

DETAILED DOZA PROJECT RECOMMENDATIONS

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The Design overlay Zoning Assessment (DOZA) Project Interim Assessment Report prepared by outside consultant Mark Hinshaw and team is excellent and outlines many recommendations that align with neighborhood priorities expressed in community testimony by the Division Design Initiative (DDI). Further, DDI has also articulated and made further detailed recommendations for many of these issues that should be considered as the DOZA recommendations are considered and implemented.

The following represent initial recommendations based on work related to the Division Design Initiative, a three-year inter-neighborhood collaborative of seven organizations working to respond to and create design recommendations and tools to address design concerns in the rapid redevelopment of inner SE Portland.

1. **Strong Support for Three Key Design Tenets – “Response to Context, Public Realm and Quality and sense of Permanence”.** Especially relating to Scale, Patterns and Identity (see Interim Report pages 4-5). Strongly agree with the recommendations to focus on response to context. Support the good language in the Recommendations Report pages 31-32 for consideration of context, and on pages 25-26 related to livability, privacy. Also support the Quality and Permanence focus especially related to quality materials, and the citation of a focus on sustainability energy use and ability to adapt over time.
2. **Support for Notification Recommendations** – (Recommendation Report: A5, A6)
 - a. **Support the onsite poster signage recommendation** with proposed site plan as done in Seattle.
 - b. **Support Expanded Notification** - This aligns with the DDI Top 10 Policy #1. 400' was suggested in the consultant recommendations. 500' is recommended by DDI in our Notification Policy linked below.
 - c. **Support for Integrating a neighborhood input process into permit process AND context analysis evaluation.** (Recommendations Report A6 “Require applicants to document response to neighborhood input” and B3 Guiding Tenets for standards & guidelines “a) Respond to context”. The DDI has developed a good model policy for both notification and context evaluation and follow up process for community input that was endorsed by many neighborhood associations. Neighborhoods that have endorsed this Notification & Community Engagement policy include: Division Clinton Business Association, Hawthorne Boulevard Business Association, Richmond NA, Hosford Abernethy ND, Laurelhurst NA, Mt Tabor NA, S. Tabor NA, and SE Uplift board). Additionally, the Richmond Neighborhood Association has formally adopted these as their policy and other neighborhoods are in process to do the same. View the policy online here: <https://divisiondesigninitiative.files.wordpress.com/2014/08/notification-community-engagement-recommendation-5-11-15.pdf>
4. **Support for Context-Based “Pattern Area” Design Guidelines including Areas of Special Character** (noted in Interim Report) Very importantly we need guidelines for Street Car-Era Main Streets. When HBBA adopted our Division guidelines for Hawthorne their vote also gave support for these becoming SE Main Street guidelines and Sellwood and others seem similarly interested in something for these older streetcar era main streets.
5. **Support for Context Analysis** (See Recommendation Report: Tools: #3a, and Interim Report Pages 4-5)
6. **Support for forming a Second Design Commission as a Top Priority to Implement Now** (Recommendations A8, pg. 20) This is essential to reduce the bottleneck of projects and given the extensive volume of development in East Portland. For example there are at least eight properties in process or recently sold which are about to redevelop on SE Division alone now. We cannot wait. Some have advocated for one per quadrant but at a minimum we need at least one now. This could be disbanded if development slows but is critical to better contextual design.
7. **Support for a neighborhood representative specific to the development location as a contributor at meetings** during design commission consideration of a major project.
8. **Support for adjustments to process that will better support small AND dense infill development** in older areas vs block long developments that so drastically change the character of a place. These big projects are good in some places but as the Initial Assessment Report notes our current process favors the big megaprojects over the small developer on a single infill lot.

9. **Support for Impact Analysis** (Recommendation A. PROCESS, #7a "Document where these changes are occurring what the impacts are": – DDI has suggested a "Sustainability Scorecard" per project that could document both positive and negative impacts (e.g. gain in housing capacity, loss of historic building, gain in pedestrian amenities, and solar shading impacts to adjacent buildings). This is not an Environmental Review, but would provide a better assessment for planners and the community of the real context impacts and help staff track and manage both local and regional impacts.
10. **Support for Context-Sensitive focus to the Design Guidelines** (Recommendations Report B1 and B3. We need definitions of context and quality embedded and teeth added to the standards and guidelines. "Respect for Context and "relate to context" or "respect neighborhood character" are embedded throughout our Comp Plan goals and guidelines but are missing the real methods for evaluation and teeth. Note that the Hearings Examiner on the Brentwood Darlington appeal had to go to Webster's Dictionary to define context - this is a big issue. The Division Design Guidelines process has done some key work on this and has defined many of the measures and tools for evaluation of this which should be drawn on more for permit submittals and standards/guidelines.
11. **Cautious Support for Recrafting the Design Guidelines "Recognizing the Changing Nature of the City"** – (Recommendation D1) – Strongly recommend drawing on resources listed pages 31-32 for the consideration of "evolving context", especially drawing upon "Character-giving" places in the heart of Portland's corridors as mapped in the Mixed Use Zoning project." Focus the context on the pre-2012 context first to maintain neighborhood identity that is rapidly eroding. Then integrate and consider new development and cumulative projects to better evaluate transitional measures. There has been too much novelty for novelty sake which detracts from cohesion of a district.

WHAT'S MISSING (short list):

1. **Cumulative Development Impact Assessment as Part of Context Analysis.** This should be adding to the Context Analysis evaluation more consideration of the comprehensive look when multiple proposed projects are pending in an area (which should've happened on Division in the last wave of 8-12 big projects) and which is needed for another upcoming eight anticipated developments on Division in progress or soon to develop (based on recent property sales) that we know of now. This could include a trigger for bigger neighborhood meeting (maybe with city staff) or simply more consideration of the cumulative issues and impact.
2. **Stronger emphasis on Green Features is needed for Incentives & Evaluation** – climate impacts and heat island impacts need better integration into design review and well as incentives for zero energy buildings, and green features - use Seattle & Germany's "Green Factor" review process as a model. Santa Monica just passed the first ZNE Reach Code in the Country, and requires solar on all new commercial development. Others are following suit on zero energy buildings across the country and local governments across California has a goal for all new buildings to be net zero by 2030 and local governments across the country are developing their plans and programs to integrate zero energy incentives. Portland is lagging on this front and needs to step up its leadership to maintain our legacy of innovation.
3. **Existing Buildings Need Programmatic Incentives** – Portland has a rich fabric of existing buildings and the recommendations should include more programmatic efforts for incentivizing adapting and adding stories to these buildings both for reduced climate impacts of the embodied energy in buildings (see PGL study on The Greenest Building: Quantifying the Impacts of Environmental Building Reuse, citation of significant CO2 impacts related to County Climate Goals). Fee waivers, fast track permitting and programs to assist property owners are needed (Santa Barbara County has a model for this via the former Mixed Use Assistance Program which helped provide property owners with architectural feasibility studies and sample plans for adding 1-2 stories above existing buildings. Heather Flint Chatto ran the program and can offer more detail).
4. **Add to & Operationalize Existing Portland Infill Design Toolkit** – This is an excellent document and needs two efforts to help foster better design. 1) Add the missing Mixed Use Multifamily section and 2) add operational integration into programmatic efforts. This should be a priority in work programs

See the following pages for key concerns.

OTHER CONCERNS

1. **Height Limits/Thresholds Triggering Design Review Outside Central City Need Adjustments to address more of current and recent development scale** (Recommendations Report A1, p.4)
 - Unclear for the laypeople the components of what a Type II and Type III review is, the difference in content reviewed, degree of scrutiny of design review that will be included in each, and who will be conducting them – (staff only for Type II reviews?) This is a concern as many staff are not well trained on design issues nor are as familiar with context, community goals and priorities.
 - **Review Thresholds/heights are too high for neighborhood scale projects** – 55' is too tall for a trigger (even on small sites of 5,000). Given the smaller existing scale fabric of the traditionally one and two story (35' high typically) neighborhoods, these structures stick out like sore thumb and need heightened level of design review.
 - **Recommendation** - Threshold for "Small New Construction" should be Design Review for any buildings above 35' high. Buildings recently built at 45' have been very impactful to inner Eastside communities and still would not have the review the community has asked for. If Recommendation A8 for an additional Design Commission were implemented now this would provide the necessary review body to address this demand.
2. **Ethical Concerns & Truing up the Current Development Course** – There is a widely shared perception that neighborhood issues and concerns along with some of the staff's early recommendations have been largely ignored or overridden in the recent Mixed Use Zones (MUZ) process. Community advisory bodies, convened to shape the MUZ as well as other recent planning projects, were seen as heavily weighted with representation from developers and others beholden to them, some with undisclosed conflicts of interest. Community livability issues and impacts have been ignored and a great deal of political capital and faith in local government has been lost.
3. **Support for Revising some MUZ Issues and Standards Related to Livability, Sustainability & Resiliency:**
 - a. The Floor Area Ratios (FAR) needs to be revisited and reduced for narrow corridors and smaller streetcar era main streets, to better shape the massing of buildings for appropriate contextual responses. Current regulations have resulted in monocultures of out of scale and out of context overly flat, bulky, boxy buildings with large blank walls that overshadow existing nearby and adjacent buildings causing significant neighborhood impacts. Further, this has also led to an overconcentration of windows at the rear causing light overspill and privacy impacts and reducing property values. This also limits the ability for air and light in the new building and creates less livable and resilient buildings in the long term. *(Adjusting the FAR to better shape the massing was a key issue discussed by commissioners at the joint meeting of the PSC and Design Commission on 2.9.17)*
 - b. Revisiting upper level 4th Floor Stepbacks on narrow corridors. This strongly desired building design treatment and approach to help better relate to smaller development context of older narrow main streets was early-on recommended by staff and consistently throughout the MUZ project. It is also in the Division Design Guidelines. However, this important issue was rejected due to cost concerns. However, this issue should be revisited for better acceptance of taller buildings perhaps using creative approaches such as mansard roofs and dormers to reduce costs concerns and maintain usable square footage while also preserving light and air) and better shaping building massing for better context.
 - c. Solar shading and environment impacts on E-W vs. N-S and wider vs. narrow streets need to be evaluated and treated differently as they relate to long term sustainability and livability goals. A one size fits all approach is not supporting our long term climate and resiliency goals.
 - d. Amenity tradeoffs and fast track approaches for highly sustainable projects (e.g. Net Zero Energy buildings) is strongly encouraged. *(fast track approaches for sustainable projects was also discussed by commissioners at the joint meeting of the PSC and Design Commission on 2.9.17)*

By incorporating many of these recommendations above there is an opportunity to reset and rebuild community trust and gain better support for quality density and more cohesive urban infill.