

Sightline Institute is a regional sustainability think tank. We think cities are good for our society, our environment and our economy, and that everyone who wants to live (or remain) in a city should be able to.

We support the DOZA proposal. Now that we as a city have decided to expand design regulation into neighborhoods outside the central city, it makes sense to reinvent design regulations for the context of low-rise and mid-rise buildings. Those situations are fundamentally different from downtown skyscrapers, and should be treated differently. A point system – assembled by city staff, volunteers, design professionals and the public over the last five years – is a good way to avoid truly bad design ideas without creating needless uncertainty for much-needed housing projects. Meanwhile, the discretionary design review system should also be an option for builders who want to do something slightly outside the bounds of objective code.

We support Amendment 4. It reflects the facts that Portland's need for affordable housing is particularly acute, that publicly funded projects face even tighter timing constraints than market-rate ones, that their funding comes from many different sources, and that the Type IIx process has delivered attractive below-market buildings like the Vera and the Nick Fish.

We oppose Amendment 5. Though we appreciate the gesture to prioritize much-needed affordable project – Sightline helped develop the affordability size bonus in the Residential Infill Project and supported it in Better Housing by Design, Expanding Opportunities for Affordable Housing and Senate Bill 8 – this amendment didn't originate with affordable developers and doesn't seem to be supported by any. Unlike with additional height and FAR bonuses, we don't make it easier for publicly financed homes to exist by making it harder for privately financed homes to exist. Such barriers only drive up the prices of market-rate homes by forcing builders to hide the risk of appeals inside their prices. City data show that in the last eight years, one in 12 housing projects that has been eligible for design appeal has been appealed by the public, 20 times the rate of other projects.

This risk makes market-rate housing more expensive. This is actually good for the profit margins of whichever development firms have the knowledge and status to navigate a risky system. But it's not good for Portlanders, or for people who will want to become Portlanders if more of the planet becomes less habitable in the decades to come.

**We oppose Amendment 7.** Though we respect Commissioner Ryan's neighborhood pride, it wouldn't be a good idea to introduce a spot zoning change, broadly opposed by affordable housing providers, at the last minute of a code reform. Forcing homes to subsidize potentially vacant sidewalk storefronts is a good way to kill projects for little public benefit. The better path to a more walkable Arbor Lodge is to allow homes of all shapes, sizes and prices to exist nearby, while continuing to invest in making Arbor Lodge and all of Portland a great place to live. Commercial investments will be drawn to places like that in the same way that they've been drawn to other great urban neighborhoods.

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