



To: City Council

From: Portland: Neighbors Welcome

Date: June 9, 2021

Re: DOZA Amendments Should Support our Housing Goals

We're encouraged that Commissioner Rubio responded to feedback from the community of affordable builders by proposing **Amendment #4 to allow all truly affordable housing to have the Type II** procedure as an option. We encourage Council to pass this amendment.

We **discourage Council from passing Amendment #5 or any amendment that would expose more buildings with housing to risky and costly appeals**. These appeals discourage housing in our high-opportunity and low-vulnerability neighborhoods and can be avoided by allowing housing taller than 55' to use the Design Standards. Council should not pass this amendment.

Finally, we **discourage Council from passing Amendment #7** to add a new Context standard. We echo the concern of affordable builders that this requirement can stop projects from moving forward by requiring housing to subsidize empty storefronts. Council should not pass this amendment.

What we support:

- **Amendment #4: Affordable Housing Review**
 - PNW supports this amendment to give affordable housing developers options for Design Review, based on the needs of their individual projects
 - If developers are providing long-term truly affordable housing, they should not be excluded, if they are not receiving City funds
 - Affordable builders we've heard from strongly support providing Type II as an option for affordable housing that isn't receiving City funds

What we oppose:

- **Amendment #5: Threshold for Design Review**
 - PNW opposes any amendment that discouraging housing in our high opportunity neighborhoods by exposing it the risky and costly appeals
 - BDS just released [data](#) showing that projects with housing are 20X more likely to be appealed than projects without housing
 - Every time a building with housing is appealed, it discourages future housing from being built, even if that appeal is eventually dismissed



- We can avoid these appeals, by adopting the Planning & Sustainability Commission's recommendation to give all buildings with housing up to 75' tall the option to use appeal-proof Design Standards
- These Standards raise the bar for building designs due to 5 years of collaborative discussions and hard work with the public, City staff, and the Design and Planning & Sustainability commissions
- Design Standards continue to allow the community to provide meaningful feedback to developers through the [Neighborhood Contact](#) process
- **Amendment #7: Ground floor active use in Arbor Lodge.**
 - PNW opposes this amendment as it could require new projects with housing to subsidize retail space leading to higher rents or less housing
 - Comprehensive Plan only required active uses in projects with housing, if there would be sufficient demand to support it
 - In other parts of Portland, it should be an option not a requirement
 - Unanimous opposition to this requirement from affordable builders, because it can kill projects by requiring housing to subsidize empty storefronts

Neutral:

- **Amendment #2: Makeup of Design Commission**
 - While Portland: Neighbors Welcome is neutral on this amendment, we would like to see the spirit of our original proposal-- to include a permanent member with experience living, designing, or building affordable housing on the Design Commission-- continued in other conversations in the future.
 - We look forward to engaging with the City and others in these future conversations on equity and diversity
- **Amendment #3: Main Street Standards**
 - PNW is neutral on this amendment and supports the 5 years of work by staff, Design and Planning & Sustainability commissions to develop culturally neutral Design Standards
 - Our Design Standards should encourage Main Streets with a diversity of cultural and architectural styles
 - Council should consider character statements as a way for neighborhoods to inform designs in their neighborhood instead of codifying a single style
- **Amendment #8: Directive to create character statements**
 - Character statements should be very short - even as little as a single sentence - concentrating on details that comprise character, enhance neighborhood identity, and offer architects useful guidance during project design.



- Statements should not become de facto rezonings prescribing height, FAR, or massing or hyperlocal design manuals that can kill projects or drive up costs, like the Macadam Character Statement with phrases like “new development should be designed to limit scale impacts”.

With the recent passage of Better Housing by Design, the Residential Infill Project, and the Shelter to Housing Continuum project, we're making great strides to grow the number of homes affordable to Portlanders of all incomes. Creating **fairness and consistency in design review** and **reducing the time and cost for project approval** are key components to meet that goal.

Adopting the Design Overlay Zone Amendments project and amendment #4 represents another step towards housing Portlanders in buildings that contribute meaningfully to their neighborhoods through their design. **Let's pass DOZA** and take an important step towards addressing our ongoing housing crisis.

Sincerely,

Doug Klotz, Jóhann Hannesson, Luke Norman,
Equitable Zoning Work Group, Portland: Neighbors Welcome