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## Portland Planning and Sustainability Commission

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November 15, 2019

Portland Design Commission

1900 SW 4<sup>th</sup> Ave

Portland, OR 97201

Dear Chair Livingston and members of the Design Commission,

The Planning and Sustainability Commission (PSC) is pleased to offer our testimony to you on the Design Overlay Zone Amendments (DOZA) project. Thank you to those of you who were able to join us for our combined commissions' staff briefing on October 8, 2019, and the public hearing on October 22, 2019. Those sessions provided both our commissions time to hear about the project from staff and the public. As we start our deliberations separately now, the PSC offers the following suggestions about the Portland Citywide Design Guidelines to you for consideration as you are the recommending body for that portion of the project.

At the November 12, 2019, PSC meeting, we reviewed the Portland Citywide Design Guidelines in relationship to the three tenets and discussed our support and proposed changes/suggestions to the ten guidelines and background information (both text and images). The background information helps frame the intent, so we reviewed that language closely to ensure the intent is clear for each guideline. As you know, the three tenets are benchmarks that frame how the design standards and the Portland Citywide Design Guidelines are written. While the standards, which the PSC will dive into during our upcoming work sessions, provide clear and objective measures, the guidelines provide criteria that offer flexibility and encourage innovation. These parallel regulations both strive to achieve the same outcomes rooted in these three tenets.

Page references included within our testimony refer to [Volume 3: Portland Citywide Design Guidelines](#) in the DOZA Proposed Draft. Staff helped frame our discussion based on the three tenets, and the PSC offers the below suggestions for each guideline:

### Context (Guidelines 1, 2, 3, 4)

#### **Guideline 1: Respond to the citywide urban design framework by building on pattern area characteristics and advancing aspirations of center, corridor, and transit station designations.**

In general, the PSC concurs with the staff proposal and background. Regarding the Inner Neighborhoods (page 15: paragraph 2, sentence 3), we suggest replacing "complement" with "acknowledge" to better



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reflect the historic natures of the context. “Complement” can mean mimic or replicate, but that shouldn’t be the intent. A more flexible way to respond to historic context is with the word “acknowledge”.

“New development can **acknowledge** the form and texture of existing older buildings and street patterns while adding density.”

For Eastern Neighborhoods, “create mid-block connections” (page 15: paragraph 5, sentence 3) is something we talked about in the Better Housing by Design project. In this language, it makes it seem that the developer is required to provide the connection, so the PSC prefers “encourage” or “explore” since it’s not a full requirement.

“At the same time, development should **explore [encourage]** mid-block connections that make it easier to access community destinations.”

### **Guideline 2: Build on the character and local identity of the place.**

The PSC particularly focused on the call-out box, “How are character and local identity defined?” (page 23, bottom right). In addition to the six bullet points currently proposed, the PSC suggests adding a bullet about preserving resources that serve a community, for example, culturally-specific commercial establishments.

We would also add a bullet point to add awareness of an area’s specific demographics to better support culturally-responsive design. This is similar but separate to the “site and area observations” point. We did not discuss the specific language but propose staff work with the Design Commission to add a culturally-specific point to complete this list.

### **Guideline 3: Create positive relationships with adjacent surroundings**

The PSC proposes a few changes to the background language in Guideline 3:

- Page 26, paragraph 2, sentence 2: ~~strikeout the last phrase “...recognizing underlying zoning in addition to the current adjacent building scale and form.”~~

“Sites should be designed to take into account the conditions on the ground, while considering the city’s evolution and its future growth, ~~recognizing underlying zoning in addition to the current adjacent building scale and form.~~”

- PSC members prefer the use of the word “acknowledge” instead of “relate to” (page 27, paragraph 1, sentence 2) for the same reason we suggest “acknowledge” in Guideline 1.

“While new infill may result in a taller building than its neighbors, it should **acknowledge** adjacent historic resources, even while materials and architectural styles may be very different.”

- A component of the background information that's as important as the language is the images. In guideline 3 in particular, PSC members are concerned that there are too many (5 out of 8) images that show step-downs as the example. The PSC recommends changing these out to show other options for design that may be more context-appropriate. Step downs were discussed extensively during the Mixed Use and Better Housing by Design projects, so those requirements are already in the base zones.

**Guideline 4: Integrate and enhance on-site features and opportunities to meaningfully contribute to a location's uniqueness.**

The PSC appreciates this guideline and its encouraging design outside of "one size fits all" since Portland's distinct areas and neighborhoods are what make Portland itself. The importance of location, surroundings, and integrating new development is primary. Natural and green resources are just as important, so the PSC suggests striking the word "large" from the description (page 30, paragraph 3, sentence 2) to provide flexibility and highlight the important of green features, regardless of size.

["Incorporating natural resources, such as large trees, streams, wetlands, rocky outcrops, or other geological attributes, preserves resources while rooting development specifically to a site."](#)

**Public Realm (Guidelines 5, 6, 7)**

**Guideline 5: Design the sidewalk level of buildings to be comfortable, pleasant, and human-scaled.**

PSC members are supportive of components for Guideline 5. We particularly like the second sentence in the background (page 34, paragraph 1) that describes what "comfortable" means in the context and names the why and how. The images in this guideline offer suggestions and a variety of ways this guideline can be achieved.

The PSC discussed several components the Design Commission may want to consider or explore adding to the background language and/or design approaches. Items to be considered include: variety; greenery; culturally-specific characteristics; features that contribute to neighborhood stability; and language that evokes accessibility. The PSC did not, however, come to a consensus and doesn't have specific changes to the language in the Proposed Draft.

**Guideline 6: Provide opportunities to pause, sit, and interact.**

The discussion around this guideline was one of the most robust of our work session. Understanding we are talking about private property here, we still want to ensure the openness and welcoming factors contribute to the development.

Specific to the phrasing of the guideline itself, we suggest making it even more clear that development should provide supportive space for people to feel welcome and safe and should allow space for people to rest, especially under our current housing shortage:

["Guideline 6: Provide opportunities to rest and be welcome"](#)

The definition of “rest” was quite involved. We think the background should address this more fully and clarify the intent of the word. The PSC will talk about this further this at our November 19, 2019, work session and will provide suggested language to the Design Commission after our discussion.

### **Guideline 7: Minimize and integrate parking and building services**

Discussion for this guideline focused specifically around the words in the guideline title. PSC members propose using the word “integrate” and striking “minimize and” at the beginning. We discussed the guideline in its relation to both auto and bike parking, in which we believe the intent is to minimize auto parking, but not to minimize the appearance of bike parking.

### **Guideline 7: Integrate parking and building services**

Additionally, the upper left image on page 44 shows integrating long-term bicycle parking into the design of the site. However this visual doesn’t adhere to the security standards for the updated Bike Parking code, which will be in effect before DOZA is adopted. PSC members have asked staff to update this image accordingly.

### **Quality (Guidelines 8, 9, 10)**

#### **Guideline 8: Support the comfort, safety, and dignity of residents, workers, and visitors through thoughtful site design**

PSC members concur with Guideline 8 as stated as well as the background verbiage and supporting images. This is a thoughtful guideline that thinks about dignity and everyone who uses the space.

#### **Guideline 9: Design for quality using enduring materials and strategies with a clear and consistent approach.**

We had two recommendations about the descriptions of the Design Approaches offered in relationship to the diagram on page 51.

For the description of “Quality of Materials” under Design Approaches, PSC members questioned the use of “execution of details” and what it specifically means or intends. It also may be completely unnecessary, so we support deleting the end of the statement:

**QUALITY OF MATERIALS** Providing quality, resilience and durability in construction ~~and execution of details.~~

The last item under Design Approaches, “Building Openings”, is unclear as stated, “Offering permeability and depth from contrasting shadow lines.” We recommend that the DC work with staff to clarify this statement for users.

Also on page 51, we discussed the phrase “masonry used at the ground level” (paragraph 1, sentence 2). While we understand the intent to use heavier materials at the ground floor, this feels somewhat limiting in the expression of design and does not necessarily meet the intent of the guideline. Not all the images used to illustrate this guideline don’t adhere to it, so we propose deleting this sentence so paragraph 1 is a single sentence:

Exterior materials can be used to reinforce the overarching design concept with thoughtful repetition or emphasis of plane shifts. Materials can also convey hierarchy. ~~Heavier materials like masonry should be used at the ground level and should express the structure of the building throughout and lighter materials can be deployed within recesses or on upper stories.~~

**Guideline 10: Design for resilience, health, and stewardship of the environment, ensuring adaptability to climate change and the evolving needs of the city.**

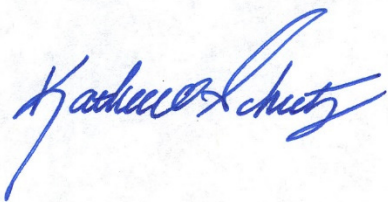
PSC members appreciate staff’s work in relaying the guidelines to the 2035 Comprehensive Plan, particularly in planning for the future of Portland in the ever-changing climate. We support this guideline and the City’s direction here.

On page 54, paragraph 4, sentence 2, we suggest “strive to” in place of “where possible” to continue pushing the efforts of building a resilient environment:

“Development should **strive to** incorporate native shrubs and trees in landscaping, create new water features, and add ecoroofs.”

Overall, the PSC is extremely pleased with new Portland Citywide Design Guidelines in the DOZA Proposed Draft. They are hugely improved from the tools we have today, and we look forward to the Design Commission’s discussion about this work.

Sincerely,



Kat Schultz  
Chair