

To: Portland City Council

Date: May 12, 2021

Re: Design Overlay Zone Amendments (DOZA)

Several years ago, Portland agreed to expand (beyond the central city) its regulation of how new buildings are allowed to look.

The trouble is that when a committee has to review and hear testimony on new buildings one at a time, as it has been in the central city, it can unintentionally kill projects or drive up costs by delaying them for a year or more. Current and future Portlanders can't afford that ... and particularly in the case of affordable housing, **we can't let public hearings in the discretionary design review process become a new way for anti-housing homeowners to kill projects in their neighborhood.**

The good news: City staff, design experts and other community members have developed a point system that creates clear, objective and flexible design standards *without* requiring the potentially slow, costly and NIMBY-vulnerable discretionary process. As builders, designers, and supporters of regulated-affordable housing and of less expensive market-rate housing, we urge the city council to **ensure that this straightforward point system is an option for the vast majority of new projects** outside the central city.

It's delay and unpredictability — risks introduced by any discretionary process — that kill good projects, especially regulated-affordable ones. This is a larger concern than the direct costs of complying with design standards. "Affordable housing often faces stringent financing deadlines from common sources such as LIHTC," wrote Catholic Charities' Travis Phillips in his testimony on DOZA. "Predictability throughout the process and the option to choose a truly clear and objective path is key in these instances."

With the layers of compliance and regulation that is required for most publicly and philanthropically funded projects, the weight of conflicting deadlines and additional pressures makes affordable projects more expensive and difficult to build. An objective point-based system adds little to this weight. A mandatory discretionary process, inherently vulnerable to bad-faith appeals, adds too much.

To quote [the city's own assessment report](#) on DOZA:

*The question is **at what point the acute need for affordable housing outweighs the benefits of extended design review.** The impact comes from costs associated with the length of the review process, potential delays, uncertainty, extra rounds of plan changes and unanticipated higher costs for materials and details that may be required.*

Permanently imposing a full downtown-style discretionary design process on mid-size apartment buildings across the city would be a bad idea for housing affordability, especially for projects that offer regulated affordability.

Measures that could evolve into a design-by-neighborhood-association requirement would be even worse.

We urge you to advance both housing affordability and appealing architectural design by **putting these new objective design standards to work in almost all situations** outside the central city.

Portland: Neighbors Welcome

BRIDGE Housing

Carlton Hart Architecture

Catholic Charities of Oregon

Community Development Partners

Ethos Development

Innovative Housing Inc

HumanKind Homes

MWA Architects

Housing Oregon

Northwest Housing Alternatives

Oregon Smart Growth

Proud Ground

REACH Community Development

ROSE Community Development

SERA Design & Architecture, Inc.

Sightline Institute

1000 Friends of Oregon

