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May 13, 2021

Portland City Council
1221 SW 4th Ave Room 130
Portland, OR 97204

RE: Design Overlay Zoning Amendment

Dear Mayor Wheeler, Commissioners Hardesty, Mapps, Rubio, and Ryan:

Thank you for the opportunity to comment on the proposed draft Design Overlay Zoning Amendments (DOZA). The Urban Greenspaces Institute works across the Portland-Vancouver metropolitan region to integrate greenspaces with the built environment. We engage with agencies, nonprofits, and the public on collaborative conservation initiatives and how to best leverage limited public and private resources to achieve wildlife habitat connectivity, clean water, and access to nature.

The DOZA represents an important opportunity to more thoughtfully integrate nature into the built environment across the City's diverse commercial centers and corridors. We appreciate the fine work completed by the Bureau of Planning and Sustainability, Planning and Sustainability Commission and Design Commission on this project. We are very pleased to see that many of our recommendations on the previous drafts have been incorporated into the version before you today.

There is urgency to this work, as the effects of climate change are beginning to manifest in our community. In the past, the design review process has focused more on building appearance or massing, and neglected climate change mitigation and adaptation. Design review has sometimes contributed to community displacement or been used to exclude or make difficult the construction of affordable housing developments in commercial corridors.

We need to transform the design review process to make Portland more equitable, with better access to affordable housing, and better prepared for the climate crisis that is upon us. The recommended DOZA reforms are a step in the right direction. Below we highlight few key features from DOZA that we very much support.

Greater emphasis on green infrastructure.— We appreciate the City's efforts to standardize and streamline the design review process, and we like that the newest draft incorporates greater consideration and integration of green infrastructure features like trees, ecoroofs, native landscaping, pervious paving, bird-safe window glazing, Willamette Greenway context standards, and outdoor common areas. Previous DOZA drafts awarded fewer points for green infrastructure and emphasized architectural and aesthetic building design elements with less consideration for green infrastructure. This is an important step forward!

Although we have seen progress on the design standards from previous DOZA drafts, we encourage the City go farther and consider requiring or adding additional incentives for

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ecoroofs, green walls, and open space for medium- and large-form trees. Since many of the City's commercial districts lack sufficient space for trees, the DOZA represents our best chance to incentivize urban green features that mitigate for heat island impacts stemming from high-density development.

A few years back the City moved to require ecoroofs in the Central City. Ecoroofs provide multiple environmental and community benefits. Ecoroofs decrease stormwater runoff, save energy, absorb carbon dioxide, cool urban heat islands, filter air pollutants, prolong the lifecycle of buildings and reduce landfill waste, create habitat for birds and insects, and provide access to rooftop greenspaces for urban dwellers. Ecoroofs do not conflict but are complementary to roof-top solar arrays. Some DOZA commenters claim ecoroofs do not contribute to the public realm, but this reflects a misunderstanding of their role to cool our City during heat waves and attenuate stormwater runoff. Please consider offering higher design standard points for ecoroofs, and/or make ecoroofs required on large buildings >20,000 sf.

Easing the design review burden for new affordable housing development – We appreciate the City's efforts to streamline the design review process and make it less burdensome on developers of affordable housing. In particular, we strongly support the amendment to disallow reductions in Floor Area Ratio (FAR) during the design review process. We encourage you to consider other suggestions by various advocates for affordable housing on additional measures that could be taken to make DOZA even more friendly towards developers of accessible, inclusive and affordable homes in commercial districts of Portland.

Expanded Design Commission membership eligibility – We applaud the City for expanding the Design Commission membership eligibility for landscape architects and to reserve seats for those with expertise in natural resources and sustainable building. Given the City's new goals around preparing for climate change, there is an urgent need for expanded skill sets on the Design Commission.

Thank you for the opportunity to comment. We appreciate the opportunity to participate and help shape the code and make the City more verdant, resilient, and equitable for all.

Thank you.

Sincerely,



Ted Labbe

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