

The Pearl Neighbors for Integrity in Design (PNID) is an affiliation of Pearl District residents and business owners formed for the purpose of protecting and enhancing the Pearl District by promoting high-quality architectural design that is responsive and enhances livability for the current and future residents, businesses and visitors, who call the Central City their home.

PNID acknowledges that generally DOZA formalizes the design review process and expands it citywide in ways that already exist for properties subject to the design overlay within the Central City, including the Pearl District.

What DOZA does change for Central City, however, is that it formally prohibits any reduction in the floor area ratio (FAR) or height of a project, if they are otherwise allowed in the zone, as part of design review. Giving FAR and height entitled status significantly weakens the value of design review. It means that in no case will surrounding natural, historic, or cultural resource compatibility concerns or infrastructure carrying capacity limitations, such as roads or designated bicycle routes, ever restrict the height or density below what the base zone allows. This is important because Central City 2035 never took a detailed, property-specific look at resource adjacency, livability, and infrastructure capacity concerns into account.

No amount of shaping, sculpting or decorative detailing is ever going to make a 23-story building compatible with an adjacent 4-story historic district or eliminate the shadow cast over an urban open space. **Design review offers the only meaningful way to provide a site-by-site evaluation of impacts and a reduction in height or FAR is often the only way to ameliorate those impacts.** Further, any claim that such assurance of entitlement is necessary for predictability in development is specious because there is no evidence of development denial occurring because of a Design Review. **The Design Review Commission should be authorized to reduce FAR and height when the surrounding context dictates doing so.**

It is because context is so important to ensuring compatible design, PNID fully supports PDX Main Street's Design Recommendation number 4 amendment formally requiring that all design review applicants provide contextual site plan and elevations showing the proposed project within the existing built environment including when viewed from nearby resource areas such as historic district and open spaces.

A second and equally critical point is that the City's Central City Design Guidelines have not been updated since 2003, and the River District Guidelines have not updated since 2008. The City has had over 10 years of experience applying these standards and it is clear what works and what does not. Updating both of these documents was part of the promise of Central City 2035. Yet, the City has taken no action in moving forward with this effort. If the unique character and cultural contribution of Portland's Central City matters, the design guidelines must be revised to protect these features that make the downtown a place where people want to live and work. More than any other area in the City, Portland's downtown neighborhoods have suffered mightily over the past year. Please make up for this by showing your focused commitment to the downtown by asking the Bureau of Planning and Sustainability to prioritize updating the Central City and River District Guidelines. PNID stands ready to assist in this effort.