

Richmond Neighborhood Association

c/o Southeast Uplift 3534 SE Main
Portland, OR 97214
Phone: 503/232-0010



<http://richmondpx.org/>

May 12, 2021

Portland City Council
1900 SW 4th St.
Portland, OR

RE: Richmond Neighborhood Association Comments on DOZA

City Council Members:

On May 10, 2021, the Richmond Neighborhood Association Board voted unanimously to submit the following comments on the DOZA Design Overlay Zoning Amendments. We have been tracking this project with support from the PDX Main Streets Design Initiative and the Richmond Land Use and Transportation Committee since inception with great interest and regular advocacy.

[We support the PDX Main Streets Top 5 Policy Recommendations](#)

Key Issues we would like to address include:

1. **Poor Public Input & Engagement Process** Insufficient outreach and education has been made for the E. Side of Portland and in general for this timeframe and complexity of this project. Additionally, we have concerns over the omission of 33 Richmond/Hawthorne public comments on the DOZA draft that were not counted nor reflected in the total summary of the comments (only 97 comments received, thus this is 25%) and we are further concerned this content was not conveyed to decisionmakers.
2. **Undesignated Historic Districts are at Risk** – The City needs a subset of Main Street Standards in the new Citywide Design Standards - DOZA should address these as a priority in budget and work plans for the areas in the Vintage Main Streets Centers Study (aka the Low Rise Commercial Storefront Analysis).
3. **Support SMILE May 2019 Recommendations on DOZA** – Support the recommended design standards categories and point values generally, notably, the Main Street related patterns, stepbacks, storefronts and Streetcar-era Design Bundle”.
4. **Division Plan District** – Add a reference to the adopted PDX Main St. Guidelines and work with our community to integrate a list of priority Main Street Standards from our Guidelines.
5. **Add a Hawthorne Plan District** with a reference to the adopted PDX Main Street Guidelines and a list of priority Main Street Standards.
6. **Citywide Design Guidelines** – good narrative but design standards need more context-sensitivity
7. **Stepbacks are a desired approach for Main Streets** widely supported in the 150 public surveys and testimony submitted to the PSC in 2019
8. **E. Side Design Commission** - We support forming an additional Design Commission as recommended by the DOZA Consultants Walker Macy in 2016 and in the 2019 Housing Affordability Memo. (DOZA Process Recommendation 8)

9. **Design Assistance Review (DAR) Process** – When referring to character and context and “Community Guided Sources,” we encourage staff to create add list of recognized community sources (e.g. locally adopted design guidelines, community plans, etc.) and refer design applicants to this approved list with a protocol for alerting BDS and BPS staff to the guidelines for applicants as noted in HBBA’s letter of support for the main street guidelines.
10. **Context is not sufficiently addressed in the DOZA proposals.** Add a context elevation requirement for permit submittals, creating context maps that describe area patterns, and a design standard that evaluates points for contextual designs.
11. **Design Review Thresholds are too high at 65’-75’ for undesignated historic main streets** – level of impact is not adequately calibrated to the degree of dramatic scale, mass, and character change. We support Alberta Main Streets and HBBA’s recommendation of 40’ for these Vintage Areas
12. **Support city use of the PDX Main Street Design Guidelines as a reference for future work identified in the DOZA Staff Report on pages 51-53** for responding to the [Low-Rise Commercial Storefront Analysis \(Vintage Areas Study\)](#) areas that are at risk. Use the PDX Main Streets Guidelines **extensive research already completed that identifies common main street design patterns across the city, and has had broad public outreach and significant vetting by the public, and is now adopted for 12 main streets.**

MORE PUBLIC PROCESS IS NEEDED

The following quote is an excellent narrative in the City Staff report and a lovely aspirational goal. However, it is also a shining example of the poor public process that both this project and recent development and planning have exhibited by not including affected communities in shaping both process and policy as well as significant redevelopment.

We encourage you to do a simple visual preference survey to engage the public and the broader community in a more direct manner that lowers barriers to participation and more fairly engages the east side in a representative way.

EQUITY: “How community responds to new development often reflects how included they feel in the development process, as well as how intentionally populations that are under-served and underrepresented were engaged in the decisions that affect them. Clarifying the design review process for the public, in conjunction with new neighborhood contact requirements that bring more design-related meetings into the community, lowers barriers for civic engagement.” (DOZA September 2019 Staff Report)

TRACK DEVELOPMENT IMPACTS

Over the past several years, our neighborhood has experienced significant growth and change, including the major redevelopment of Division Street. While the added density has brought increased visitors, street vitality and needed housing, there is a host of unintended consequences including increased gentrification, displacement, loss of affordable housing and significant district character change. These impacts need to be tracked and evaluated so that we can better assess gains, and losses to our long-term sustainability goals. **We encourage you to work with the PDX Main Streets to further develop a Sustainability Scorecard that can better track impacts and help evaluate policies and projects to measure progress toward our shared community goals.**

USE THE MAIN STREET GUIDELINES FOR FUTURE MAIN STREET PLANNING

Character and context are key aspects of current development in direct conflict with stated goals of the Richmond Neighborhood Plan, the city adopted Division Green Street Main Streets Plan from 2006 and the Division Design Guidelines adopted in 2018 by the Richmond Neighborhood Association. We have readopted these as the PDX Main Streets Design Guidelines in 2020 for application for both Division and Hawthorne. Thus, we support using our design guidelines for context sensitive guidance in Vintage Areas because:

- In the vacuum of context/area-specific design guidelines, these guidelines fill the void for not just Division but speak to many similar historic main streets with a common “pattern language”.
- This unprecedented community-led effort 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 52-53 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.***

*These areas are indeed well-positioned for growth with access to services, shopping, and transit. **Without demolition protection, the blocks that comprise these early buildings and their immediate surrounding blocks are in danger of being fully redeveloped without a nod to their character-giving features. Absent the development of Historic or Conservation Districts within these areas (which would require owner consent due to State law), these blocks – because most are within the d overlay – could rely on specific guidance for development and redevelopment within the d-overlay tools, which would continue to build on this valued character.”***

We strongly encourage this district main street work be done now and that you value the leadership work we have done to create the Main Street Guidelines that have now been adopted for by neighborhood and business associations for seven main streets in Portland.

Sincerely,

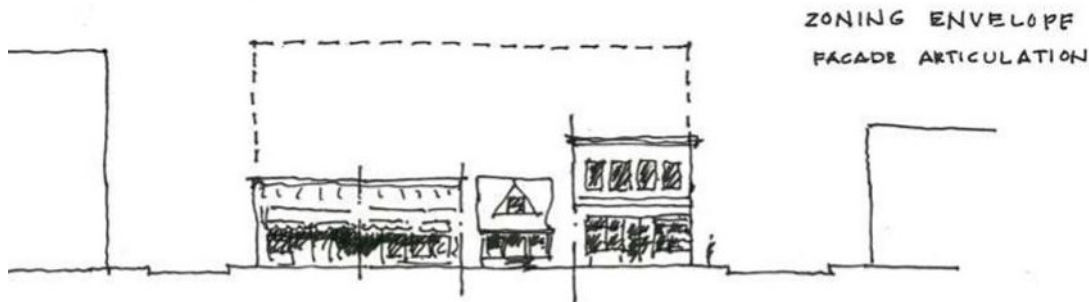


Debby Hochhalter, Chair, Richmond Neighborhood Association

cc: RNA Board

Attachments:

- PDX Main Streets Design Guidelines
- Hawthorne Special Buildings List
- Photos illustrating dramatic change in character and context within Richmond.

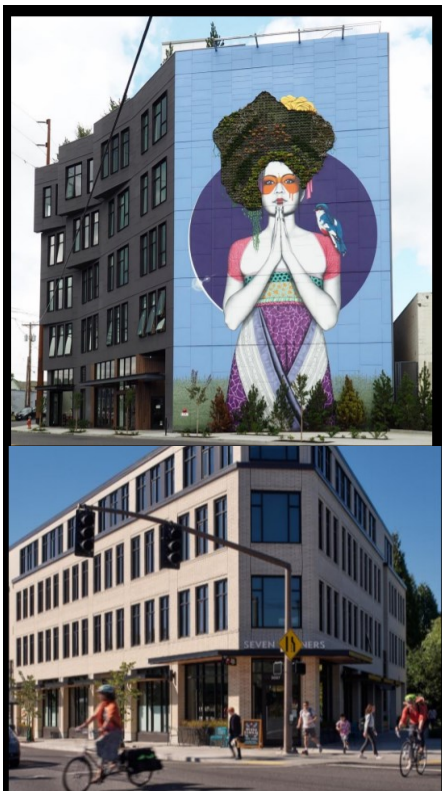


The Context Challenge: Transitions in Scale & Compatibility vs. Larger Zoning Envelope Potential

Source: Mixed Use Zoning Committee Presentation <https://www.portlandoregon.gov/bps/article/494316>

Below Left: Good fit density at 9th and 20th on Division that relate to the main street patterns

Below Right: redevelopment at 32-34th on Division is more than infill evolving the context, but an entirely new context that is not in alignment with the Division Main Street Plans or Guidelines





Above: The distinctive main street storefronts of Hawthorne and Division with varied styles yet common main street patterns not well represented in newer development.

Middle left: New development on Hawthorne Boulevard, creates with a sharp contrast with the existing character, form and mass and pattern of the District. large blank walls and overwhelms the smaller main street buildings, including the very vibrant and active Por Que No restaurant adjacent.

Middle right: A new Hawthorne building that fits compatibly with the existing context.

Below: three new buildings (among eight) built all at the same time on Division with significant compatibility & character contrasts to stated community plan goals in the adopted Division Green Street/Main Street Plan.

