

Good afternoon, Commissioners and Mayor,

I am testifying in objection to the proposed Design Standards Threshold that allows buildings up to 75' in height to use prescriptive design standards as an alternative to discretionary design review outside of the Central City and Gateway.

First, I'd like to point out the areas of the city where this threshold generally applies in case that isn't clear to everyone (show map).

Here you can see that only the areas with the diagonal hatch are the proposed (d) overlay areas and that they constitute a small fraction of the city. If this 75' height threshold is instituted, this already small area will **effectively be eliminated**, leaving only tiny pockets of the red areas with the diagonal hatch subject to discretionary review when buildings exceed 75'.

I was a member of the 3x3 group that was created for DOZA between the PSC and Design Commission to align the new standards and guidelines and have strongly opposed this 75' height proposal since its earliest recommendation. I'd like to explain two of the main reasons why, which are **context and community**.

In regard to **context**, prescriptive standards are simply the wrong tool to develop the requirements that are needed for responsive design. Each neighborhood is distinct, and its context can't be summed up with a few standards without becoming generic. However, through design review and guidelines, we can have robust discussions about context and carefully examine it to determine what is needed to complement and enhance it and determine if those needs are met. Also, Standards are especially problematic at larger scales, where the impact of new development is greater and where it can quickly overwhelm the existing context and create its own new generic context based mostly on sheer size.

In regard to **community**, this proposal removes the public from the development equation at a time when public participation is vital to maintaining and enhancing the neighborhood character that we have today and when guidelines are finally moving to incorporate equity and sustainability. However, if we preserve the design review process, we preserve the impartial forum that design review offers the community to give design feedback and participate in work that will significantly impact our neighborhoods.

Some argue that the elimination of this type of review will result in more housing or construction but there is absolutely no guarantee of that since *development convenience is not a guarantee of more development*; in fact, the River District and Conway are great examples of the opposite. What ***is*** guaranteed is that neighborhoods will lose their opportunity to participate ON THE RECORD in a process that is binding, **leaving the responsibility for contextual design in the hands of proformas and checklists.**

These buildings will be around for a hundred years, maybe more. Because of that and because no one knows the impact that the new Standards will have on our neighborhoods, we request that Council err on the side that ***benefits neighborhoods*** and keep the requirement at 55ft, while monitoring the outcomes to see how effective they are and if they are successful at providing the same quality of urban environment as the new Guidelines.