



Portland: Neighbors Welcome - DOZA Amendment Analysis

Affordable builders are clear: amendments should support housing

Over the past week, here's what affordable builders shared about the proposed amendments:

- **Amendment #4: Affordable Housing Review** - Bridge, Catholic Charities, Innovative Housing Inc, REACH and ROSE want Type II to be an option for affordable housing that isn't subsidized by Portland; one proposed following the Inclusionary Housing standards as a simpler option
- **Amendment #7: Ground floor active use in Arbor Lodge** - unanimous opposition to this requirement, which can kill projects by requiring housing to subsidize empty storefronts

To meet our goals we need both affordable & mixed-income housing

*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.*

[DOZA Coalition Letter](#)

We're encouraged that Council responded to our coalition letter by continuing to allow **affordable housing to choose the flexibility and certainty of the clear and objective Design Standards**. However, we want to echo the housing community's support "*for the vast majority of new projects*" - *both affordable and mixed-income* - to continue to have the option to use the Standards to create the housing desperately needed to address our housing crisis and prevent the shortages that cause future crises.

The lower the height limit will lead to more projects killed, delayed, and made more expensive. - Nick Sauvie, ROSE

Ensuring the **Design Standards are an option for all buildings with housing over 55' tall supports our Comprehensive Plan and Inclusionary Housing goals** for residents of all incomes to live in our highest opportunity neighborhoods.

*Any amendment that removes this option for mixed-income housing works against those goals by **adding the risk of appeals and delays that discourage housing from being built.***



New Housing is disproportionately targeted by appeals

The Bureau of Development Services just released [data](#) showing that almost 1 in 10 new projects with housing approved through Design Review was appealed by the public. And new **projects with housing were 20x more likely to be appealed** than projects without housing.

This means that neighbors with the money, time, and expertise are using the costly appeal process to disproportionately target housing. **Each time a building with housing is appealed, it discourages future housing from being built**, even if that appeal is eventually dismissed. If Council requires any mixed-income building with housing over 55' to use Design Review, we can expect more appeals find "design" problems more frequently when new housing is involved.

Slabtown Square shows that neighbors can delay housing for years

Proposed in 2015, Slabtown Square would bring **200 housing units to a high-opportunity, low-vulnerability** of displacement neighborhood. However, complaints over the plaza design led neighbors to appeal the Design Review's approval to City Council, the Land Use Board of Appeals, the state court of appeals, and finally to the Oregon Supreme Court in 2020.

Allowing more projects to use the Design Standards **protects new housing from the risk of years of appeals**. And a well-designed Inclusionary Housing program can ensure that these projects bring mixed-income housing to our high-opportunity neighborhoods

Design Standards provide clear benefits for mixed-income housing

Over the past 5 years, city staff, the public, and the Design and Planning & Sustainability commissions developed Design Standards to create the high-quality projects Portland expects

Community benefits of allowing all buildings with housing over 55' to use Design Standards:

- Standards continue to allow the *community to provide feedback* to developers in a neighborhood meeting through the [Neighborhood Contact](#) process
- Standards are *appeal-proof* at the project level, so the fear of delays and legal fees doesn't discourage housing in our highest-opportunity neighborhoods
- Standards are aligned with the Anti-Displacement Action Plan's strategy to encourage "infill development through *land use changes that incentivize higher density* housing opportunities" in our high-opportunity low-vulnerability neighborhoods
- Standards help prevent *wealthy neighbors from drowning out other voices* by threatening costly appeals if their demands are not met
- Standards support the [Inclusionary Housing](#) goals by providing flexibility and certainty to developers providing mixed-income housing.

Portland: Neighbors Welcome is a grassroots pro-housing, pro-tenant organization dedicated to ensuring that all Portlanders have safe, stable, and affordable housing.