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Date: June 9, 2021

To: Portland City Council

From: Portland Design Commission

Re: Amendment #5, Height Threshold for Design Review outside Central City and

Gateway

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

Thank you for the proposed amendment #5 to lower the threshold for Design Review to 55 feet for most projects outside Central City and Gateway. The Design Commission and other signatories to this letter petition City Council to reject efforts to increase the threshold for design review of affordable housing outside the Central City and Gateway to 75 feet (7 stories, considered "high-rise" construction by the State-adopted building code) for all buildings.

Walk through any of Portland's neighborhood centers to understand the deleterious impact a 5story building can have on adjacent residential and commercial development, adjacent rights-ofway, and adjacent public and private open spaces:

- Most 5-story (55 feet) and 6-story (65 feet) structures built during and since the last two boom cycles are built to the maximum heights allowed by the Portland Zoning Code; and
- None of the buildings constructed before 2018 were subject to design review because they
 received construction permits before the Mixed-Use Zones project was adopted by Council, and
- The impacts of taller and larger affordable housing buildings are as great as those of market rate housing buildings.

Most "d" overlay outside the Central City and Gateway has maximum heights of 45, 55, or 65 feet, therefore:

 A height threshold for design review of affordable housing projects of 75 feet means taller and larger buildings than those constructed to date will move through the permit review process with no community input.

The Planning & Sustainability Commission's proposal effectively eliminates design review outside the Central City and Gateway.

The proposed increase to the height threshold for design review:

- Contravenes 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 in the review of affordable housing projects;
- Breaks faith with the 2016 deal Council brokered with people who live and work around neighborhood centers—when Council gave them a voice in the projects proposed in their neighborhoods in exchange for greater height and floor area allowances in the zoning code; and
- Hastens the demise of the distinct characters and cultures of Portland's neighborhoods through the use of a checklist of development standards that is intended to deliver consistent results at a city-wide level rather than contextually specific results at a neighborhood level.

Please reject efforts to increase the threshold for design review of affordable housing outside the Central City and Gateway to 75 feet.

Sincerely,

The Portland Design Commission

Julie Livingston, Chair

Sam Rodriguez, Vice Chair

Drian McCarton

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City of Portland Historic Landmarks Commission





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