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*Brian Shelton-Kelley  
- NeighborWorks  
Umpqua*

May 11, 2021

Mayor Ted Wheeler  
City of Portland  
1221 SW 4th Ave, Room 340  
Portland, OR 97204

Dear Mayor Wheeler and members of the City Council:

Housing Oregon is a membership-based statewide association of affordable housing nonprofits committed to serving and supporting low-income Oregonians across the housing needs spectrum – from homeless to homeowner. We are working towards a day when every Oregonian has a safe and healthy place to call home.

The Portland Metro Policy Council, a program of Housing Oregon, and representative of Portland's affordable housing providers, has three bits of feedback on DOZA:

**1. Please make clear, flexible and objective design standards an option for as many projects as possible.**

We join the Planning and Sustainability Commission and Portland: Neighbors Welcome in supporting the objective standards option for buildings within the D overlay that are up to 75 feet tall.

Mandatory design details can add costs, but those are relatively manageable. For our members, a much larger risk is delay. Overlapping deadlines and time-limited financing options make affordable projects even more vulnerable to delay and uncertainty than market-rate projects.

Through no fault of the design commission, any discretionary process makes projects far more vulnerable to the risk of major delay. An appeal to LUBA generally means another 1,000 hours of work by architects and can delay a project by upwards of a

year. Sad experience has taught us that in neighborhoods with design review, it only takes a relatively few critics of a project to force such a process.

2. **All Housing Bureau-certified affordable housing projects going through the discretionary design review process should have the option of a Type II staff review.** We also echo this Portland: Neighbors Welcome recommendation.

Affordable projects shouldn't have any reason to choose between FAR bonuses and the risk of frivolous appeals.

3. **We oppose any measures that could evolve into neighborhood-specific design rules.** Design standards should apply throughout the D overlay.

Whatever the intentions of those who create neighborhood-specific design guidelines, they risk being captured and co-opted in the future by neighborhoods with more resources.

Our members are working hard to help Portland build the affordable housing our city needs. Please don't make it harder for them to do that. Feel free to contact me if you have questions at 503-475-6056 or [brian@housingoregon.org](mailto:brian@housingoregon.org).

Sincerely,

A handwritten signature in dark ink, appearing to read "Brian Hoop". The signature is fluid and cursive, with the first name "Brian" and last name "Hoop" clearly distinguishable.

Brian Hoop  
Executive Director  
Housing Oregon