



Bureau of Planning and Sustainability

Innovation. Collaboration. Practical Solutions.

---

## MEMO

**DATE:** September 20, 2016

**TO:** Portland Design Commission

**FROM:** Lora Lillard, Bureau of Planning and Sustainability

**CC:** Kara Fioravanti

**SUBJECT:** Design Commission Briefing on 9/22: Preliminary Findings from the Design Overlay Zone Assessment

---

Design Commissioners:

This Thursday, Mark Hinshaw of Walker Macy will walk through their progress to date on the Design Overlay Zone Assessment. Walker Macy and team is nearing the end of the second phase of work, the assessment itself. During the briefing, he will share with you their preliminary findings and observations derived primarily based on stakeholder interviews. Attached are three pieces for your review:

- Draft Outline of the Final Design Overlay Assessment Report (in progress)
- Draft Preliminary Report of Findings
- Major Themes from Interviews

We look forward to the discussion!



City of Portland, Oregon | Bureau of Planning and Sustainability | [www.portlandoregon.gov/bps](http://www.portlandoregon.gov/bps)  
1900 SW 4th Avenue, Suite 7100, Portland, OR 97201 | phone: 503-823-7700 | fax: 503-823-7800 | tty: 503-823-6868

*Printed on 100% post-consumer waste recycled paper.*

# Outline

## Final Report

1. Executive Summary
2. Review of Peer Cities completed
3. Findings
  - a. Introduction and Methodology interim report
  - b. Over-arching Observations interim report
  - c. Specific Findings interim report
    - Interviews completed
    - Questionnaire results collected
    - Site Evaluations in progress
4. Recommendations
  - a. Process
  - b. Tools

### Appendices

- Report on Peer Cities
- Interviews and Major Themes
- Citywide Questionnaire
- Site Evaluations
  - 70 Broad Brush Evaluations
  - 14 More detailed Evaluations

# Design Overlay Zoning Assessment

## **Preliminary Report of Findings**

September 20, 2016

### **Introduction**

The consultant team has taken a multi-pronged approach to investigating issues associated with design overlay zoning and design review. No one method of assessment can provide a complete picture. But by exploring a multitude of sources of information, we can discern certain patterns and commonalities that could underpin eventual recommendations. This interim report is based on research to date, which has primarily involved an extensive series of interviews with stakeholders. A more complete set of findings will be the next step in the process.

This is intended to be an interim report. We are still examining project examples with respect to their results on the ground. Moreover, we are analyzing the results of the city-wide questionnaire. However, themes have begun to emerge that are important to share. We will likely discover some additional aspects as the analysis continues.

These findings should be read not with the thought that each will lead directly to a specific recommendation. Rather, they are suggestive of possible directions, some of which will be broad and sweeping and others more narrowly drawn.

One cautionary note. Any regulatory approach to reviewing design aspects of development can only address particular issues of concern in a community; actions in this arena are part of a larger set of policies and programs.. Indeed, the City is currently considering other actions as embodied in mixed use zoning, residential infill, and street improvement standards, as well as significant revisions to the comprehensive plan. It is commendable that the City of Portland looks at changes in the urban environment through multiple lenses. Changes directed only at singular issues rarely have a meaningfully positive impact.

These interim findings are intended to identify issues that could be addressed through both administrative and legislative actions. They are offered in light of improving a system that is not entirely dysfunctional but rather could greatly benefit from deliberate and thoughtful modifications.

# Research Methodology

In order to fully assess the range of issues in this subject, we have employed a multitude of techniques. Previously, we researched cities with comparable approaches to directing the design quality of development. By comparing and contrasting Portland's approach with other peer cities, a number of lessons were extracted. The Report on Peer Cities can be found on-line at <https://www.portlandoregon.gov/bps/article/588187>

## 1. Interviews with Stakeholders

The Consultant team spent several weeks interviewing stakeholders. These included people in development and real estate, design professionals, neighborhood groups, City staff, and Design Commissioners – both current and past. A number of common themes were repeated by wide ranges of people. This report includes a summary that highlights the most frequently repeated comments and issues. An appendix to this report catalogues all comments, even those said by only a single individual. As a whole, the comments provide an excellent basis for going forward with approaches to making the review process and criteria operate more effectively.

## 2. Public Questionnaire

In addition to face-to-face interviews, a questionnaire was placed on the City's website. Approximately 300 people responded. While this was not a controlled, random-sample survey, it provides further indications of aspects of the current system that are not working well. Many of the same themes were repeated by people answering the questions on line, which serves to reinforce the results of the more conversational interviews.

## 3. Assessments of Example Projects

The consultant team also looked at dozens of multiple-family, commercial, and mixed use projects that have been recently built throughout the city. Example projects fall into a number of categories:

- 1) Projects that are required to meet basic zoning standards (i.e. not within the d-overlay).
- 2) Projects subject to the Community Design Standards
- 3) Projects subject to Type II review using the Community Design Guidelines
- 4) Projects subject to Design Commission review, using Central City Design Guidelines.

Seventy projects are being given a cursory analysis. Fourteen others are being given a deeper assessment. This step will reveal what the application standards, guidelines and decision-making processes are producing on the ground.

# Over-arching Observations

These observations have been derived primarily from interviews, as well as an initial examination of example projects. They do not yet reflect the results of the questionnaire, as that data is still being analyzed.

## 1. Portland is National Model for Good Urban Design

Portland is recognized internationally for actively creating a city that is highly walkable, culturally distinguished, very civil, and eminently livable. Few North American cities can match Portland with its long-standing commitment to the public realm and investments in collectively shared public places, including urban parks and squares, transit choices, bicycle infrastructure, and civic buildings. The City's insistence on design quality is evidenced in many parts of the community, in both public and private development. There is a strong respect for history and, at the same time, a willingness to explore innovative design ideas and to nurture a wide variety of unique and neighborhoods, buildings, and streets.

*Achieving creativity, variety, and place-specific results in the built environment is perhaps being discouraged by the current procedures and standards of review.*

## 2. Community Support for Thoughtful Design

People in Portland, whether residents, merchants, property owners, or developers generally seem to recognize the high value that the City places on design and laud its efforts to achieve that. Virtually no one we spoke with dismissed the value of having procedures and standards to guide the quality and character of buildings. But neither did anyone indicate that the system being used is functioning well. Indeed, many people were entirely forthcoming about issues and flaws. As a result of this assessment, we see no need to characterize the system as wholly "broken." From the interviews, we learned that a number of elements are missing, out of date, unclear, or inadequate to meet overall expectations. Furthermore, we heard that the standards and guidelines used for reviewing proposed projects are not effectively reflecting the varied character and interests of different neighborhoods and corridors. A robust process of involving the public throughout the city could result in more area-specific tools. Finally, when design teams have actually engaged with neighborhood groups for a proposed project, it is not clear what kind of responses emerged to address the commentary.

*The process of shaping implementation tools, such as the d-overlay, has not been linked closely enough to community-driven urban design planning.*

### **3. Good Intentions Frustrated by Current Volume**

The Design Commission, along with City staff, has played a key role in elevating and maintaining the quality of design throughout the community over several decades. Nonetheless, the system of ensuring quality in the built environment is in need of some thoughtful re-examination. The recent, massive increase in the quantity of development and redevelopment throughout the city has put a sharper point on the mechanics, procedures, and rationale for making decisions about design proposals. It has overwhelmed what could be a smoother and more thoughtful process of review. Both staff and Design Commission have had difficulties wrestling with workload. We heard from the design and development community that they have become frustrated with the process, which has become time consuming and costly. We have also heard that citizens do not feel their input is being fully recognized in the decision-making process.

Methods of managing the Commission workload are needed. Keeping discussions on point and with reference to specific guidelines, rather than personal preferences would be enormously useful in making the process more transparent and organized.

*There is a need to consider ways of reducing the workload, as well as managing the workload, more effectively.*

### **4. Having the Right Tools is Critical**

Some of the Community Design Standards and Guidelines that the City has been applying were developed and adopted more than twenty years ago. In reviewing those standards, four characteristics are evident. One, they reflect a much earlier period of thought about urbanism, community character and diversity of design expression. In that era, “neo-traditional” views regarding building design were prevalent. Second, they came out of a desire to guide development in a particular area of the city with a specific, long- established character. They apply less successfully to other areas of the City that have new patterns of development or are transforming. For these changing areas, different tools, such as those that address site design, might be useful. Third, we have repeatedly heard that they do not reflect the many different established neighborhoods, with their own distinct qualities, histories, demographics, and cultures. Finally, the plethora of standards and guidelines can be both daunting and confusing; even where to find applicable ones can be a challenge.

Given their age, the standards might be resulting in buildings that would not be approved if they had gone through a discretionary process with greater scrutiny. The guidelines that direct development in the Central City are more recent and more informed by current development practices, but even they contain some aspects that are vague, subject to widely varying interpretations, or simply not always applicable.

*Consolidating and simplifying review criteria, as well as providing a method for contextual application would be very useful.*

## **5. Shift towards Details and away from the Big Picture**

One of Portland's significant contributions to governing cities is the posture of taking the long view as it builds great streets and districts. Rather than merely reacting to momentary situations as they occur, the City has a tradition of advancing policies, programs, and projects that seek to build a healthy, diverse community. The review of development with respect to design quality was originally established with this view; that the whole is greater than simply the sum of individual parts. And the long view is about creating great places over time, less so about the detailed aspects individual structures.

In recent years, however, this social compact has become fractured, with a focus on details and minutiae that greatly exceed what other cities attempt to regulate. Recently, there has been an emphasis on discrete building components of projects; this was evident in repeated comments regarding subjects such as fasteners and specific cladding materials. The process of design review does not seem to be in sync with the typical sequence of designing buildings in which broad issues are dealt with first with iterations of increasing detail addressed later.

*The amount of detail discussed regarding building components upfront may not be allowing sufficient discussion of larger issues of context, neighborhood character, massing, and relationships to the street.*

## **6. Process and Collaboration**

Regulatory tools and techniques are necessary to maintain consistency, due process and fairness. But it should also be recognized that any system of democratic decision-making still comes down to the interaction between multiple people. Attitudes, demeanor, comportment, sense of collaboration, and willingness to clearly communicate by all individuals and organizations involved in the process are important. The resolution of issues is not always found in the legislative arena, but in the realm of basic human behavior. Attitudes that seem arrogant, non-collaborative, dictatorial, or obstructionist can taint the process and turn it from being inspirational into an impediment to a collective community spirit. Although Portland has a reputation of effective local governance, design review seems to be on the edge of this tipping point. This points out a need for procedural rules that provide transparency, fairness, clear expectations, and specific references to adopted decision criteria.

*For both City staff and Design Commission instilling a greater spirit of collaborative problem-solving than problem-finding would be useful in creating positive outcomes. It is important to view applicants as people who are trying to build communities, giving them due respect in the process.*

## **7. Current System Doesn't Reflect Varying Impacts of Scale**

Much of Portland's unique character and reputation derives from the abundance of small-scale, home-grown businesses that reflect the individual, if not idiosyncratic personalities, of the people who own and operate them. Indeed, many of Portland neighborhoods are filled with a fine-grained, exuberant mixture of shops, restaurants, food carts, galleries, pubs, and personal services. In the last decade, however, this diverse and distinctive character has been gradually replaced by new buildings with considerably less "hand-crafted" character at the street level.

Development regulations, along with high expectations for design have likely contributed somewhat to this eroding character by making it difficult for small, local developers to be part of the mix. By the same token, thresholds that require alterations and additions to go through discretionary review would benefit from recalibration so that design review can concentrate on projects with greater impact on their surroundings.

*Standards and procedures could be structured to make the small end of the spectrum easier to flourish, even if the design results are not ideal.*

The development system seems more set up for larger scale development, encouraging property consolidation and maximizing zoning envelopes. Moreover, thresholds appear to not match city wide goals and direct larger, more high-impact projects through Type II, rather than Type III where they could receive more public exposure and scrutiny.

*Thresholds for larger projects, such as those that occupy entire blocks, could be restructured to ensure that such projects receive greater scrutiny both through design review and by involving the public in the review process.*

## More Specific Findings

Again, these findings have emerged primarily from interviews, without the benefit of the other two aspects of research.

### Processes

#### A. General

1. Public notice seems inadequate, both with respect to on-site notice and mailed notices. Geographic coverage is limited and renters receive no notice. Consequently, people can feel left out of any way of influencing, or even being aware of, change around them.
2. Dialog between neighborhoods and development teams seems disorganized, uneven, and token. It is not always evident how the design teams have responded to design issues raised in community meetings.
3. The list of submittals is not always appropriate to the typical stages of the design process; considerable detail is requested upfront before it typically occurs in the design process.
4. There is a tendency in building design towards “the middle” in quality and innovation in order to gain approval. More adventurous designs are rare.
5. There is a lack of coordination with PBOT and other agencies in the review process.
6. During construction, there is little in the way of follow-up inspections to ensure that elements of the design are actually built as proposed.

#### B. Non-discretionary Plan Check

- application of Community Design Standards

1. Because they apply city-wide, the Community Design Standards don't appear to always reflect what individual neighborhoods or districts have as priorities with respect to design. Greater variety and flexibility to allow recognition of the context is desired.
2. Because it is not possible to seek adjustments to CDS without opening up the entire project to review, some development teams design precisely to Community Design Standards (CDS) in order to avoid discretionary review – even if it leads to less desirable results.

### **C. Discretionary Design Review**

#### **Type II (City Staff)**

1. Many design teams have a preference for working with staff because they can have many conversations to resolve issues.
2. Staff takes cues from the Design Commission and asks for a considerable amount of information about details and materials, which adds to length and cost.
3. Often there are conflicts with other agencies or internal groups; design teams get caught in the middle and don't receive clear direction.
4. It is not clear who has the final authority when there are conflicts between agencies.
5. Basic elements, such as the location of vaults and building services and garage door setbacks, are sometimes not determined early enough and can create problems later in design.
6. Staff could benefit from a regular training program. Field visits both in Portland and elsewhere would be useful to become familiar with the state of the art in development.
7. Administrative interpretations of guidelines are not made available to the development design community.

#### **Type III (Design Commission, with support by City Staff)**

1. The Type III design review process adds significant time and costs to projects. The amount of time spent in making changes to plans often greatly exceeds what is normally figured into design fees for securing entitlements. Some developers find ways to avoid it.
2. Information requested is not always appropriate to the typical stages of the design process.
3. A considerable amount of discussion is associated details, materials, utilities, and building services. Some of this time could be better spent on larger issues.
4. Both the number and length of meetings have expanded to address details and revisions. Some of all of these could be referred to staff.

5. Specific guidelines are not cited during deliberations. There is a lack of focus that can spin off into other subjects. Moreover, personal preferences seem to dominate some deliberations.
6. Originally helpful at early stage; the DAR now occurs too late to be useful. Some teams avoid it.
7. Management of Commission meetings by staff or the chair to keep everyone on point and on time seems to be lacking. People showing up to present or testify have no idea when items will come up.
8. It would be useful to clarify the Council's "charter" for the Design Commission especially as it relates to authority and focus of reviews.
9. Building massing needs to be discussed and approved at first meeting and not revisited later, as that creates havoc in the design process.
10. The list of "Unacceptable Materials" by the Commission in the "Best Practices Guide" could preclude creative possibilities.
11. Commissioners absent during an earlier review sometimes bring up new issues.
12. The Commission is overloaded with cases, which is slowly down the process. A number of options could be considered:
  - Creating a second commission, with the same or different types of cases.
  - Reducing the number of reviews by adopting a different threshold for Type II and Type III decisions.
  - Focusing the scope of review. For example, addressing only larger site and massing issues and deferring others to staff.

## Review Criteria

### A. Community Design Standards

1. Some corridors subject to Community Design Standards have had development that seems to overwhelm its surroundings. Standards seem to address parts of buildings but do not address very well the relationship to context, significantly breaking down large building masses, or activating the ground level.
2. There are numerous standards with repetition and overlap. They reflect an earlier era of thinking about design in which the effort was focused on embodying traditional elements of architecture.
3. The one-size-fits-all approach doesn't address location-specific patterns, context and public realm sufficiently.
4. Having originated with retaining the character of one particular neighborhood, their application city-wide has presented difficulties and reproduced development patterns that do not recognize the many diverse parts of Portland.
5. The combination of some standards has produced unintentionally awkward results such as off-putting, recessed ground floors with little visual interest and traditional projecting cornices on contemporary building facades.

### B. Design Guidelines

#### **City Center Fundamentals and Subdistrict Design Guidelines**

- for Central City

1. Some discretionary guidelines are too vague, such as “integrate the river,” “Portland personality”) and need to be reconsidered in view of sensible application.
2. Having been written for denser urban areas, some do not readily apply to outlying areas.
3. These have been effective in shaping many buildings within and near the center.

4. In its deliberations and decisions, the Design Commission does not always cite applicable guidelines and perhaps has been adding some of its own on the spot.

### **Community Design Guidelines**

- Outside Central City

### **Special District Guidelines**

1. It appears that these do not present many issues, as they offer flexibility and allow decision-makers to recognize the unique characteristics of an area.
2. These suggest the efficacy of developing standards and guidelines that are tailored to an area in combination with some that are more universal.
3. Just placing the d-overlay on an area or corridor would not ensure that the outcome is desirable. This suggests that there is a missing tool -- guidelines tailored to specific geographic/cultural areas. This could involve some common guidelines as well as one applicable only to a designated area.

## Other Items

1. Corridors currently without any design standards or review are seeing development that is mixed in quality and thoughtfulness. Occasionally, a truly outstanding design has resulted. But many recent buildings tend to be more formulaic and rely on repetitive modules.
2. Moreover, many newer buildings in areas without any standards are coarser in grain and streetscapes that offer relatively little interest at the street level. This is not universally the case, but its prevalent to the extent a rich experience along the street is very spotty.
3. There seems to be a wide difference of viewpoints between some designers and many community residents. The former desire opportunities for unique creative expressions. The latter are looking for development that fits unobtrusively into an established context.
4. Issues related to development are often confused with what is allowed by basic zoning standards. Design standards and design review do not deal with matters of height, density and parking; these are matters of law. It is not appropriate or legally defensible to use review to alter basic code allowances.

## Appendices

Interviews and Themes (available now)

Results of Questionnaire (forthcoming)

Analysis of Projects (forthcoming)

Broad Brush Overview of 70 Examples

More Detailed Assessment of 14 Examples

## Design Overlay Zone Assessment

# Major Themes from Interviews

September 6, 2016

Over the course of two weeks in July, we interviewed more than fifty people about the current d-overlay, the non-discretionary review undertaken by City staff, and the discretionary Design Review process involving either staff or the Design Commission. We also discussed guidelines used in Type II reviews and Type III reviews and the Community Design Standards found in Section 33.218 of the Portland Zoning Code. Interviewees included representatives of neighborhood organizations, professionals in the development industry, architects, landscape architects, planners, City staff in both the Bureau of Planning and Sustainability and the Bureau of Development Services, and current and past Design Commissioners.

Virtually all of the people interviewed recognized the value of design overlay zones. They also spoke to the need for clarity and explicitness in the criteria for both discretionary reviews and non-discretionary plan checks, regardless of who is making the decision. The City of Portland is well-known nationally for elevating the quality of urban development; most of the people interviewed recognized that Portland has indeed raised the bar in design of buildings. No one called for an elimination of the review process, guidelines, or standards. On the other hand, no one asserted that the current process is perfect, as is. There were widely-shared observations about issues in the current system that need to be addressed.

It should be noted that, typically, when interviews about regulatory subjects are conducted, many people immediately assume a critical perspective. Because development in urban areas is frequently contentious, with sharply drawn opinions, participants tend to feel frustrated and vent even in the best of circumstances. However, over the past couple of years, all stakeholders have been burdened to varying degrees by the crush of recent permit applications, the pace and intensity of development, and a general concern about the identity and character of Portland. In a sense, therefore, these comments are an expression of on-going angst among all the people involved in urban change. Nonetheless, a number of these comments can form the basis of recommendations for improvement of the objectives, process, and tools.

Dozens of comments have been sorted by subject matter and frequency. The first grouping under each subject contains comments made by at least four and as many as ten people; these have been highlighted in bold. The second group includes those made by two to three people, with the last group made by single individuals. We have included all comments so that the breadth can be seen. Finally, we have also included a group of other comments that do not seem to fit into any category but were stated with enough frequency to suggest that they are also important to examine. All of these suggest directions for potential changes, whether small and simple or more deeply structural.

## **Comments regarding the d-overlay Process in General**

Many people commented:

**Dialog between neighborhoods and development teams seems token, with no documented responses.**

**Public notice is inadequate, both on-site and mailed, regarding geographic coverage and renters.**

**There is a tendency in building design towards “the middle” in quality in order to gain approval; more adventurous designs are rare.**

**Some development teams design precisely to Community Design Standards (CDS) in order to avoid discretionary review.**

**It is not possible to seek adjustments to CDS without opening up entire project to review.**

Several people commented:

Larger issues of urban design and context have been missing lately.

No clear, reliable list of submittals that is appropriate to the normal stages of the design process; considerable detail is requested upfront before it typically occurs in the design process.

Lack of coordination with PBOT and other agencies.

No assistance is available to small businesses / owners on how to navigate the process.

Neighborhood engagement seems minimal, especially for Type II.

Local business / civic associations are not involved in the design review process.

There is no requirement/incentive by City for developers to work with neighborhoods.

There is no consistent method of collaboration (or documentation) with neighborhoods.

There is a need for citizen training in “design literacy” so as to make useful comments.

There is a lack of clarity about how and when people can weigh in.

The design review process adds significant time and costs to projects.

Singular comments:

There is little or no follow-through with inspections.

There are no rewards / incentives for better design.

There is no clear tie with other City priorities.

There should be a way to nurture long term relationships between development teams and neighborhoods.

Lengthy review processes can be a financial burden to smaller developers.

The process favors larger developers with more national brand tenants; smaller developers struggle more with navigating the process and the time involved.

Can more support be provided to neighborhoods during reviews?

How can the process encourage designers to have a strong, coherent idea?

Could the City have small satellite offices in neighborhood centers to assist small businesses navigate the process?

The d-overlay is myopic, seems driven by white, middle-class concerns; communities of color may have other ideas about how they want neighborhoods to look and function.

There is a need to define what success is with the d-overlay. Better relationships with the community are desirable. Aren't social considerations as important as physical ones?

## **Comments regarding Design Commission**

Many people commented:

**There are too many personal preferences and subjects during deliberations.**

**The Commission often over-reaches authority.**

**Commission spends too much time fussing with details, materials, utilities, and building services.**

**Excessive meetings necessary for details/revisions, Commission could refer to staff.**

**Specific guidelines are not cited during deliberation; there is a lack of focus.**

**Timing of review is out of sync with design process.**

**DAR originally helpful at early stage; now occurs too late.**

**There is little meeting management by staff or Chair.**

**The review is unpredictable and time consuming; some will do anything to avoid it.**

**There is a lack of a clear Council-given “charter” with authority and focus of reviews. Or if it is indeed there, does the Commission need to be reminded?**

**Need to resolve massing at first meeting and not revisit later.**

**List of “Unacceptable Materials” by the Commission in their “Best Practices Guide” seems close-minded to creative possibilities.**

Several people commented:

There is no sense of how the length of review affects financing, costs, affordability.

There is too much revisiting big issues later with Commissioners not initially involved.

A single commission is inadequate to deal with the number of cases.

The length of time for testifying too limited.

Neighborhoods feel marginalized by Commission.

Attending daytime meetings requires residents to take off work to testify.

Commission has scrutinized proposals in more detail as a reaction to some poorly built projects in the past.

Design Review can add value, both community value and economic value.

Design review should help people navigate City processes.

The Commission changes direction from time to time depending on the people attending.

DAR's should be required, not optional.

DAR's should be less about detail and more about overall concept.

Commission seems to want everything to be brick.

Central City orientation doesn't translate well to neighborhood situations.

It seems that written testimony is weighed less than oral testimony.

Sometimes the tone of Commissioners can seem arrogant and condescending.

#### Singular comments:

There is no accountability to / oversight by Council.

The Commission seems to often react negatively to prior approved projects.

Commission review is not well suited to smaller projects.

Commission is overloaded; long hours.

Little training is done for new commissioners.

There is not enough discussion by *all* commissioners; consensus not achieved.

Design Review by the Commission requires unusually high design costs.

The Commission is not set up to look at the structure of the community around a proposed project.

## **Comments regarding Staff**

Many people commented:

**There seems to be lack of coordination with other agencies; often there are conflicts.**

**Not clear who has the final authority when there are conflicts between agencies.**

**Applicants need to know the location of basic elements early (e.g. location of vaults and building services and garage door setbacks).**

Several people commented:

Staff is over-worked, overloaded, sometimes not available.

Staff seems to prefer to say “NO” rather than collaborate on issues.

There are too many questionable interpretations of Community Design Standards.

Staff doesn't seem to be empowered to make independent decisions.

Staff is asking for more detailed information and graphics, like the Commission.

More review by staff could reduce load on Commission.

Singular comments:

Training is needed for new staff; field visits both in Portland and elsewhere are useful.

Some staff have acquired Commission's preference for details and minutiae.

No clear description available about what is a good application.

Some applicants dismiss staff direction; prefer to hear from Commission.

More staff (and qualified staff) needed.

Sometimes advice by staff is contradicted by the Commission.

Staff doesn't attend community meetings to get a sense of concerns.

Expand the BDS website to provide more information and guidance to the public.

## **Comments regarding Standards and Guidelines**

Many people commented:

**Too many standards and guidelines, with repetition and overlap.**

**Community Design Standards are weak, ineffective, outdated, reflect an earlier era.**

**Community Design Standards don't address location-specific patterns, context and public realm sufficiently.**

**Community Design Standards are not a good fit with so many diverse parts of the city.**

**Some discretionary guidelines are too vague (e.g. "reflect the river," "design coherency.")**

Several people commented:

Lack of FAR Transfer causing smaller, older, interesting buildings to disappear.

Standards and guidelines reflect no clear nexus between policy and regulations.

Standards do not include possible options that are acceptable (a "menu" approach)

Many standards are too fussy / lack of focus / big picture getting lost.

Need more choices in Ground Floor Activation.

No involvement by neighborhoods in design standards and guidelines.

Community design Standards force big, useless overhangs to meet requirement for a "cornice."

Model guidelines for Division could be applied as a starting point elsewhere.

Buildings designed to meet Community design Standards often result in poor quality as the standards do not address high quality detailing.

Could there be a code amendment to allow common modifications and adjustments to proceed in a more expeditious manner?

Singular comments:

CDS don't make sense for larger projects.

Discretion severely limited.

Small tweaks to a design can result in an approval.

No clear relationship between standards and guidelines.

Certain areas of the City have no standards despite the need.

Incentives / requirements for better design needed for a number of corridors.

## **Other Comments**

Many people commented:

**Confusion over importance of contextual versus unique building designs.**

**Streets are shifting to a “coarser grain” / neighborhoods losing idiosyncrasies.**

**Areas without standards are getting poor quality development.**

Several people commented:

Too many boxes with no character or Portland quirkiness.

Prevents terrible projects but is creativity discouraged?

Is Design Review through the Commission over-riding base zoning?

Is the lengthy and complex process sucking the “joy” out of design?