



June 9, 2021

Honorable Mayor Wheeler and Commissioners Hardesty, Mapps, Rubio, and Ryan  
**Re: Testimony in support of DOZA Amendments**

Honorable Mayor and Commissioners:

Restore Oregon writes again to thank the City Council for all of its efforts and to express its strong support for all of the proposed amendments to the DOZA package. As noted in our previous comments, Restore Oregon is particularly interested in prioritizing context-appropriate design that builds upon the diverse cultural, historic and natural features found within our city's unique neighborhoods and communities.

Protecting cultural and architectural heritage is not a privilege to be enjoyed by the few who can afford ownership but, rather, a right that must be conferred to every individual Portlander. Providing much needed housing need not strip the city of memory, context, and diversity to satisfy the whims of market-rate developers. When it comes to design, we have a two-track system and both tracks should result in good outcomes, with larger market-rate projects needing public input so as not to steamroll the community.

Tenants, just like owners, deserve good design and should be involved in the process to develop character-statements and comment on proposed new buildings. These amendments, together, move toward striking the *appropriate balance*, setting the table for future area plans that must prioritize underrepresented areas of the city and be driven by community. Specifically,

### **Restore Oregon Strongly Supports Amendment 3: Main Street Standards Bundle**

We applaud the effort to identify additional design standards that will increase the quality of design within the "m" overlay through the use of a proportionally designed ground floor storefront system and other style-neutral design elements found on buildings new and old. It is not clear why compliance with these standards is "optional" as they provide a sound menu for development teams to choose from.

Textured storefronts, as envisioned by the main street standards bundle, will encourage active ground-floor uses, promote car-free lifestyles, and allow new larger buildings to be adaptable in the future. Because of the sound design principles these standards represent, and the relative rarity of the M-overlay zone, Restore Oregon asks that the "main street standards bundle" be offered as optional points throughout the D-Overlay Zone, and that 4 points from this list be required in the M-Overlay Zone. If required in the M-Overlay Zone, any development team seeking to deviate from these no-to-low cost standards could elect consideration through the alternative design review path.

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## **Restore Oregon Strongly Supports Amendments 4 and 5: Incentivize Affordable Housing by Requiring Design Review for all Non-Affordable Projects over 55 Feet**

In previous comments, Restore Oregon has sought a design review threshold set at four stories or 45 feet. This position reflected the fact that most of the context of main street areas outside the Central City consist of older buildings no taller than four stories. The proposed amendments seem to acknowledge as much by setting the threshold for design guideline review at 55 feet, except for those projects that satisfy reasonable affordable housing eligibility requirements. *Amendments 4 and 5—when taken together—reflect a compromise that is grounded in the existing built fabric of our main street areas, while expediting and incentivizing the supply of true affordable housing.*

## **Restore Oregon Strongly Supports Amendment 8: Area-Specific Character Statements**

Last, and **most critical**, is the need for City Council to direct the Bureau of Planning and Sustainability to work with communities on character statements (and design standards) with area-specific plans. Every community deserves to have its unique cultural heritage reflected and respected through the design of new buildings. Without the creation of area-specific character statements and standards, design decisions will be left to market-rate developer who, unlike many of our city's affordable housing providers, often lack the necessary lived experience or motivation to design with community in mind.

An example of where character statements represent a great opportunity is SE 122<sup>nd</sup>. In 2010, the City completed the SE 122<sup>nd</sup> Corridor Study – a pilot project that sought to identify “ingredients” from the community that would make the street more “convenient, livable and healthy.” With respect to livability, the Report found that: “Douglas fir trees are a character-defining asset for the area. Along with community parks, the Springwater Corridor, Leach Botanical Garden and the area's schools they create some of the area's key amenities.” Yet, despite the Design Overlay Zone being present at SE 122<sup>nd</sup> and Division and SE 122<sup>nd</sup> and Stark, the DOZA amendments fail to recognize these character-defining features important to the community. Furthermore, the 2010 Study noted the lack of inventory or evaluation of cultural or historic resources along this corridor, something that must be done – not just along SE 122<sup>nd</sup> but in other areas like Lents, Parkrose, and St. Johns (each of which are in the Design Overlay Zone, but lack any area-specific standards or guidelines).

Again, every area and every community is entitled to high quality design. Restore Oregon urges City Council to acknowledge the character and heritage of all of Portland's unique communities by directing BPS to develop community-driven context statements and design standards for unique areas within the Design Overlay Zone, starting with those communities who have been least represented in the process to-date.

Thank you,



Peggy Moretti