



May 5, 2021

To the Portland City Council

**Re: Design Overlay Zone Amendments**

TVA Architects has a 37-year history working in the City of Portland. In that time we have taken numerous projects through Design Review, ranging from towers in Downtown to infill apartments on neighborhood main streets. We believe that Design Review helps shape the livable, walkable city that Portlanders cherish. The Design Overlay Zone Amendments (DOZA) will improve this process, for applicants and the public alike.

In particular, we support the following aspects of DOZA:

- **Creating new Citywide Design Guidelines.** The existing Community Design Guidelines are badly out of date and do not relate to current city goals in the Comprehensive Plan. The new Citywide Design Guidelines include nine clear, concise and well-illustrated guidelines. These new guidelines prioritize design coherency, sustainability and a vibrant public realm. The guidelines do not prescribe a particular architectural style, and instead show a range of methods by which the guidelines can be achieved.
- **Aligning the Design Standards with the Design Guidelines.** State law requires that Portland offer a clear and objective track for new housing (outside of the Central City and Gateway). Use of existing Community Design Standards often results in very poorly designed buildings, which would never be approved through Design Review. By contrast, the new Design Standards are aligned with the Design Guidelines and will result in development that better meets the goals of the Comprehensive Plan.
- **Clarifying that the Design Commission cannot reduce height and FAR.** This largely codifies the existing practice of the Design Commission, which exists to review the quality of a building's design, not to revisit decisions made by the City Council regarding the zoning on a site. Uncertainty regarding how much floor area can be built on a site can easily kill a project. Clarifying the role of the Design Commission in the code will ensure that all parties understand what is being reviewed by the Design Commission—and what is not.

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- **Changing the Design Review thresholds.** The existing thresholds are inconsistent across the city and bear little relationship to how much impact a proposal will have on the community. Under DOZA, the largest projects will go in front of the Design Commission, while smaller projects will go through a staff level review. Minor alterations to existing buildings will be reviewed by staff, or entirely exempted from review. This ensures that small projects can move forward quickly, while larger projects are subject to the appropriate level of scrutiny.

In summary, we believe that DOZA will create meaningful improvements to process that has served Portland well. We urge the City Council to pass DOZA, and we look forward to taking many projects through Design Review in the future.

Sincerely,

A handwritten signature in black ink, appearing to read 'Iain MacKenzie', written in a cursive style.

Iain MacKenzie,  
Senior Associate, TVA Architects