



April 29, 2019

**RE: Comments on DOZA**

The Hosford Abernethy Neighborhood District (HAND) has watched the rapid development of Division Street in the Richmond Neighborhood with apprehension. While we recognize that new development brings many benefits to residents, we have also seen the construction of large projects with lackluster design, and we are hoping that the Design Overlay Zone Amendments project (DOZA) will lead to better outcomes as the focus of development on Division and Hawthorne continues to shift west into HAND.

We are specifically concerned with the thresholds for design review, and ask that they be tailored for the degree of impact. For example, we think the standards should be triggered by smaller projects on narrow, more confined streets like Division than on a wider, more traffic-oriented streets like Powell Blvd. On Division, we think projects larger than 10,000 sq ft, or which are 4 or more stories should trigger review. Given the confined nature of the street, even projects of this size can have an outsized impact on the neighborhood.

The DOZA Design Standards and Design Guidelines will act as a citywide guide for developers, but as a general set of standards, they cannot speak to the myriad of special cases that can be found in neighborhoods across the city. HAND and other neighborhoods have developed more tailored plans, either recently as design guidelines, or as neighborhood plans during the era when Planning still supported those efforts. These existing plans should not be discarded. When there is a Design Overlay in place (such as we have along our neighborhood commercial corridors), we would urge you to recognize existing plans and guidelines where they exist, and help residents update them. We also ask that the Bureau of Planning and Sustainability work with neighborhoods that have not developed plans in the past to do so now.

Design is important for everyone, in all areas of the city. We believe strongly in “design equity”, and understand that the best way to achieve it is not to abandon good work done in the past, but rather to help every neighborhood develop an appropriate plan or identify relevant guidelines, suited to its circumstances, and focusing on its priorities. While there is a lot to like in DOZA, neighborhood plans

HOSFORD-ABERNETHY NEIGHBORHOOD DISTRICT

Chris Eykamp, Chair | [www.handpdx.org](http://www.handpdx.org) | [chair@handpdx.org](mailto:chair@handpdx.org)

are necessarily more detailed and better positioned to address the specific needs of an area than a citywide plan could be.

Finally, the proposed change in the purpose statement for the Design Overlay, i.e. “Build on context by enhancing the distinctive physical, natural, historic and cultural qualities of the location while accommodating growth and change” no longer includes reference to the earlier idea of promoting “the conservation, enhancement and continued vitality of areas of the City with special scenic, architectural, or cultural value.” The photos in the design guidelines are overwhelmingly of new buildings, and it appears there is little focus on conserving what is currently in place. As a neighborhood losing much of its distinctive architectural character, we urge you to strike a better balance between old and new. With many good examples of modern buildings incorporating elements of older structures, it should be clear it is possible to simultaneously meet the goals of preservation and modernization.

Thank you,

Chris Eykamp  
Chair, Hosford Abernethy Neighborhood District