



Portland Design Commission

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Date: June 9, 2021
To: Portland City Council
From: Portland Design Commission
Re: Amendment #4, Elimination of Community Engagement for Affordable Housing Developments

Mayor Wheeler and Commissioners Rubio, Ryan, Hardesty, and Mapps:

Regarding Amendment #4, the Design Commission and other signatories to this letter petition City Council to reject efforts to diminish community engagement for affordable housing developments.

Supporters of eliminating design review thresholds for affordable housing base their arguments on unsubstantiated facts about the risk and frequency of appeal due to NIMBYism, the cost of design review, and the length of time design review adds to the entitlements process.

Review data provided by the Bureau of Development Services to understand the truth:

- Design Review appeals are uncommon. Between 2012 and 2020 BDS processed 37 Design Review appeals, which averages just over 4 appeals per year. Of those 37 appeals, 27 were of new residential projects, which averages 3 appeals per year. There has not been a Design Review affordable housing project appealed to LUBA;
- At most, a Design Review application is ~\$35,000, a cost that is a fraction of a percent of the overall development budget; and
- The design review process is aligned with the design team's schematic design and design development phases of a project, is not part of the permit review process, and does not extend the permit review timeline.

Eliminating the opportunity for substantive community engagement through early engagement and design review stigmatizes affordable housing developments and their residents.

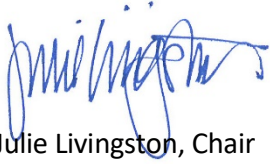
The proposed amendment could be improved with Council requiring a DAR when a development team chooses a Type 2 over a Type 3. Requiring a DAR would:

- Support the goals and policies of the *2035 Comprehensive Plan, Chapter 2, Community Involvement* and *Goal 1 of the Statewide Planning Goals* by curtailing community participation; and
- Deliver affordable housing buildings that are knit into their neighborhoods.

Please maintain the optional procedure for design reviews of affordable housing projects—a Type II (staff level) review and a Design Advice Request (early assistance) meeting with the Design Commission. The current Emergency Ordinance requires a DAR to ensure early involvement from the public, City staff and the Design Commission. Early involvement from all parties ensures certainty and an expedited process.

Sincerely,

The Portland Design Commission



Julie Livingston, Chair



Sam Rodriguez, Vice Chair



Brian McCarter



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Historic Landmarks Commission

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