



Northwest District Association

May 12, 2021

Portland City Council

1221 SW 4th Avenue 110
Portland, Oregon 97204

RE: DOZA Recommended Draft

Dear Mayor and Commissioners:

The NWDA experiences the design review process as it is practiced in our city on an ongoing basis. We are generally supportive of the efforts to update the process embodied in the DOZA initiative. While we are in favor of the changes to the “discretionary track” and the Community Design Guidelines, we have, however, a several significant objections to what is being proposed for the “objective track” for design review through the revised prescriptive Design Standards:

1. The Design Standard’s “Global Design Matrix” is an unproven approach without useful precedent in any jurisdiction that we are aware of, and the “case studies” attempting to model the application of this system have inadequately engaged the question of how the system can, and will, be gamed. The NWDA is doubtful that the proposed point-based-system will generally improve on the outcomes of buildings utilizing the objective track, which has historically been employed inappropriately on buildings far larger than the Standards were ever intended to be used for, and, given the absence of meaningful limits on their application, will continue to be used in the same manner;
2. In addition, the building height limit for projects using the Standards is now proposed to be increased from 55’ to 75’, assuring two outcomes: a) that the Standards will be used with far greater frequency, likely marginalizing the discretionary track entirely for most non-high-rise buildings proposed in the City of Portland, and b) resulting in more and bigger buildings with less design quality;
3. The suggestion that increased access to the objective track, and other proposals to limit and exempt proposals from the design review process, in the name of affordable housing is ludicrous. The cost associated with this “regulatory burden” is insignificant relative to the other factors influencing the affordability of the housing (or CRE) market including everything from global commodity distribution to wealth stratification and local speculation fueled by upzoning and unrestricted density transfers.

The NWDA requests that the Council take two actions in the adoption of the DOZA Recommended Plan:

1. Include a provision for a rigorous review and assessment of the performance of the Design Standards between one and two years after their implementation, based on an identified and legislated metric. Direct BDS and BPS to revise and adjust the Standards as needed based on this thorough and transparent review;
2. Defer the adoption of the proposed change in the building height limit until this performance review of the Standards has been completed and has demonstrated that they are sufficient to meet stated design review objectives for buildings of this size and impact.

Best Regards,
Northwest District Association

A handwritten signature in black ink, appearing to read "Steve Pinger", with a horizontal line extending to the right.

Steve Pinger
member, NWDA Planning Committee