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October 16, 2019

Portland Planning and Sustainability Commission and
Portland Design Commission
DOZA Testimony
1900 SW 4th Ave, Suite 7100
Portland, OR 97201

Dear Commissioners:

The Sellwood Moreland Improvement League (SMILE) Land Use Committee has reviewed the Recommended Draft Report of the Design Overlay Zones Amendments Project (DOZA) and is providing the following comments. We focused our review on the proposed Design Standards because almost all new construction in our neighborhood follows those Standards. 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. Four subcommittees reviewed the Standards item by item and we dedicated three 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.

We thank BPS staff for making some of our requested changes to the Design Standards in the Discussion Draft Report.

## Sellwood-Moreland Main Streets Design Initiative and design standards

We were very disappointed that BPS staff did not adopt our recommendations to implement some of the PDX Main Street Design Guidelines (https://www.pdxmainstreets.org) in the Design Standards.

Sellwood-Moreland's mixed-use commercial districts have a distinctive architectural character comprised primarily of brick one and two-story street-car-era buildings with main street storefront patterns and one or more stories of upper level offices and apartments in places. Many buildings feature cornices, eaves, awnings and brick corbeling that cap the buildings, and provide rain protection as well as relatively inexpensive and artful ornamentation. Architectural details include chamfered corner entries, arched entries and openings, vertically proportioned upper story windows, and classic storefront displays with clerestory windows above, raised sills below, recessed entries and pedestrian oriented signage in distinctive fonts and shapes (e.g blade signs). These buildings most commonly feature materials in brick, wood, stone and stucco. The 2016 BPS Low-rise Commercial Storefront Analysis (https://www.portlandoregon.gov/bps/article/576442) includes more information and describes similar areas elsewhere in the City.

The Sellwood-Moreland Main Streets Design Initiative is a community project to create a vision and design guidelines that can better shape anticipated development along our core main street areas with greater sensitivity to local character. We seek to preserve the wonderful characteristics of our neighborhood while accommodating growth. Growth is necessary and inevitable given the housing shortage in the City. SMILE recently adopted the PDX Main Street Guidelines for application to Sellwood-Moreland core commercial Main Streets. We have been working with PDX Main Streets, Qamar Architecture, Forage Design, the Sellwood Moreland Business Alliance, and the community to customize these voluntary guidelines and to proactively set our goals for new development. We have held two public meetings with 60 participants and received input from another 70 people at neighborhood events.

Main Street Design guidelines we propose to be part of the Design Standards are

- Vertically and horizontally aligned windows
- Recessed windows
- Clerestory windows
- Chamfered corner entrance
- Distinct base/middle/top
- Extended balconies
- A Main Street bundle bonus for doing 5 of the 6 items above

There are other Main Street guidelines that could be included in the Design Standards and other ways to implement the guidelines; we are open to suggestions.

**We strongly believe that, at a minimum, Main Street Design standards should be applied where the design overlay and the main street overlay overlap.** Zoning code 33.415.010 states that "The Centers Main Street overlay zone encourages a mix of commercial, residential and employment uses on the key main streets within town centers and neighborhood centers identified in the Comprehensive Plan. The regulations are intended to encourage a continuous area of shops and services, create a safe and pleasant pedestrian environment, minimize conflicts between vehicles and pedestrians, support hubs of community activity, and foster a dense, urban environment with development intensities that are supportive of transit."

Incorporation of the Main Street Guidelines into the Design Standards would accomplish many goals and policies in the 2035 Comprehensive Plan including:

- Goal 4.A: Context-sensitive design and development New development is designed to respond to and enhance the distinctive physical, historic, and cultural qualities of its location, while accommodating growth and change.
- Policy 4.1 Pattern areas. Encourage building and site designs that respect the unique built natural, historic, and cultural characteristics of Portland's five pattern areas described in Chapter 3: Urban Form.
- Policy 4.2 Community identity. Encourage the development of character-giving design features that are responsive to place and the cultures of communities.
- Policy 4.3 Site and context. Encourage development that responds to and enhances the positive qualities of site and context — the neighborhood, the block, the public realm, and natural features.

- Policy 4.27 Protect defining features. Protect and enhance defining places and features of centers and corridors, including landmarks, natural features, and historic and cultural resources, through application of zoning, incentive programs, and regulatory tools.
- Policy 4.48 Continuity with established patterns. Encourage development that fills in vacant and underutilized gaps within the established urban fabric, while preserving and complementing historic resources.

## 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.
- No testing of the Standards was done for the CM1 or RM1 zones or for a 5,000 sf lot (Appendix D). The smallest lot size tested was 10,000 sf. Development in our neighborhood generally occurs 5,000 sf lot by 5,000 sf lot. The Standards should be tested in the CM1 and RM1 zones and for a 5,000 sf lot. Lack of testing results in loopholes and testing should specifically look for loopholes. For example, on a 5,000 sf RM1d lot, maximum building coverage is 50%, so the QR5 20 by 30 foot outdoor area and 3 points are easily obtained. Standard QR8 awards 2 more points if adjacent building height is less than twice the smallest outdoor area dimension (2×20=40 ft), which is automatically obtained because RM1 building height is limited to 35 feet. The required 5 points for the 5,000 sf lot are thus obtained.
- The required 5 points for a 5,000 sf lot appears too easy to achieve. For example, using 100% materials from the extensive materials list (instead of the required 80%, QR17, 2 points), using the same materials on the front 10 feet of the building sides (QR18, 1 point), no parking (PR21, 1 point), and a computer-generated environmental assessment report (QR19, 1 point), satisfies the 5 point requirement.
- 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 PR21 (vehicle areas), C1-1 (maximum setbacks), C1-2 (tallest point near corner), PR3 (Ground floor commercial space) in the Main Street Overlay, and C11 (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 QR14 (windows that open), QR19 (Environmental Assessment), QR22 (ecoroof), QR23 (solar energy system), and QR24 (reflective roof).
- Table 420-3: There are restrictions on Fiber Cement Wall Cladding in Town Centers and Civic Corridors. Why are Neighborhood Centers not included? Should the restrictions apply to Neighborhood Centers also?

## Design Standards: Table 420-2

Our comments on the Design Standards are in the right column of Table 420-2 beginning on the next page.

| No. | Design Standard | Required | Optional Points | SMILE comment |
|---|---|---|---|---|
| | ***Context (C1 – C12)*** | | | |
| | The standards for context provide an opportunity for development to respond to the surrounding natural and built environment and build on the opportunities provided by the site itself. The context standards are split into the following categories: Building Massing and Corners, Landscaping, Older | | | |
| | ***Building Massing and Corners*** | | | |
| **C1** | **Corner Features on a Building.** The following applies to a new building on a site that has frontage on more than one intersecting street, and where the lot frontages intersect, is located within a town center or neighborhood center, and is in a zone that does not have a minimum building setback from a street lot line. One of the following features must be provided. Additional features may be provided for optional points up to a maximum of 4 points:<br>• The building must be within 5 feet of both intersecting street lot lines. Each street facing wall meeting this standard must be at least 25 feet long.<br>• The highest point of the building's street-facing elevations must be within 20 feet of the corner of both intersecting street lot lines. This wall must project 3 feet above an adjacent wall elevation.<br>• The building must include a plaza at the corner of the two intersecting street lot lines. The plaza has minimum dimensions of 15 feet by 15 feet, and must be hard-surfaced for use by pedestrians or an extension of the sidewalk. The plaza must include benches or seating that provides at least 10 linear feet of seating surface. The seating surface must be at least 15 inches deep, and between 16 and 24 inches above the grade upon which the seating or bench sits. At least one main entrance to a commercial tenant space or a residential lobby must face the plaza.<br>• If a plaza is not provided, at least one main entrance to a commercial tenant space or residential lobby must be located within 15 feet of the two intersecting street lot lines, and face the street with the highest transit designation. | X | If done as additional option:<br>1pt<br>1 pt<br>2pts<br>1 pt | • Oppose: If there's no minimum setback, this design is simply allowed by the code, so why would it get a point?<br>• This appears to be a common practice, should it be one point?<br>• Support<br>• We suggest adding an additional point if "chamfered" corners are used. See Appendix photos 3 and 7 |

| No. | Design Standard | Required | Optional Points | SMILE comments |
|---|---|---|---|---|
| **C1** (contd) | • At least 30 percent of each street-facing facade located within 30 feet of the intersecting street lot lines must be windows or main entrance doors. Windows and doors used to meet ground floor window requirements may be used to meet this standard.<br>• At least one sign must be provided within 10 feet of the intersecting street lot lines. The sign may be up to 32 square feet in area and meet the requirements of Title 32. | | 1 pt<br><br>1 pt | • Recommend that percentage of windows and doors be increased to 35% (within 30 feet of the corner intersection) for each wall facing the street .<br>• Support |
| C2 | **Building Facades on Local Service Streets.** Buildings with street-facing facades on local service streets must divide the building elevations into distinct wall planes measuring 1,500 square feet or less. To qualify, the façade plane must be offset in depth by at least 2-feet from adjacent facades. Facades may also be separated by a balcony or architectural projection that projects at least 2 feet from adjacent facades for a minimum distance of 8 feet. Projections into street right-of-way do not count toward meeting this standard. | | 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). |
| ***Landscaping*** | | | | |
| C3 | **Tree Preservation.** Preserve existing trees. For each tree preserved that is greater than 20 inches in diameter, 1 pt. may be earned up to a maximum of 4 pts. An arborists report must be provided that identifies the diameter of each tree to be preserved and verifies that it is | | 4 pts max | Support |
| C4 | **Grouping of Trees.** Within the eastern pattern area shown on Map 130-2, plant at least 5 evergreen trees in a group. Trees must be a minimum of 5 feet in height, planted no more | | 2 pts | No comment |

| No. | Design Standard | Required | Optional Points | SMILE comment |
|---|---|---|---|---|
| C5 | **Native landscaping.** On sites that are 20,000 square feet or larger, at least 30 percent of the total landscaped area must be planted with native species listed on the Portland Plan List, and 80percent of all trees planted on site must be native trees listed on the Portland Plant list. | | 1 pt | We would like to see this applied to smaller lots. |
| C6 | **Trees in Setbacks along a Civic Corridor.** On sites located on a civic corridor shown on Map 130-1, plant trees within the required building setback from the civic corridor. A minimum of 4 trees must be planted and the trees must meet the L1 spacing standards. Areas dedicated to parking lot landscaping do not count toward meeting this standard | | 1 pt | Should this apply to neighborhood corridors also? |
| ***Older Buildings /History*** | | | | |
| C7 | **Preservation of Existing Facades.** When altering or adding on to a building that is at least 50 years old and has at least 4,000 square feet of net building area, retain more than 50 percent of the area of the existing street- facing building façade. | | 3 pts | Support and recommend that 4 points be awarded for preserving the existing façade. |
| C8 | **Vertical Extension of Existing Building Features.** When vertically adding on to a building that is at least 50 years old, include one of the following features as part of the addition:<br>• If the existing building contains vertical building columns or pilasters, the columns or pilasters are expanded vertically into the expansion. To qualify, the existing column or pilaster must be at least 6 inches wide and project at least 3 inches from the adjoining building wall.<br>• Windows on the vertical extension must be placed directly above the existing windows. The size of the new windows may be up to 20 percent less than the size of the existing windows, but the center of the new window must align with the vertical plane of the center of the existing windows. | | 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. |
| C9 | **Building or Site History Plaque.** If the site contains a building that is at least 50 years old, install a plaque on a street-facing façade of that building that provides information on the previous uses of the building or site. The plaque must be at least 2 square feet in area. | | 1 pt | We feel that a plaque should be required of any building older than 50 years. |

| No. | Design Standard | Required | Optional Points | SMILE comment |
|---|---|---|---|---|
| C10 | **Buildings Adjacent to Historic Landmarks.** The following applies to a new building located on a site that is adjacent to a site that contains a historic landmark. One of the following must be provided. Additional features may be provided for optional points up to a maximum of 3 points . This standard is not required if the new building is adjacent to a landmark building containing only residential uses.<br>• Street-facing ground floor windows in the new building must be as tall asas the ground floor windows in the historic landmark.<br>• The base of the street-facing ground floor windows must be at the same distance above grade as the ground floor windows in the historic landmark.<br>• If the landmark building has transom windows on the ground floor, the new building must include transom windows above the street-facing ground floor windows at the same distance above grade as the transom window on the historic landmark.<br>• The exterior materials on the new building must match the exterior materials on the historic landmark on at least 80 percent of the new building's street-facing façade.<br>• Floor and cornice bands on the new building must match bands on the historic landmark.<br>• If any portion of the new building is taller than the historic landmark, that portion of the new building must be setback 10 feet from the property line adjacent to the site that contains the historic landmark. | X | 1 pt<br>1 pt<br>1 pt<br>1 pt<br>1 pt<br>2 pts | No comment, we have few landmarks |

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| ***Adjacent Natural Areas*** | | | | |
| C11 | **Setback from Waterbodies.** Outside of environmental zones, locate all buildings, structures and outdoor common areas a minimum of 50 feet from the edge of a wetland, or top of bank of a water body, seep or spring located on site. | | 4 pts | 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. |
| C12 | **Public View of Natural Feature.** Outside of environmental zones, provide a view corridor between the public street and an existing natural feature on site, such as a grove of native trees, rock outcropping, wetland, water body, seep or spring. The view corridor must be a minimum of 20 feet wide. The corridor must be landscaped with shrubs and ground cover or include a pedestrian connection to a viewing platform accessible from the street. | | 2 pts | The public view of natural features supports public access and should be encouraged. |

| No. | Design Standard | Required | Optional Points | SMILE comment |
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| New | **Base, Middle, Top.** | X | | 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 | **Exposed building sides** | X | | 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 | **Clerestory windows** | | 2 pts | 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 | **Aligned window pattern** | | 2 pts | 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 | **Street car era bundle bonus** | | 2 pts | Bundle 5 of the 6 following optional standards to create a street car era building. 1) aligned window pattern, 2) recessed windows, 3) clerestory windows, 4) chamfered door if on corner, 5) Base/middle/top, 6) extended street facing balconies. These are especially needed where the design and main street overlays overlap. See the 2016 BPS Low-rise Commercial Storefront Analysis at https://www.portlandoregon.gov/bps/article/576442. |

| No. | Design Standard | Required | Optional Points | SMILE comment |
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| | ***Public Realm (PR1 – PR26)*** | | | |
| | The standards for public realm provide an opportunity for development to contribute positively to the adjoining sidewalks, streets and trails. They encourage spaces on the ground floor that support a range of uses and create environments that offer people a welcoming and comfortable experience. | | | |
| | ***Ground Floors*** | | | |
| PR1 | **Ground Floor Height.** For ground floor commercial space in new buildings, the distance from the finished floor to the bottom of the ceiling structure above must be at least 12 feet. For ground floor area associated with a residential use, the height is 10 feet. The bottom of the structure includes supporting beams. | X | | support |
| PR2 | **Ground Floor Height.** For ground floor commercial space in new buildings, the distance from the finished floor to the bottom of the ceiling structure above must be at least 15 feet. For ground floor area associated with a residential use, the height is 12 feet. The bottom of the structure includes supporting beams. | | 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. |
| PR3 | **Ground Floor Commercial Space.** On sites that are at least 10,000 square feet in total site area, at least 1,500 square feet of floor area on the ground floor must be for commercial use and the space must include at least one main entrance that faces the street and is within 5- feet of the street lot line. | | 2 pts | Does this duplicate the requirements of the main street overlay? If so, don't award points for what is already required. |
| PR4 | **Affordable Ground Floor Commercial Space.** Where commercial uses are allowed or limited, at least 1,500 square feet of floor area on the ground floor must be provided for a commercial use that meets the affordable commercial space program administrative requirements of the Portland Development Commission. The applicant must execute a covenant with the City of Portland that satisfies the requirements of 33.130.212.D.2. | | 2 pts | Support |

| No. | Design Standard | Required | Optional Points | SMILE comment |
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| PR5 | **Oversized Street-Facing Opening.** Provide an oversized operable door, such as a roll-up door or movable storefront, for at least one ground floor tenant space that faces the street lot line and is used for Retail Sales And Service uses. Buildings with more than one ground floor tenant space that faces the street and is used for Retail Sales And Service uses must provide the door opening for at least 50 percent of the tenant spaces that face the street. The oversized operable door opening must be at least 8 feet wide and cannot open up into utility, garbage , or parking areas. | | 2 pts | 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. |
| PR6 | **Louvers and Vents.** New louvers or other vents on street-facing facades within 5 feet of the street must meet one of the following standards. The measurement is made from the adjacent grade:<br>• The bottom of the louver is at least 7 feet above the adjoining grade; or<br>• The top of the louver is a maximum of 2 feet above the adjoining grade. | X | | Support |
| PR7 | **Exterior Lighting.** On new buildings, exterior light fixtures must be provided on street-facing facades within 20 feet of the street as follows:<br>• The fixtures must be spaced a maximum of 30- feet apart;<br>• The bottom of each fixture is a maximum of 15 feet above the adjoining grade or sidewalk; and<br>• Lights must not project light upward or to the side of the fixture. must not be directed up from the fixture.<br>• Lights on local service streets must meet the glare standards of Chapter 33.262, Off-Site Impacts. | X | | Support |
| ***Entries/Entry Plazas*** | | | | |
| PR8 | **Main Entrance Location.** Main entrances for nonresidential tenant spaces must be located at least 25-feet from a lot line that abuts an RF through R2.5 zone. For alterations that impact the location of an existing main entrance, the applicant must either meet the standard or move the existing entrance further from the single dwelling zone lot line. | X | | Support |

| No. | Design Standard | Required | Optional Points | SMILE comment |
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| PR9 | **Residential Entrance:** This standard applies on streets that are not identified as civic and neighborhood corridors on the Transportation System Plan. At least 50 percent of the dwelling units on the street-facing ground floor of a building must have the main entrance of the dwelling unit have pedestrian access from the street. To qualify for this standard, entrances to at least four individual dwelling units must be provided. The entrance must be set back at least 6 feet from the street lot line and have at least two of the following within the setback:<br>• A wall or fence that is 18 to 36 inches high;<br>• Landscaping that meets the L2 standard;<br>• A tree within the small tree category identified in 33.248.030;<br>• Individual private open space of at least 48 square feet and a minimum dimension of 6 feet, where the floor of the open space is between 18 and 36 inches above the grade of the right of way; or<br>• A change of grade where the door to the dwelling unit is 18 to 36 inches above the grade of the right of way. | | 2 pts | The enhancement to residential entries on side streets provides a significant improvement to the "neighborhood" feel, with trees, open spaces (patios) etc. We are disappointed that the number of points was decreased from 3 to 2. This should be 3 or 4 points. |
| PR10 | **Separation of Dwelling Unit Entry from Vehicle Areas:** This standard applies when there are at least four new ground floor dwelling unit entrances adjacent to a parking area. Doors leading to new ground floor dwelling units that face a vehicle area on site must be set back at least 8 feet from the vehicle area and have at least two of the following features within the setback:<br>• A wall or fence that is 18 to 36 inches high;<br>• Landscaping that meets the L2 standard;<br>• A tree within the small tree category identified in 33.248.030;<br>• Individual private open space of at least 48 square feet and a minimum dimension of 6 feet, where the floor of the open space is between 18 and 36 inches above the grade of the vehicle area; or<br>• A change of grade where the door to the dwelling unit is 18 to 36 inches above the grade of the vehicle area. | | 2 pts | No comment |

| No. | Design Standard | Required | Optional Points | SMILE comment |
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| PR11 | **Ground Floor Entry:** For new development, ground floor entrances to commercial tenant spaces must have at least 6 feet of horizontal clearance from any free- standing columns, walls or other objects that project out from the building. | X | | No comment |
| PR12 | **Seating Adjacent to Main Entrance:** Provide at least 10 linear feet of seating or bench within 25 feet of a main entrance. The seating or bench must be accessible to the sidewalk or trail and the access must be open to the public. The seating surface must be at least 15 inches deep and between 16 and 24 inches above the grade upon which the seating or bench sits. | | 1 pt | No comment |
| PR13 | **Pedestrian Access Plaza:** Provide an outdoor plaza that abuts a sidewalk on a public right-of-way. The plaza must be a minimum of 500 square feet with minimum dimensions of 20-feet. 15 percent of the plaza must be landscaped with a small canopy tree for each 100 square feet of landscaping. The plaza must include benches or seating that provides at least 10 linear feet of seats. The seating surface should be at least 15 inches deep and between 16 and 24 inches above the grade upon which the seating or bench sits. A plaza provided to meet C1 does not count toward meeting this standard. | | 4 pts | Support |
| ***Weather Protection*** | | | | |
| PR14 | **Weather Protection Minimum Requirements:** All canopies, awnings and other weather protection elements that are provided must project at least four feet from the adjoining building wall façade. The bottom of the weather protection structure must be at least 9 feet above the grade underneath it. Alterations to existing weather protection that does not meet the standard must either meet this standard or come closer to conformance with this standard. | X | | Support |
| PR15 | **Weather Protection at the Main Entrance:** The following applies to new buildings and new main entrances.<br>Weather protection must be provided at one main entrance per street lot line. The weather protection must be an awning, building extension or other covered structure. The weather protection must have a minimum width of 5 feet or the width of the entrance, whichever is greater. The weather protection must meet the standard of PR14. | X | | Support |

| No. | Design Standard | Required | Optional Points | SMILE comment |
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| PR16 | **Weather Protection Along a Transit Street.** For new buildings with more than 50-feet of street-facing façade adjacent to a transit street lot line, weather protection must be provided along 20 percent of the street facing facade. This requirement does not apply to street-facing facades more than 20 feet from the street lot line. The weather protection must meet the standard of PR14 | X | | Support |
| PR17 | **Weather Protection Along a Transit Street.** For buildings with at least 30 feet of a street-facing facade within 20 feet of a transit street lot line, weather protection must be provided along at least 50 percent of the street-facing facade. The weather protection must meet the standard of PR14. | | 2 pts | We are disappointed this was decreased from 3 to 2 points. Award an additional point for 100% protection. |
| ***Utilities*** | | | | |
| PR18 | **Location of Utilities.** New electric meters, gas meters and HVAC equipment must be screened from the street by meeting one of the following standards:<br>• The utilities or equipment are enclosed by a building;<br>• The utilities are screened from the street by a wall that is as tall as the tallest part of the utility;<br>• The utilities are mounted to a wall that does not face a street and are set back at least 5-feet from a street lot line; or<br>• The utilities are set back at least 20-feet from all street lot lines. | X | | Support |
| ***Vehicle Areas*** | | | | |
| PR19 | **Pervious Paving Materials:** At least 50 percent of all new vehicle area must be surfaced with pervious pavement approved by the Bureau of Environmental Services as being in compliance with the Stormwater Management Manual. | | 2 pts | No comment |

| No. | Design Standard | Required | Optional Points | SMILE comment |
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| PR20 | **Large Site Parking Area Setback:** On sites that are at least 20,000 square feet in total site area, new surface parking must be set back at least 25-feet from street lot lines. Structured parking must be set back at least 10- feet from street lot lines. | X | | No comment |
| PR21 | **Parking Areas:** There are no parking areas on the site. | | 1 pt | 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 a common practice is not acceptable. |
| PR22 | **Structured Parking and Vehicle Areas:** At least 80 percent of proposed vehicle areas must be covered by a building. The development may meet PR22 or PR23, but not both. | | 2 pts | No comment |
| PR23 | **Alternative Shading of Vehicle Areas:** At least 50 percent of proposed vehicle areas on the site must be covered by buildings, reflective roof shade structures with a Solar Reflectance Index (SRI) greater than 75, or tree canopy. The amount of shade from tree canopy is determined by the diameter of the mature crown spread stated for the species of tree. The development may meet PR23 or PR22, but not both. | | 1 pt | No comment |
| ***Art and Special Features*** | | | | |
| PR24 | **Original Art Mural:** Provide an original art mural that meets the requirements of Title 4. To meet this option, an application for an original art mural must be submitted to the Bureau of Development Services prior to the issuance of the building permit. The proposed mural must meet the following:<br>• The mural is on a wall or structure that is visible from a public right-of-way; and<br>• The mural is at least 32 square feet in area. | | 1 pt | An original art mural appears to be a substantial amount of work, comparatively, for 1 point. We recommend increasing it to 2 points. It is the most expensive and impactful wall treatment. PR25 (2 pts) excludes murals approved by RACC. PR26 (1 pt) is more easily approved. |

| No. | Design Standard | Required | Optional Points | SMILE comment |
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| PR25 | **City Approved Art Installation:** Provide an art feature on the site that has been approved by the Regional Arts and Culture Commission (RACC) and is not a mural. The feature must be set back a maximum of 15 feet from the street lot line with the highest street classification. To meet this option, the applicant must provide the following prior to the issuance of the building permit:<br>• A letter from the RACC indicating the approval of the art.<br>• A covenant in conformance with 33.700.060, Covenants with the City. The covenant must state the steps to be taken by the property owner and RACC to install and maintain the art installation. | | 2pts | Support. |
| PR26 | **Water Feature:** Provide a water feature, such as a fountain, waterfall, or reflecting pool. The feature must be setback a maximum of 20 feet from the street lot line with the highest street classification. The water feature must have the following:<br>• A feature area of at least 6 square feet that contains water year-round; and<br>• A bench or seat with 6 linear feet of seating adjacent to it.<br>The feature can be part of a stormwater facility. | | 1 pt | Support |
| New | **Step-back design** | | 4 pts | A step-back design, such as the Sellwood Library, should earn 4 points . See Appendix photo 3. |
| New | **Prohibit partial-daylight basement windows along a sidewalk** | X | | 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. |

| No. | Design Standard | Required | Optional Points | SMILE comment |
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| ***Quality and Resilience (QR1 – QR24)*** | | | | |
| The standards for Quality and Resilience provide an opportunity for development of quality buildings that provide benefits to current users and can adapt to future changes. They also provide an opportunity for successful site designs that enhance the livability of those who live, work and shop at the site. The quality and resilience standards are split into the following categories: Site Planning and Pedestrian Circulation, On-site Common Areas, Windows and Balconies, Building Materials, and Rooftops. | | | | |
| ***Site Planning and Pedestrian Circulation*** | | | | |
| QR1 | **On-site Building Separation:** New buildings containing dwelling units on the ground floor must be set back 10 feet from other buildings on the site that contain dwelling units on the ground floor. | X | | No comment |
| QR2 | **Vertical Clearance to Pedestrian Circulation System:** For new buildings, building projections such as balconies or bay windows, or skybridges that project over the on-site pedestrian circulation system must have the bottom of the projection be at least 9 feet above the grade of the circulation system below. | X | | No comment |

| No. | Design Standard | Required | Optional Points | SMILE comment |
|---|---|---|---|---|
| QR3 | **Pedestrian Connection to a Major Public Trail:** New development on a site located adjacent to a major public trail designation, that is not part of a street, must provide a connection from the trail to its pedestrian circulation system. | X | | No comment |
| QR4 | **Windows Facing a Pedestrian Walkway:** For new buildings that are within 15 feet of, and face the on-site pedestrian circulation system, at least 15 percent of the area of each façade that faces the circulation system must be windows or main | | 1 pt | Support |
| ***On-site Common Areas*** | | | | |
| QR5 | **On-site Outdoor Common Area:** On sites in the Inner pattern area identified on Map 130-2, provide at least 600 square feet of outdoor common area with a minimum dimension of 20 feet by 20 feet. On sites in the Western or Eastern pattern area identified on Map 130-2, provide at least 800 square feet of outdoor common area with a minimum dimension of 20 feet by 20 feet. The outdoor area must meet one of the following:<br>• The outdoor area is hard-surface, or meets the surfacing materials requirement in 33.130.228.B.3. The outdoor area includes at least 4 linear feet of seating per 100 square feet of area;<br>• The entire outdoor area is a community garden with the area divided into individual raised garden beds. The beds are raised at least 12 inches above grade and can each be between 12 and 50 square feet in area. Individual beds are separated by pathways at least 3 feet in width; or<br>• The entire outdoor area is a children's play area that includes a play structure at least 100 square feet in area and manufactured to the American Society for Testing and Materials (ASTM) standards for public playground equipment. At least 4 linear feet of seating per 100 square feet of area must be located adjacent to the play structure.<br>Up to 20 percent of the outdoor area may be landscaped to the L1 standard. | | 3 pts | RM1 will have 50% lot coverage and 35 foot height limit, so it seems too easy to meet this requirement, even on a 5000 sf lot. When combined with QR8, which is automatically satisfied in RM1, the required 5 points would be awarded for a 5000 sf lot. Close this loophole and identify and close others. |

| No. | Design Standard | Required | Optional | SMILE comment |
|---|---|---|---|---|
| QR6 | **Indoor Common Room.** Provide an indoor common room with a minimum dimension of 20-feet by 20-feet and meets the requirements of 33.130.228.B.2.b(2). | | 2 pts | We support this and suggest that the bonus points be increased. Apartments are shrinking in size. 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. |
| QR7 | **Building Walls Adjacent to Outdoor Common Area.** New buildings with facades facing, and within 10 feet of an outdoor common area must meet the following:<br>• At least 15 percent of the façade that faces the outdoor common area must be windows or doors leading to lobbies, tenant spaces or dwelling units; and<br>• Pedestrian access must be provided between the outdoor common area and at least one entrance for a lobby, tenant space or dwelling unit. | X | | No comment |
| QR8 | **Buildings Surrounding Outdoor Common Area.** Buildings walls within 10 feet of an outdoor common area meeting QR5 must not be taller than two-times the shortest width of the outdoor area. As an example, if the outdoor area is 20-feet by 30-feet, the building walls within 10-feet of this open area could be up to 40- feet above the grade of the open area. | | 2 pts | The outdoor area should be visible to the public (from a street). (see Appendix photos 5a and 5b). This is automatically satisfied in RM1 which has a 35 foot height limit. |

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| ***Windows and Balconies*** | | | | |
| QR9 | **Street-Facing Window Detail.** The following window standard must be met on all new street-facing facades. Ground floor storefront or curtain wall glazing systems are exempt from this standard:<br>• Provide trim that is at least 3 inches wide around 80 percent of the windows; or<br>• Recess the window glazing at least 3 inches behind the exterior wall or window frame for 80 percent of the windows.<br>Alterations must either meet this standard or match the window trim and recess of the existing building for all new windows. | X | | Support. Why were trim width and recessed depth reduced? |
| QR10 | **Upper Floor Windows:** For new buildings and expansions of existing buildings above the ground floor, at least 30 percent of the area of the new street-facing facade above the ground floor must be:<br>• Windows; or<br>• Doors opening up to balconies. | | 2 pts | Support |

| No. | Design Standard | Required | Optional Points | SMILE comment |
|---|---|---|---|---|
| QR11 | **Street-Facing Balconies.** Provide balconies for at least 50 percent of the dwelling units with facades that face a street lot line and are located above the ground floor. There must be a minimum of six balconies to qualify. The balconies must have a minimum dimension of 4- feet by 6-feet. If the balcony has glazed railings, they must have a treatment pattern that is applied using techniques from the *Portland Bird Safe Windows* list. | | 3 pts | 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 an extra point. If the balconies extend over the sidewalk, then weather protection shall be provided on the ground floor level. |
| QR12 | **Sunshades for Windows.** Windows above the ground floor on facades that face south or west must provide sunshades over at least 50 percent of the window openings. The sunshades must be awnings or eaves directly above the window that project out at least 3 feet. | | 2pts | Support |
| QR13 | **Bird-Safe Glazing for Windows.** On façades that contain more than 30 percent glazing, at least 90 percent of the windows must incorporate bird-safe glazing. Treatment patterns and application techniques must be from the *Portland Bird Safe Windows* list. | | 2 pts | The committee felt there were many options for providing bird safety. Decrease from 2 to 1 points |
| QR14 | **Windows on Upper Level Units with Multiple Exterior Walls.** For dwelling units or commercial tenant spaces located above the ground floor that have two or more walls located at building exteriors, provide at least one operable window in each of two or more exterior walls. Each window meeting this standard must provide an operable opening of at least 6 square feet. | | 2 pts | Explain why area was reduced from 7 to 6 feet. 3 points should be awarded if ALL of the windows are operable. |
| QR15 | **Ground Floor Windows:** The percentage of ground floor window required by the base zone is increased to 60 percent. This standard does not apply on sites within the Centers Main Street Overlay Zone. | | 2 pts | Should this apply to commercial and not residential ground floors? Required area reduced from 80% to 60%, so reduce points from 2 to 1. |

| No. | Design Standard | Required | Optional points | SMILE comment |
|---|---|---|---|---|
| ***Building Materials*** | | | | |
| QR16 | **Exterior Finish Materials:** The following apply to new buildings that have a net building area of at least 5,000 square feet:<br>• The exterior finish materials on 80 percent of the building must be materials listed in approved materials list in Table 420-3 excluding windows, doors and trim.<br>• No more than 3 exterior finish materials listed in Table 420-3 may be used per façade.<br>Alterations to buildings with a net building area of at least 5,000 square feet may choose to use this list or use materials which are the same as, or visually match the appearance of, those on the existing building. | X | | Support. Should the restrictions on Fiber Cement Wall Cladding in Table 420-3 apply to Neighborhood Centers also? |
| QR17 | **Exterior Finish Materials:** The exterior finish materials on 100 percent of the building must be materials listed in the approved materials list in Table 420-3 excluding windows, doors and trim. No more than 3 exterior finish material listed in Table 420-3 may be used per façade. | | 2pt | The material list appears to be extensive: is this standard too easy to obtain? |
| QR18 | **Building Materials Application to Side Walls of Building:** The following apply to buildings located 20 feet or closer to the street lot line. Exterior finish materials on the street-facing facade of buildings located 20 feet or closer to a street lot line and on the first 10 feet of the adjoining, but not street-facing, facades must be the same exterior finish materials. | | 1 pt | Support<br>t |
| QR19 | **Environmental Assessment of Building Materials.** New buildings must provide one of the following assessments:<br>• A Life-Cycle Assessment (LCA) of the Building Materials.<br>• If concrete is use, an Environmental Product Declaration. | | 1 pt | Oppose. This provides no information or benefit to the public. The developer is educated only if they read the computer-generated report. |

| No. | Design Standard | Required | Optional Points | SMILE comment |
|---|---|---|---|---|
| ***Roofs*** | | | | |
| QR20 | **Roof Pitch:** The following applies to sites located adjacent to a Civic Corridor in the Inner Pattern area shown on Map 130-2. The roof pitch of new buildings that are more than 35 feet high must not be more than a 1/12 pitch. | X | | This standard would not apply in the Sellwood-Moreland neighborhood. |
| QR21 | **Rooftop Equipment:** New rooftop equipment must be screened by a parapet that is as tall as the equipment, or the rooftop equipment must be set back 3 feet for every 1 foot of height above the roof or parapet. | 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). |
| QR22 | **Ecoroof:** Provide an ecoroof that covers at least 40 percent of the total building roof area or 2,000 square feet whichever is greater. The ecoroof must meet the Stormwater Management Manual's *Ecoroof Facility Design Criteria.* | | 2 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. Energy standards already encourage eco-roofs. (see Appendix photo 2). |
| QR23 | **Solar Energy System:** Provide a rooftop solar energy system that covers at least 40 percent of the total building roof area or 2,000 square feet whichever is greater. | | 2 pts | Recommend that only 1 point be given. A solar energy system has no publicly visible improvement to the building. We like the concept of solar energy systems, but they should not be used in lieu of design features that contribute to the public realm. Energy standards already encourage solar energy systems. |
| QR24 | **Reflective Roof Surface:** At least 90 percent of the roof area not covered by rooftop equipment, vents, skylights, stairwells or elevator enclosures must meet the Energy Star requirements for solar reflectance. This standard does not apply if either standard QR22 or QR23 are used. | | 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. Energy standards already encourage reflective roofs. |

## Single dwelling zones

We oppose removing the Design Overlay requirements of the single dwelling zones. 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.

This testimony was discussed at public meetings of the SMILE Land Use Committee on October 2, 2019 and the SMILE Board of Directors on October 16, 2019. The SMILE Board of Directors unanimously approved this testimony on October 16, 2019. If you have any questions, please contact David Schoellhamer, Chair of the SMILE Land Use Committee, at land-use-chair@sellwood.org. Thank you for the opportunity to testify.

Sincerely,

Tyler Janzen
President, Sellwood-Moreland Improvement League

Appendix

Photos of example buildings

Photo 1. Partial daylight basement windows along the sidewalk detract from the building and the public realm. SE 17th and Umatilla. We propose to prohibit partial-daylight basement windows along a sidewalk (new Public Realm requirement, see table 420-2).

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 (QR21). On the sides at the property line color and texture are used to avoid a blank wall (proposed new Public Realm standard). The building advertises that there is an ecoroof, which is not visible to the public (QR22).

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 (C1-2) would discourage construction of this building. We propose that construction of stepped-back buildings like this should be encouraged (proposed new Public Realm standard). 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 (C1-4).

Photo 4. A building façade (in shadow) under construction facing a local service street (SE 13th and Lambert). More articulation would improve the façade (C2).

Photo 5a. A publicly visible outdoor area under construction with surrounding building on 3 sides (SE 13th and Lambert). Standard QR8 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 QR8 would provide points for a space hidden from the public. 8222 SE 6th Ave.

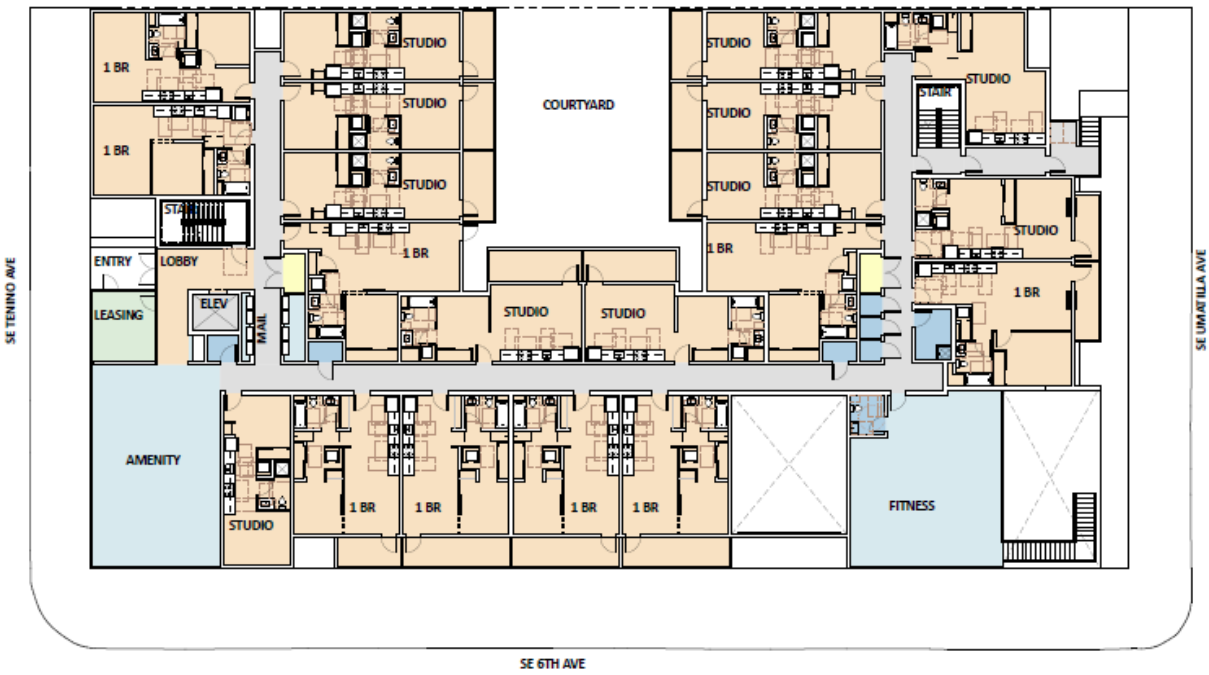

Photo 6. A gas meter for a new building along a busy commercial sidewalk at the corner of SE 13th and Spokane. We support screening of utility meters required by PR18.

Photo 7. A streetcar era building with a well-defined base, middle, and top. SE 13th and Umatilla. We propose a new public realm standard to encourage buildings with well-defined base, middle, and top. The chamfered corner is a common element at corners in our neighborhood that reduces building mass and improves pedestrian safety (C1-4). The windows are aligned (new proposed context standard) and recessed (QR9). This building would qualify for our proposed street car era bundle bonus (new context standard).

Photos 8a (SE 17th and Tacoma) and 8b (SE 13th and Lambert). We propose a new required context standard 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. Fortunately, the building owner volunteered to add a mural. Also see photos 2a and 2b.