



May 12, 2021

City of Portland
Planning and Sustainability Commission
1900 SW 4th Street
Portland, OR 97201

RE: Woodstock Land Use Committee Comments on DOZA

Planning and Sustainability Commissioners/Design Commissioners:

On behalf of the Woodstock Neighborhood Association Land Use Committee, we are submitting the following comments on the DOZA Design Overlay Zoning Amendments dated November 2020, as well as those amendments related to the previous draft posted in September and February 2019. While we appreciate the effort and work product delivered by City of Portland DOZA Staffers, we would like to offer the following input for final product and process:

Key Issues we would like to address include:

Poor Public Engagement Process

As the Land Use Chair of the WNA, I first attended a DOZA Draft presentation at SE Uplift on March 18, 2019. Kathryn Hartinger led the presentation and discussion of the draft findings, which included a 'd' design overlay designation for the Woodstock Corridor/Center. Following the presentation, I provided updates to our WNA and LUC at the March 20th WNA LUC meeting and the General WNA meeting on April 1, 2019. Both the WNA and LUC were in strong support of design standards and design guidelines along the Woodstock Corridor, primarily as a tool to guide pending projects and future development in our community. I noted that the DOZA was projected for adoption in August 2020, so current and near-future projects would not be subject to design standards or guidelines.

Following the SE Uplift presentation in March, neither I nor the WNA heard anything relating to DOZA project updates or proposed changes to the proposed 'd' design overlay until early October 2019, when Heather Flint Chatto mentioned the upcoming October 22, 2019 PSC DOZA discussion and testimony. It was then that I reviewed the September 2019 DOZA draft and discovered that the 'd' overlay was removed from the Woodstock Center/Corridor. While we could have been more judicious tracking the DOZA updates, the fact that there was no notification sent to neighborhood associations regarding the updated DOZA (especially those NAs impacted by the proposed changes) is troubling and does not align with the goals of outreach and public involvement.

DOZA is needed as a tool to inform and guide development along the Woodstock Corridor

Within the last two years, 89 multi-family units have been built, with an additional 280 units coming online within the next 18 months. While the CM2 zoning does provide design standards as they relate to the building, site, and adjacent properties, DOZA as a tool to guide and inform development is badly needed. Several of the already built units have no real architectural value or context. The Joinery redevelopment project at 4804 SE

Woodstock spurred more than 200 attendees at a WNA-sponsored developer's meeting, where we collected more than 100 comments relating to building massing, the relation of the building to adjacent properties (particularly the transition to single-family residences to the east, south, and west), public amenities, and the general scale and context of the building within the Woodstock corridor.

As stated on page 46 of the DOZA Staff Report,

"Though the case for map expansion is compelling, the concept was not fully embraced by affected communities. Many were concerned about the extra time and process, even if the resulting design of any given site would likely be better. Development pressures for these areas is not high compared to areas where the design overlay zone is already mapped, so community members are not experiencing the transformation that change can sometimes bring. This proposal is proactive, but not urgent."

This statement by Staff could not be further from the truth for the Woodstock neighborhood. As the Woodstock Corridor features more streetcar era 1 and 2-story structures and vacant and/or underdeveloped parcels, development pressures are extremely high. While we understand these market pressures, the need for DOZA as a tool to guide development is critical and urgent to give a voice to the community.

And as inferred by the quote above, our affected Woodstock community was never contacted for input on the DOZA process. It is true that forums were available for commenting and input, but we were never directly contacted during this whole process. As a result, our voice was not heard and is not reflected in the DOZA recommendations.

We support SMILE May 2019 Recommendations on DOZA

SMILE conducted a thorough review and audit of the design standards. We support the recommended design standards, categories and point values; notably, the Main Street related patterns, stepbacks, storefronts and "Streetcar-era Design Bundle".

Stepbacks are a desired approach for Main Streets

A critical element of The Joinery redevelopment project that elicited great concern with the Woodstock community related to building stepbacks both at the front and at the back and side of the building as it transitioned into the neighborhood. Stepbacks are a critical design element that we would like to see emphasized.

Design Review Thresholds are too high at 65'

The level of impact for the Woodstock corridor is not adequately calibrated to the degree of dramatic scale, mass, and character change. We support Alberta Main Streets recommendation of 40' for these historic main streets.

We fully support the formalization of "Character Areas" and the work plan identified in the DOZA Staff Report on page 52

The Woodstock corridor would qualify as a "character area". Therefore, we fully support the expedited implementation of the expanded design overlay zone and "context specific" standards for the corridor. Much of the legwork to identify the character area and its elements has already been done with the Woodstock Boulevard Community Vision charrette and report, and we endorse the work conducted by PDX Main Street Initiative and their design guidelines for Division Street, Hawthorne, and Sellwood-Moreland.

Use the Main Street Design Guidelines for future main street planning work

Character and context are key aspects of current development that are supported by the neighborhood's goals and objectives of the Woodstock Charette and the adoption of the Main Street Guidelines at the October 2, 2019 Woodstock Neighborhood Association General Meeting. Thus, we support using the Main Street Design Guidelines for context sensitive guidance along the Woodstock corridor.

- In the vacuum of context/area-specific design guidelines, these guidelines fill the void for Woodstock and speak to many similar historic main streets with a common "pattern language".
- The unprecedented community-led effort behind the Main Street Design Guidelines has helped community members navigate growth and change with proactive approaches including design tools, education (planning and design terms, images and illustrations), and clarifies community design priorities which is of benefit for the DOZA work.
- The guidelines create a shared language for improved collaboration between neighborhoods, business districts, community members, developers and architects/designers

We support the narrative and the concerns below found in the Staff report on pages 51-52 related to Future Work Identified for Areas in the Low Rise Commercial Storefront Analysis:

... "project staff also acknowledge the historic and community value of the places studied in the Analysis. The identified areas comprise Portland's earliest building blocks that still define today's neighborhoods. The buildings that make up these areas are a lasting testament to the physical characteristics that design overlay zone espouses: defining context, contributing to public realm, and designing for quality and resilience through generations of merchants, residents, and visitors. They embody the image of what makes Portland, Portland."

Based on these findings, we strongly encourage that the design guidelines and standards be re-applied to the Woodstock corridor as previously shown in the February 2019 DOZA draft or that adoption of DOZA is tabled until proper outreach and input is gathered from many of these identified community centers and corridors that were left out of the design overlay designation. The Woodstock community strongly supports this endeavor, as we are facing heightened development pressure with few tools to engage the development community. We want to work in partnership with the development community but need a voice and avenue to guide our vision for the corridor.

Sincerely,



Thatch Moyle
Co-Chair, Land Use Committee
Woodstock Neighborhood Association