

PORTLAND MAIN STREETS DESIGN INITIATIVE



The Portland Main Streets Design Initiative supports communities with tools, education, and policy advocacy to advance design literacy and innovation.

Portland City Council

June 10, 2021

RE: DOZA Design Amendments

City Council Commissioners:

As a 20-year urban planner, designer and Director of the Portland Design Initiative (PDX Main Streets), I am writing to **support all eight of the proposed amendments to the Design Overlay Zones**.

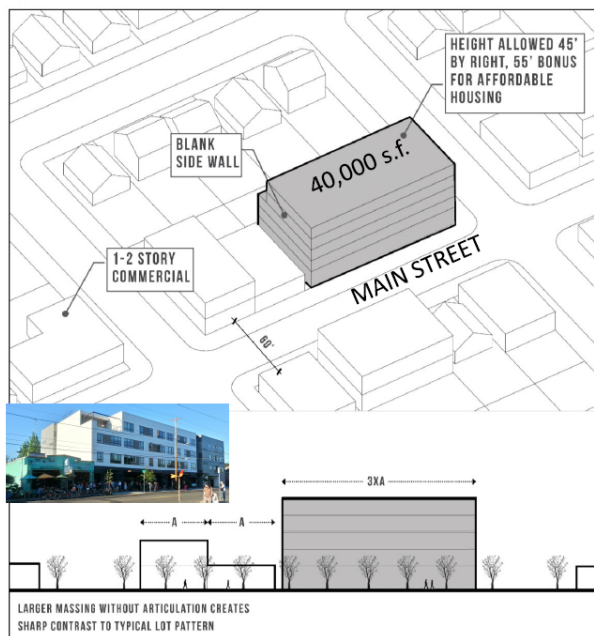
PDX Main Streets has been tracking this project with great interest since 2016, and has participated at every stage of the DOZA process.

OUR TOP RECOMMENDATIONS:

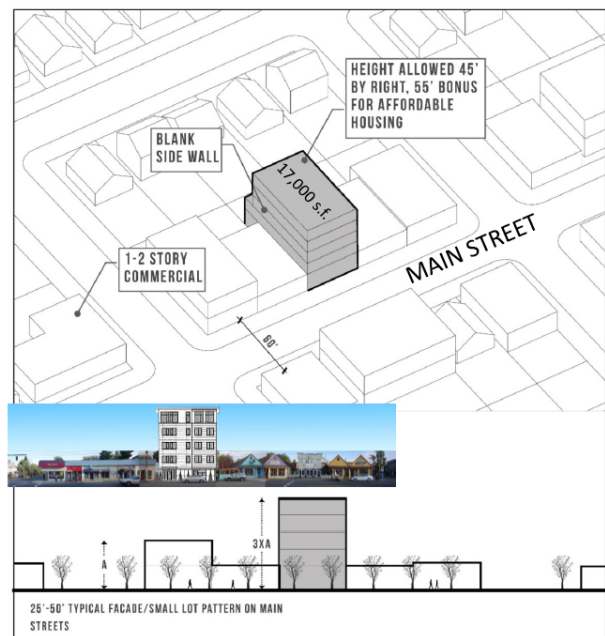
1. **Support Amendment 3 with Modification:** Support Main Street Standards Amendment with modification to apply as optional everywhere in the D-Overlay, require 4 points from this list in the M-Overlay.
2. **Support Amendment 5 with request for further study:** the Design Review recommendation for a 55' Threshold is better however please note, this still misses impacts on vintage main streets with regular 5,000 s.f. lots and big impacts creating challenging unintended consequences. (see images below) – please take the time to consider both building length (not included), and a lower square footage trigger (currently set at 80,000 s.f. is not well tuned to these places), as well as scale contrast with existing context with is still not aligned with impacts in these contexts of vintage main streets.

small lots, narrow main streets, big impacts

1/2 TO FULL BLOCK



SINGLE PARCEL



BIG IMPACTS & NO DESIGN REVIEW UNDER THE CURRENT THRESHOLDS

3. **Support Amendment 8 with Modification:** Thank you Mayor Wheeler for advocating for the “Future Work” – we strongly recommend this should include both the proposed “Character Statements” and the Vintage Areas context standards noted in the staff report on pages 51-53). You have received a great number of testifiers in the last round on the latter point and this should be included as a priority in staff budgets and workplans.
4. **Please add the PDX Main Streets Affordable Design Standard for 4 points**
5. **Add an Amendment for a BDS Context Elevation requirement:** Context is a core tenet of the DOZA Policy but this is the tool our communities have needed to better be able to evaluate context.
6. **Please extend the Timeline for comments & host a second hearing** with sufficient public notice to give verbal testimony. Less than 1 week is not meeting our equitable participation goals.

PUBLIC ENGAGEMENT & EQUITY CONCERNS ABOUT THIS POLICY

- It is overly complex for laypeople and the project has not engaged people on the east side.
- Does this fast pace turnaround on amendments meet our goals for equitable engagement?
- Have communities of color been adequately engaged on this policy? Only 1 open house on the east side?
- Have we made multi-lingual materials or easy to understand visuals available to diverse communities?
- The Standards which most projects will use, have not been adequately shared with communities, nor illustrated or explained. Only 1 open house on the east side was held.
- The Standards are labeled as “Code and Map Amendments” only presented as strike through code without illustration or description of the how the point system works.

RECOMMENDATIONS

1. **Please extend the timeline for Amendments.** Move ahead with Guidelines and process improvements but please don’t rush the Standards. A key concern is this is not enough time for equitable engagement throughout the DOZA project of those affected. For the amendments, there is not enough time to include this on a business district, neighborhood association or coalition meeting agenda for general public to be involved.
2. **A multi-lingual poster at local libraries, churches, High Schools, Community Centers**, etc saying, “The City is changing building design standards and guidelines for buildings – what’s important to you?” with a survey form or handout with links to learn more. This could grab community members attention more than complex code documents most have little time to read.
3. **Host a Town Hall/listening sessions/design tour** to hear about local design priorities and concerns.
4. **Use a Visual Preference Survey that can also help cross language barriers and** to validate this is the direction for the City we want. Most communities have strong feelings about design but the way this policy is presented is so complex that it does not engender participation. Make it easy for all communities to weigh in, not just special interests. Architects have been a primary commenters, however studies show they typically have very divergent views than the public on design.

Adopt the Guidelines but please don’t rush the Standards, these will have long term impacts and have not been well vetted, translated, or communicated to the community in any form.

We need Internal accountability aligned with our goals on equity on both public involvement, engagement, and meaningful participation both on the policy and the process and impact on the ground.

ABOUT PDX MAIN STREETS

Our focus is on supporting communities with a public processes to help to create their own vision, to document their goals after widespread engagement and data gathering, to develop priorities based on this data that can help new buildings and those working on this have clarity about the people and place. We work to ensuring communities and decisionmakers really understand the on-the ground impacts of decisions, and the perspectives of communities who are challenged to participate in complex policies that are often not made understandable to the public, nor who have the time to wade through highly technical documents but care deeply about design issues. We believe DOZA, while very good, has missed the mark on public engagement both during the process of development and continuing to do so as evidenced by only a week of time before testimony, and even less to register to participate online at the hearing.

We very much support the DOZA project and the good work of staff, and offer these recommendations in the spirit of helping our City empower all citizens with access to good tools to impact the decisions that effect them through education, information sharing, creative involvement, data gathering and proactive tools that can document priorities for design to make it easier for development to happen with less conflict and greater speed because these are clearly articulated. We started on Division as major redevelopment was happening, and worked hard to engage communities without an expectation on the outcome. What resulted were design guidelines, reviewed, vetted, refined, and adopted by all four neighborhoods and the business association. Then other neighborhoods adopted these because they also felt the direction of development did not match their goals and lacked tools. At each junction we educated communities, gave public notice, took comments, and went through formal adoptions at the local level. The resulting PDX Main Streets Design Guidelines has now been adopted for 12 main streets by 9 neighborhood and business associations.

Without good tools like character statement and design standards that are context sensitive, communities lack the process and participation in both identifying their current context, but also in establishing goals for their future desired context. Division did not have that chance. The initial development transformation on Division It was made by a few developers each with 3 projects with a significant long-term impacts. The City lacked the resources or desire to respond. This burdens communities which do not have the resources to respond during major redevelopment.

At that time DOZA began we were working with the Division Design Community which was significantly impacted by major redevelopment yet had no meaningful voice in the process. We participated in the Mixed-Use Zoning Process, Comp Plan, Residential Infill, Neighborhood Contact Code Update, Historic Resources Code Update and DOZA Design Standards and Guidelines, because each of these had design elements and engagement aspects that we as volunteer design educators, and policy-watch dogs, wanted to ensure communities could understand and be more equitably involved in.

We leveraged many neighborhoods, a small grant from SE Uplift and thousands of hours of volunteer time to work collaboratively across boundaries to create design goals, priorities, recommendations, surveying the public in many ways that would reach beyond meetings to where people shopped, took the bus, received medical care at OHSU, recreated at food carts, etc. We vetted recommendations over and over with communities with great success. The minor except was a small group of some rather harsh naysayers that have chosen to attack our integrity under the banner of Portland Neighbors Welcome. We don't mind disagreeing on the issues, but personal attacks, and false narratives with shaming labels hurt everyone and further create divides where we may actually agree more than we disagree. If we are to come together as a City, we need a return to compassion to real active listening and to understand the real impacts that communities are struggling with.

DISPELLING MYTHS

FALSE: There is a narrative being perpetuated that concerns about design are a form of NIMBYism or some stealth approach to stop change or block density, or to make buildings look old, or limit style or

preserve things in amber. NONE OF THESE ARE TRUE. This is divisive and lacks understanding of what design is and what it does functionally, qualitatively, environmentally, economically, socially, and psychologically. See chart below that validates this is not about density but a key issue of design.

TRUTH: The development politics that have surrounded both Division and this policy are stranger than fiction. Main street patterns work in any style, and are responsive to human-scale design that helps taller buildings feel more human, relatable, and less oppressive through design.

LANGUAGE MATTERS: We can come together around common values without harmful attacks when we attach the problem, not the people. NIMBY language is a form of hate-shaming speech and should not be tolerated from leaders, organizations, nor City staff. It stops real conversation, openness to hearing diverse values and perspective to find common goals. We call for greater compassion for communities struggling with change that lack the language to ask for what they want, nor the time and understanding to participate in an overly complex policy that is barely understood by most staff and decisionmakers. There is clearly a lack of understanding of the nuances of design that is being conflated with style. Design approaches encouraged through the main street design standards are functionally more relevant to how people use buildings and how the buildings impact both the public sphere, their health and well-being. When we speak about design it is more related to built form, massing, scale, pattern, materials, operations, energy efficiency, durability and maintenance and cost efficiency.

The data from our Division Perception Survey in the Appendix developed by PSU was analyzed by Joy Davis from Design Culture Lab clearly shows the concerns were significant related to architectural design NOT density. In fact, density this was rarely raised, and if it was it was slightly more positive than negative, whereas the affordability was a deep concern, and the architecture was overwhelmingly deemed negatively perceived. When the City describes Division, they point to the commercial vitality, but ignores the full story.

We work to be a bridge, to look deeper, to get the data, to create proactive and positive processes with communities. We look forward to working in more parts where there are less architects and planners. As an example of our work, this weekend we are helping provide pro-bono services to a church on 82nd that wants to do affordable housing, to help them with a community design charrette. On July 15th, we're hosting a design walk on Alberta at the request of the Concordia Neighborhood Association to study their design patterns and discuss goals and concerns. This is who we are and what we do. This is how we work to empower communities with support services, design literacy and tools.

We hope that we can collaborate more with the City to share our on-the ground knowledge from years of boots on the ground engagement, our creative strategies that make complex issues easier for communities to engage meaningfully because everyone deserves good design and a voice in shaping their community.

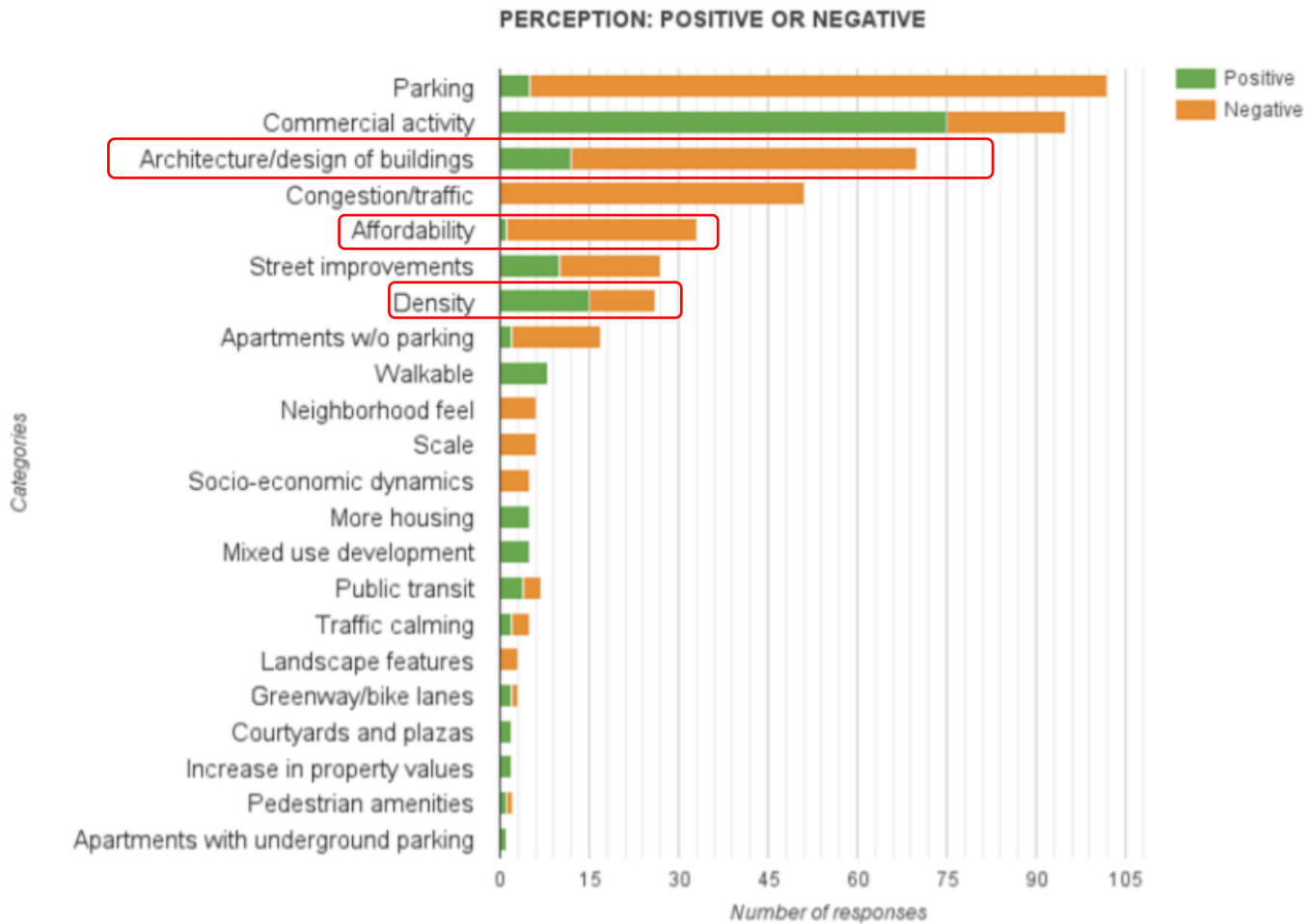
Please see the attached Appendix for more background and many thanks to Staff and Commissioners for their good work and this project. We ask that you extend the deadline for comments and please give it the time it deserves to refine and equitably engage the community on these very impactful policies.

Much gratitude

Heather Flint Chatto, Urban Planner & Designer

Director, PDX Main Streets Design Initiative

APPENDIX



Comprehensive Plan Policies: that support Amendment 3

Our proposal supports compliance with Comp Plan policies 3.41, 4.27, and 4.48 and will make better market rate buildings.

Inner Ring Neighborhoods "...future growth should be integrated within the existing and historic fabric."

- **Policy 3.87 Inner Neighborhood Main Streets.** Maintain and enhance the streetcar era pattern...
- **Policy 3.89. Inner Neighborhood Infill.** Fill gaps in the urban fabric through infill development on vacant and underutilized sites and in the reuse of historic buildings on adopted inventories.

Inner Ring Districts

- **Policy 3.41 Distinct Identities.** Maintain and enhance the distinct identities of the Inner Ring Districts and their corridors. Use and expand existing historic preservation and design review tools to accommodate growth in ways that identify and preserve historic resources and enhance the distinctive characteristics of the Inner Ring Districts, especially in areas experiencing significant development.

Design & Development of Centers & Corridors

- **Policy 4.27 Protect Defining Features.** Protect and enhance defining places and features of centers and corridors, including landmarks, natural features, and historic and cultural resources, through application of zoning, incentive programs, and regulatory tools. *(Referenced on page 1 LR Commercial Storefront Analysis)*

Historic & Cultural Resources

- **Policy 4.48 Continuity with established patterns.** Encourage development that fills in vacant and underutilized gaps within the established urban fabric, while preserving and complementing historic resources. *(new main street development is in contrast with established urban fabric, and (undesigned) historic resources).*
-

