

Good Afternoon Mayor and Commissioners,

You have received the letter from all members of the Design Commission which outlines the items in the DOZA documents that we as a commission are opposed to. What I am testifying about is the footnote which allows qualified housing projects to choose between a Type II or a Type III review and decision process.

The difference between a Type II and Type III is that a type II is reviewed/approved by BDS staff does not have a public hearing requirement – so community members and neighbors are not given the opportunity to voice their concerns on the record in a public forum, recorded for all parties to witness. Further, a Type II review decision is appealed by anyone, the appeal body is the Design Commission.

A Type III hearing has review/approval by the design commission after the project gets guidance/review by BDS staff. At the hearing, the public are welcome to provide testimony for or against the project and the design commission is able to ask those citizens questions regarding their testimony to make sure they are understood. The commission then discusses the merits and weaknesses of the project and makes a decision in full view of the public- recorded for all parties to witness. If a type III decision is appealed by anyone, that appeal body is City Council – so you will get to review it and make a decision.

Reason 1 – The type III process casts a wider net with public notice, has a physical site posting and provides a forum for the public to make comments that are on the public record and heard by more people.

Reason 2- The appeal body for a project as important as affordable housing should be the City Council.

Reason 3 – The housing emergency ordinance originally passed in 2015 already provided an option for developers of projects to choose to do a Type II review instead of a Type III review. Since 2015 only 2 out of all of the affordable housing projects to come through have opted for this type II process. The Type II process saves between 5 days and 26 days on the overall entitlements process. The current recommendation reduces the review to a type II even though there is little appetite from developers to avoid type III reviews because they want to be able to go before city council in case of an appeal.

Reason 4 – To mitigate the concern about review time- the Design Commission and BDS staff can prioritize affordable housing projects and facilitate those Type 3 reviews within 70 days instead of the state mandated 103 days which will bring that review time in line with what happens in a Type II review.

Reason 5 – Affordable Housing developers have sometimes gotten inexpensive land in order to build new housing. These sites can be difficult to build on and difficult to create a good public realm response because of the site constraints. Design Commission has expertise to help projects on difficult sites be successful and meet the city's goals. (add photos)

Reason 6 – Households with little money deserve to live in buildings that benefit from the same level of public discussion that informs, improves and validates the design of all other buildings in the neighborhood. Residents should not be subjected to:

- lower standards for community engagement
- a lower appeal body (DC vs City Council) than other projects in the design overlay zone
- no input from an impartial Commission whose purpose is to make projects better

**The design commission requests that the council restore the requirement for a type3 review for affordable housing developments in the “design overlay” and ask BDS staff to expedite review of affordable housing projects.**

I personally- lived in affordable housing projects during my entire childhood – all the way through high school. It is so important that we – people of lower income and we – residents of Portland – are not stigmatized further by living in buildings that have lower requirements for community engagement than other projects. Community engagement is how those of us who serve the city are confronted with inequities that we weren’t aware of. We cannot move away from processes that improve equitable outcomes we must move towards them.