

S·M·I·L·E

SELLWOOD MORELAND IMPROVEMENT LEAGUE
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April 11, 2019

Kathryn Hartinger, DOZA Project Manager
Portland Bureau of Planning and Sustainability
1900 SW 4th Ave, Suite 7100
Portland, OR 97201-5380

Dear Ms. Hartinger:

The Sellwood Moreland Improvement League (SMILE) Land Use Committee has reviewed the Discussion Draft Report of the Design Overlay Zones Amendments Project (DOZA) and is providing the following comments. We focused our review on the proposed Community Design Standards because almost all new construction in our neighborhood follows those Standards. Four subcommittees reviewed the Standards item by item and we dedicated two of our monthly public meetings to discussing them and drafting these comments. We reference an attached appendix of photos to demonstrate some of our comments.

General comments

- While we focus on the Standards, we want a lower threshold for design review so the public can have formal input on the buildings built in their neighborhood.
- We oppose removing the Design Overlay requirements of the single dwelling zone. Such a policy change will result in our inability to reduce negative outcomes for our neighborhood environment. These damaging consequences include loss of distinctive neighborhood building characteristics and the loss of our green space and tree canopy. The cost of the R2.5 design overlay appears to be minimal and thus minimally affects housing affordability; please analyze the cost of the R2.5 design overlay. In our neighborhood, R2.5 is often adjacent to our centers and thus is where better walkability promoted by the design overlay is most desired. 83% of our R.2.5 lots are 5000 sf or larger, so the proposed changes by the Residential Infill Project would allow up to a 4500 sf four-unit building on a standard R2.5 lot which is much larger than the older single family homes now on many of these lots. These oversized buildings need the additional design standards and guidelines provided by the design overlay to make them as compatible with the neighborhood as possible. The R2.5 and R2 zones will be very similar upon completion of the Residential Infill and Better Housing by Design Projects

so why R2 can have a design overlay and R2.5 could not is unclear and arbitrary. Finally, in the 1996 Comprehensive Plan, the d-overlay was applied to the R2.5 zone in SMILE to compensate for increased density south of Tacoma Street. The City should honor its commitments.

Community Design Standards, general comments

- We are supportive of the concept of mandatory standards and optional standards based on a point system dependent on the lot size.
- Several of the optional standards give points for items that are already commonly done which reduces the chances that other optional Standards will be selected. The optional standards should not give points for common practices. Common practices include SP20 (vehicle areas), BM8 (maximum setbacks), and O1 (50-foot setback from water).
- The Standards should provide a public benefit that benefits the public realm. Some of the optional standards, while desirable, do not improve public spaces. These Standards include F18 (windows that open), BM14 (ecorooft), and BM15 (reflective roof).

Community Design Standards: Site Planning

- **SP12 Indoor common rooms**

We support this and suggest that the bonus points be increase to 4. Apartments are shrinking in size. What neighbors used to do was talk over back fences and invite neighbors over to their home. In small apartments, having a common room to share with other neighbors and friends we consider to be a big plus for developing a community and should have stronger incentive.

- **SP20 Vehicle Areas**

We oppose this standard. This is basically common practice. Building a moderate sized building, you do not have to provide off street parking. Giving bonus points for doing something you are already required to do is not acceptable.

- **New required standard SPa: Protect pedestrians from overhanging balconies**

No balcony shall extend over a sidewalk if the sidewalk is not protected from weather and falling objects. Balconies have all manner of storage and uses for the occupant. But whatever is on the balcony can come down on the pedestrians below including water from plants perched on the railing to the plants themselves and other small but dangerous items. Balconies are fine as long as they are set into the building and do not pose a danger to the pedestrians below. See Appendix photos 1a and 1b.

Community Design Standards: Building Massing

- Consider changing the label of the Building Mass items. Our buildings should not be associated with bowel movements.

- Some of these have nothing to do with the mass or scale of the building (BM7, 11, 14, and 15). Consider revising the organization.

No.	Design Standards	Required Alteration	Required New Development	Optional Standards Points	SMILE comment
1	Building Height	x	x		Support. Please clarify what "exceptions" allow a building to exceed this height limit.
2	Ground Floor Height	x	x		Support.
3	Roof Pitch	X	X		This standard would not apply in the Sellwood-Moreland neighborhood.
4	Rooftop Equipment	x	x		Clarification needed: does this apply only to the front or the sides and rear? We support if it applies to rear and sides if there is no adjacent building as tall (Appendix photos 2a and 2b).

			Optional Standards Points	SMILE comment
5	Ground Floor Height Bonus		3 pts	Support, although this provides a double bonus since CM2 already allows 5-foot height bonus for 15-foot commercial ceiling. This encourages unusually tall buildings.
6	Preservation of Existing Façade		Increase to 4 points (from 3)	Support and recommend that 4 points be awarded for preserving the existing façade.
7	Vertical Extension of Existing Building Columns		1 pt	Generally support. It would be helpful to have a picture or drawing of how taller vertical columns proportionally fit on the new façade. Should this option be under the façade points?
8	Maximum Building Setbacks at the Corner		1 pt	Oppose: If there's no minimum setback, this design is simply allowed by the code, so why would it get a point?
9	Building Massing at the Corner		1 pt	Generally support. Define "corner intersection." Is it the corner of two intersecting streets? The corner of the building? Is this wall elevation height limited by maximum building height?
10	Building Window Requirements at the Corner		2 pts	Recommend that percentage of windows and doors be <u>increased to 35%</u> (within 30 feet of the corner intersection) for each wall facing the street .

			Optional Standards Points	SMILE comment
11	Building Signage at the Corner		1 pt	Support. (This standard seems to be a façade element.) Please clarify if the sign is to be within 10 feet of the corner of the building or within 10 feet of the corner of the intersecting streets.
12	Building Facades on Local Service Streets		3 pts	Clarification needed: a drawing would be helpful, what is an architectural projection? Does street right-of-way include the sidewalk? Concept is good (see Appendix photo 4).
13	Buildings Surrounding Outdoor Areas		2 pts	Modify. 1) should be for 75% or more of perimeter, not sides. 2) The outdoor area should be visible to the public (from a street). (see Appendix photos 5a and 5b)
14	Ecoroof		Recommend to reduce to 1 point 3 pts	Recommend that only 1 point be given. An eco-roof has no publicly visible improvement to the building. We like the concept of eco-roofs, but they should not be used in lieu of design features that contribute to the public realm. Does not affect building mass. Energy standards already encourage eco-roofs. (see Appendix photo 2).
15	Reflective Roof Surface		1 pt	Oppose. No publicly visible improvement to the building. We like the concept of reflective roofs, but they should not be used in lieu of design features that contribute to the public realm. Does not affect building mass. Energy standards already encourage reflective roofs.

- **New optional standard BMa: Step-back design. 4 points.**
A step-back design, such as the Sellwood Library, should earn 4 points . See Appendix photo 3.

- **New optional standard BMb: Consistency with neighboring buildings. 2 points.**
The building’s overall size, proportion and other related architectural features, most especially rooflines, shall be consistent with other traditional buildings along commercial and residential transit routes. This design will enhance the overall “look” of the Main Street Initiative’s desire for cohesiveness and context.

Community Design Standards: Street Frontage

No.	Required Standards Alteration	Required Standards New Development	Optional Standards Points	SMILE comment
SF1		X		No comment
SF2			1 increase to 2	An original art mural appears to be a substantial amount of work, comparatively, for 1 point. We recommend increasing it to 2 points for the approval process.
SF3			1 increase to 2	The same standards should apply for an approved city installation.
SF4			1	A water feature would be a beneficial element to a design, encouraging interaction and appreciation of the community, however it requires far fewer application steps than SF-2 or 3, to accomplish.
SF5			Reduce to 1	While seating for mass transit is a benefit to the community it can pose challenges for business owners. If such seating includes a roof covering, who will maintain the enclosure? Is this something the city should provide?
SF6			1	No comment
SF7			2	While our committee agrees a roll-up door increases engagement of the neighborhood, we question the energy expended during hot or cold months when in use.
SF8			3	The enhancement to residential entries on side streets provides a significant improvement to the "neighborhood" feel, with trees, open spaces (patios) etc. We question the number of points awarded. Given the amount of work and the benefit to the community, are 3 points enough? This provision will only be awarded when residential entries occur on side streets in commercial zones. Remove wording "on civic corridors" from first sentence.

No.	Required Standards Alteration	Required Standards New Development	Optional Standards Points	SMILE comment
SF9			2 with the possibility of an additional 2 pts for using chamfered corners	Our committee felt that entry on a corner into a lobby that is for use of all tenants is not required. A defined number of square feet of open space inside the door might suffice. The Sellwood Library building is an example of two corner entries each opening into their own business yet still adding a cohesive element to the building's integration into the "feel" of the neighborhood. We suggest adding 2 additional points if "chamfered" corners are used. See Appendix photos 3 and 7.
SF10	X	X		We feel that a plaque should be required of any building older than 50 years.

- **New required standard SFa: Prohibit partial-daylight basement windows along a sidewalk**

Such windows, often for basement apartments, invade the privacy of both pedestrians and tenants and they break up the base of the building. See Appendix photo 1a.

- **New required standard SFb: Prohibit utility meters along sidewalks.**

These degrade the pedestrian experience. See Appendix photo 6.

Community Design Standards: Facades

No.	Required Standards Alteration	Required Standards New Development	Optional Standards Points	SMILE comment
F1 to F9	X	X		F-1 to F-9 are all standards that this committee feels are necessary for neighborhood engagement and cohesiveness.
F10			3, add bonus to 4	Should 100% of building facade provide weather protection along street transit the point value shall be 4 points.
F11			2	No comment
F12			1	Our committee felt building materials application to side walls was an important and expensive design element and wondered if 1 point was enough.

No.	Required Standards Alteration	Required Standards New Development	Optional Standards Points	SMILE comment
F13			change to 2 bonus to 3	We feel that street facing balconies are critically important to a neighborhood. They are an apartment or condo's front porch and should be encouraged strongly. Extended balconies, which are consistent with street car era design, should be awarded 3 points. If the balconies extend over the sidewalk, then weather protection shall be provided on the ground floor level.
F14			2	Remove" balcony railings attached to exterior wall". It was felt that this poses too large a risk of falling items to pedestrians below.
F15			2	No comment
F16			3	Supports the Main Street initiative for recessed windows.
F17			Decrease to 1	The committee felt there were many options for providing bird safety. Decrease from 2 to 1 points
F18			2, add bonus to 3	3 points should be awarded if ALL of the windows are operable.
F19			Decrease to 1	The committee is assuming that ground floor windows must cover 80% of the ground floor wall area of the street facing façade if the unit is retail, not residential.

- **New required standard Fa: Bottom, Middle, Top.**

New buildings should include design elements that present a bottom or base for the building that visually ties it to the ground, a middle element that can contain one or multiple floors, and a top or finishing element that tops off and ends the design such as an articulated parapet. See Appendix photo 7.

- **New required standard Fb: Exposed building sides**

Require a flat treatment on the sides of buildings that have no required side setback and are two or more stories above the adjacent building. The flat treatment would be a distinctive and pleasing feature using colors, materials, texture, patterns, medallions, and/or a mural. It would not reduce the size of the building or restrict future construction on the adjacent lot. See Appendix photos 2a, 2b, 8a, and 8b.

- **New optional standard Fc: Clerestory windows. 2 points**

If clerestory windows are used in first floor designs, 2 additional points shall be awarded. Clerestory windows are a strong, cohesive design element in the Main Street vision and are commonly found in the street car era design.

- **New optional Standard Fd: Aligned window pattern. 2 points**

Vertically and horizontally align windows. Such windows are a strong, cohesive design element in the Main Street vision and are commonly found in the street car era design.

- **New optional standard Fe: Street car era bundle bonus. 2 points**

Bundle 4 of the 5 following optional standards to create a street car era building. 1) aligned window pattern (Fd), 2) recessed windows (F16), 3) chamfered door if on corner (SF9), 4) Bottom/middle/top (Fa), 5) extended street facing balconies (F13). These are especially important in the low rise street car era districts identified in the 2016 BPS Low-rise Commercial Storefront Analysis at <https://www.portlandoregon.gov/bps/article/576442>.

Community Design Standards: Other

No.	Required Standards Alteration	Required Standards New Development	Optional Standards Points	SMILE comment
O1			Decrease to 2	We strongly support designing with nature and preserving existing natural water features within the development, but 4 points seems like too many compared to others. If floodplain regulations, environmental and greenway overlays, the Clean Water Act, or other regulations already require a 50 foot setback, then points should not be awarded.
O2			2	The public view of natural features supports public access and should be encouraged.

Thank you for the opportunity to comment.

Sincerely,



David Schoellhamer
 Chair, Land Use Committee, Sellwood-Moreland Improvement League
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Appendix

Photos of example buildings

Photo 1. Balconies projecting over sidewalks are a safety hazard that detracts from the public realm (SPa). Partial daylight basement windows along the sidewalk detract from the building and the public realm (SFa). SE 17th and Umatilla.



Photo 1b, Balconies projecting over sidewalks are a safety hazard that detracts from the public realm (SPa). SE 13th and Umatilla.



Photo 2a (east side) and 2b (north front and west side). Morgan building, SE Tacoma and 17th. Visible rooftop structures on the side of a building increase building mass (BM4). On the sides at the property line color and texture are used to avoid a blank wall (Fb). The building advertises that there is an ecoroof, which is not visible to the public (BM14).



Photo 3. Sellwood Library. Perhaps the most liked large building in Sellwood, the Library building is stepped back from the street and corner. The optional standard for building massing at the corner (BM9) would discourage construction of this building. We propose that construction of stepped-back buildings like this should be encouraged (BMa). Potted trees on the patios provide more greenery in the public realm than the ecoroof shown in photo 2. The chamfered corner is a common element at corners in our neighborhood that reduces building mass and improves pedestrian safety (SF9).



Photo 4. A building façade (in shadow) under construction facing a local service street (SE 13th and Lambert). More articulation would improve the façade (BM12).



Photo 5a. A publicly visible outdoor area under construction with surrounding building on 3 sides (SE 13th and Lambert). Standard BM13 would improve this open space in the public realm.



Photo 5b. A private outdoor courtyard with surrounding building on 4 sides, adjacent building above not shown and no photo possible,. Standard BM13 would provide points for a space hidden from the public. 8222 SE 6th Ave.

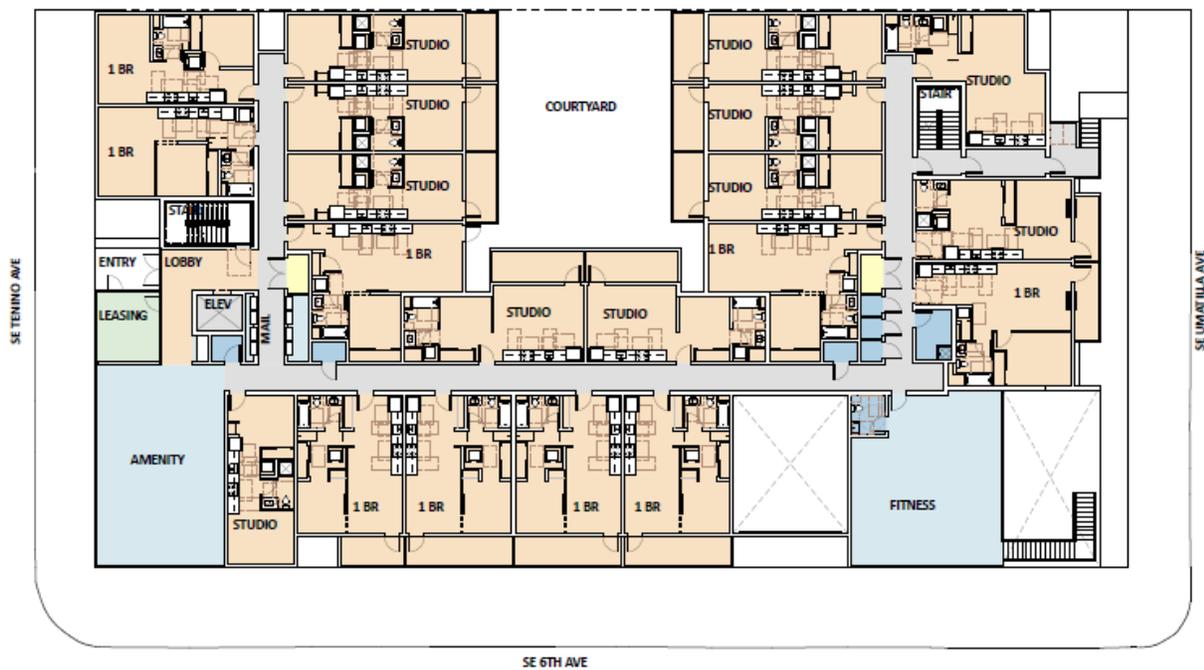


Photo 6. A gas meter for a new building along a busy commercial sidewalk at the corner of SE 13th and Spokane. We propose a new street frontage standard SFb to prohibit utility meters along sidewalks.



Photo 7. A streetcar era building with a well-defined bottom, middle, and top. SE 13th and Umatilla. We propose a new facade standard Fa to encourage buildings with well-defined bottom, middle, and top. The chamfered corner is a common element at corners in our neighborhood that reduces building mass and improves pedestrian safety (SF9). The windows are aligned (Fd) and recessed (F16). This building would qualify for the street car era bundle bonus (Fe).



Photos 8a (SE 17th and Tacoma) and 8b (SE 13th and Lambert). We propose a new required standard (Fb) for a flat treatment on exposed building sides which are visible from up and down the street. The front of a building is less visible than an exposed side. Photo 7a shows fake windows on the building side which are commonly ridiculed. Photo 7b shows an exposed large planer side wall with no windows under construction. Also see photos 2a and 2b.

