high-density development – centers and corridors – to accommodate growth, and places that have a special scenic, architectural or cultural value. As these areas change over time, the PSC is vested in ensuring high-quality development and an efficient design review process that aligns with our recently-adopted Comprehensive Plan goals and policies. We therefore support the recommendations in the DOZA Final Report.

The PSC formed a subcommittee to discuss the draft recommendations and identified areas of specific concern or importance. During the next phase of DOZA, we encourage additional focus and refinement in the following areas:

- **A1a. We support restructuring the thresholds for Gateway** and allowing development in the district to use clear and objective standards. Like other neighborhoods in transition, Gateway needs the right tools to offer clear guidance while encouraging redevelopment.
- **A1a. The report recommends the same thresholds for all of the Central City. We suggest differentiating between more intense Central City subdistricts, such as Downtown, and less intense subdistricts.** The Comprehensive Plan recognizes the importance in maintaining the character and uniqueness of our neighborhoods – the design review process should as well.



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- A1b. The **Design Review thresholds should be right-sized based on impact**. Removing regulatory barriers can allow innovation and testing of new systems and can give small developers and property owners a chance to succeed. This furthers equity goals of the Comprehensive Plan. Determining the specific metrics for thresholds for design review is critical; therefore, we recommend additional refinement on the scale, location and process that trigger different levels of review.

The **refinement of the thresholds needs to be done in conjunction with updating of the Community Design Standards and Community Design Guidelines**. This would ensure projects of lesser impact are able to meet a clear set of standards that maintains the unique character of our centers and corridors while removing unnecessary regulatory burdens.

- A5. **Community Involvement** is a critical component of the Comprehensive Plan. We strongly support the recommendation to improve public notification and ensure inclusivity. In addition to the report’s recommendations, we propose providing “just-in-time” training to people receiving public notice – such as an online primer or webinar. This training would assist stakeholders in understanding the intent of the design review process while clarifying the purview of the Design Commission and what is appropriate for the public to comment on during design review hearings.
- A6b. The PSC used to have a designated member on the Design Commission to provide stronger continuity and alignment between the two commissions’ work. In the absence of that, we suggest that the Design Commission **present their annual report to the Planning and Sustainability Commission**, in addition to reporting to City Council.
- B1. The **purpose of the d-overlay** needs to be updated to reflect the goals of the Climate Action Plan and Comprehensive Plan, with particular attention to equity; reconcile the tension between compatibility and change; and outline the objectives of discretionary review.
- B1c. We support the consultant’s reasoning for why **zoning regulations** establish floor-to-area ratios (FAR) and height and that reductions are **not within the purview of the design review system**. To meet the Comprehensive Plan density and community involvement goals, it is critical that the tension between projects “responding to context” and the Comprehensive Plan density goals be clarified in the next phase of this project.
- B3. We encourage staff to continue the discussion about the balance of the **three tenets** in the implementation phase of DOZA and recommend that prioritization of the tenants be reviewed against the goals in the Comprehensive Plan. In particular, the tenant of **quality and permanence** needs to be clearly defined and understood by all.

We encourage **fast tracking some of the recommendations** and recommend that staff explore options – such as implementing process changes – that do not require Zoning Code amendments.

There are many parallels between design review and **historic resource review**. Many of the report’s recommendations should be considered for historic resource review and the Historic Landmarks Commission as well.



Design Review is not broken, but it does need improvement in order to succeed. The implementation of these recommendations is critical to support the increased intensity of development in our centers and corridors while ensuring the public has the opportunity to engage in the process. Overall, we believe that further development and implementation of the DOZA recommendations will ensure that we effectively support high-quality design during this period of rapid growth in our city.

Sincerely,



Katherine Schultz

Chair

