

# Garlynn Woodsong

**#329841 | June 9, 2021**

## Testimony to **Portland City Council** on the **Design Overlay Zone Amendments, Recommended Draft**

While I have submitted comments from the Concordia Neighborhood Association (CNA) on the DOZA proposal, the comment period for these amendments does not allow for sufficient time for me to review these thoughts with the neighborhood association board at a regularly scheduled meeting. Therefore, these thoughts can only be represented as my own. First, as a practicing urban planner with a history working in the State of Oregon and in and for the City of Portland, I feel that it is my duty to caution you, the City Council of Portland, that in my professional opinion, the proposed DOZA Standards were not developed in a manner that is compliant with DLCD's Goal 1. Goal 1 calls for "the opportunity for citizens to be involved in all phases of the planning process." It requires each city and county to have a citizen involvement program that addresses: - Opportunities for widespread public involvement - Effective two-way communication with the public - The ability for the public to be involved in all phases of the planning process - Making technical information easy to understand - Feedback mechanisms for policy-makers to respond to public input, and - Adequate financial support for public involvement efforts. In my opinion, and there may be other opinions on this topic, Goal 1 must be met for every project, and for a project that involves multiple, separate deliverables, such as standards as well as guidelines, it must be met for all components of a project. I do not believe that the process for the development of the DOZA standards would be judged by a clear and objective observer to be in compliance with Goal 1, and I think that Council needs to be aware of this opinion before making any decision to adopt DOZA as written. Eyes wide open, as it were. The previously-submitted letter from CNA also covers how the process for the development of the DOZA standards does not appear to be in compliance with multiple goals of the Comprehensive Plan. I will not repeat that content here, but instead will you refer to that letter, which I encourage you to read in its entirety (and am attaching to this testimony for that purpose). With those comments stated plainly, here's what I came here to say: I think it's possible that the DOZA standards are fine, and that all of the proposed amendments will make them better. However, I do not think that the point system has been adequately studied or illustrated for the lay public. I don't see that the point system is based on any sort of planning best practices, or that it rests on any sort of research basis that shows that it is likely to produce the outcomes desired by the community for our centers and corridors. I think that both the DOZA standards and the point system need to be clearly explained to the public, and to decision-makers. Then, the process needs to pause and listen. Feedback received needs to be incorporated into an updated version of the standards and the points system, and that updated version needs to be brought back to Council for a vote. Even if very few, or

even no changes are made as a result of this process, the resulting illustration of the standards, and simple explanation of the points system, will be invaluable to future project applicants, as well as review staff. If, after reviewing this commentary, you still feel that the City is in such a blasted hurry to adopt DOZA that these concerns do not rise to the level of significance to address, then I at least want you to make this decision with full awareness of the potential legal liability that you are agreeing that it is worth it for the City to assume the risk for, of potentially violating both DLCD Goal 1 and several Comprehensive Plan goals and policies. I would never advise a client of mine to take such a risk.

Testimony is presented without formatting.