

Portland Planning and Sustainability Commission
DOZA Discussion Draft Testimony
1900 SW 4th Ave, Suite 7100
Portland, OR 97201



The following public comment is submitted on behalf of the Arbor Lodge Neighborhood Association (ALNA), the Overlook Neighborhood Association Chair and the Kenton Neighborhood Association. Together these three neighborhoods envelope the North Interstate Planning District (NIPD). We appreciate the opportunity to provide input on the discussion draft of the DOZA and to raise awareness on development patterns within the North Interstate Planning District, all of which is presently within the design overlay.

Arbor Lodge, Overlook and Kenton currently are under immense development pressure, absorbing new density without supportive code provisions that would require much needed services and community gathering spots. Our communities support infill that provides quality housing opportunities for a diversity of household types and, most importantly, activates our key neighborhood centers to facilitate a walkable, cohesive neighborhood. We reviewed the discussion draft with a focus towards three priorities:

- 1) Retain and increase commercial spaces on lots whose zoning enables, but does not currently require, these uses;
- 2) Expand the d-overlay to encompass Arbor Lodge's and Overlook's neighborhood centers;
- 3) Increase opportunities for public participation and engagement through the design review process.

Volume I, Staff Report, emphasizes the importance of DOZA stating, **"With attention to design, this change will result in great places in which people live, work, gather and recreate—rather than just clusters of dense development."**

Our neighborhoods have experienced a loss of places to gather, work or recreate through redevelopment of sites within, and outside, the d-overlay zone. These sites have not provided space for commercial uses. Examples include the replacement of the Interstate Bowling Lanes at 6049 N Interstate Ave with the "Arlo Apartments," the proposed "Arbor Lodge Apartments" at 6545 N Denver, and the Aniva Apartments at 5009 N Interstate. These projects are sited in key commercial corridors, and all three have excluded commercial uses despite strong community appeals. Further, only some of the buildings on Interstate have mixed use, contrary to the stated goals of the Interstate Urban Renewal Area. This has created islands of commercial activity,

rather than a continuous, vibrant stretch of business. The zoning within the NIPD is producing significant density. However without supporting commercial and community spaces, it is leading to an “urban canyon” effect rather than livable, walkable neighborhoods. This harms all residents—homeowners, renters, those in affordable housing including our current neighbors and those yet to arrive.

Given this alarming trend, the Arbor Lodge Neighborhood Association, Overlook Neighborhood Association Chair and Kenton Neighborhood Association strongly recommend the following:

1. Apply the entirety of the Centers Main Street Overlay Zone (33.415) to the any site located within the D Overlay Zone. We recommend incorporation of the “M-Overlay” as a mandatory element of the revised design standards. This will serve to create greater consistency for the development community, and will further the goals stated in DOZA and of the Portland Climate Action Plan. Simply put, we cannot create walkable communities where there is nothing to walk to.
2. State more clearly and directly in the design goals that seamless incorporation of active uses on the ground floor such as commercial and outward-facing businesses are an essential element of good design. This emphasis would encourage livable, walkable corridors that serve new and existing residents alike. If the M-Overlay is extended throughout the D-Overlay as suggested above, this goal partially will be met by the M-Overlay requirement of at least 25 percent ground floor space to be active use, but that minimum is useful only if enforced by staff and the land use review process. If the M-Overlay is not extended, a similar requirement should be added to the D-Overlay.
3. Expand the boundary of the D-Overlay to include the entire intersection of N Denver and N Rosa Parks Way. The present boundary stops midway on Rosa Parks to the east side of this vital intersection, which is the small commercial center of Arbor Lodge, our “downtown.” The intersection is a central gathering place in the community for living, working, and recreating. Therefore, it does not make sense to have only part of Rosa Parks leading into the intersection be part of the D-Overlay.
4. Extend the boundary of the D-Overlay to include the length of N Killingsworth Street to the west side of the N Greeley Avenue intersection. The present boundary ends on the east side of the N Denver Avenue intersection. Killingsworth between Interstate and Greeley is a current and historic central gathering place in the community for living, working, and recreating. Killingsworth also is an important transit route served by Trimet. The commercial activity extends the entire length of the street and has seen a considerable amount of infill and replacement development in recent years. Application of the D-Overlay would ensure that future projects in the area meet design goals and integrate well with the surrounding commercial and residential uses.

5. Section 33.420.050 proposes a doubling of the maximum square footage where design standards may be utilized for the projects that are solely non-residential uses. We strongly object to this change, and recommend it remain at the current 20,000 square foot maximum. Community members should have an opportunity to participate and have their voice heard, and the city should recognize that the impact of a new project very much depends on the context of its surroundings.
6. The DOZA project should impose some reasonable limit on the use of design standards for all projects, inclusive of projects that contain residential units. The City Of Portland's application of ORS 197.307 assumes an overly generous interpretation of "needed housing," and is missing an opportunity to enfranchise communities that are advocating for family-accommodating multiple bedroom dwelling units to be included in new development. Our recommendation is that any project not providing 2+ bedroom affordable housing units does not meet the threshold of providing "needed housing" and should be subject to the same 20,000 square foot design standard threshold as a non-residential site. If the city will not subject impactful residential and mixed use projects to design review, it directly encourages developers who seek to profit off the name and character of communities whose input can be readily discarded by utilizing design standards.
7. Finally, we would like to highlight the proposed code amendment at 33.710.050.B.3. It would require one member of the Design Commission be a member of the public-at-large who is not employed in the development industry (as defined in that code section). This is an important change that we urge you not to remove. The commission needs members with subject expertise, but when that is the sole lens through which design questions are reviewed, there sometimes is a sense that group-think has set in. Moreover, commissioners from the industry often have professional or personal relationships with other members of the development community raising questions about the impartiality of review. Other perspectives are important and giving them a real voice would benefit design deliberations. Indeed, we suggest that the number of public-at-large commission members be increased to two of the seven commission members, not just one. Smart Portlanders willing to do the work could tremendously improve the commission's effectiveness, work and credibility.

Thank you for considering our input, we look forward to continued participation and dialog.

Regards,



Christian J. Trejbal, Chair
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