

Mayor Wheeler and Commissioners  
Re: DOZA Amendments

6-9-21

I oppose Amendment #5, and fully support allowing Design Standards to be used for buildings up to 75' high, outside of Central City and Gateway. The Design Standards were developed over a 5-year process, by the Planning and Sustainability Commission, working with the Design Commission, to give equivalent results. This is in line with the Statewide Planning Goals, and administrative rule 197.307, which requires a "clear and objective" path for most housing. The DOZA proposal brings the city further toward that goal.

The arguments for Amendment 5 seem to hinge on the premise (stated by DZC chair Julie Livingston) that "Standards are NOT equivalent to Guidelines". Yet PSC Chair Kat Schultz, who worked on the entire project as well, believes they will result in equal outcomes.

The Design Commission's letter of June 9 presents sometimes confusing, sometimes inaccurate reasons they oppose the DOZA draft.

1. For instance, they state "larger buildings...will move through the permit review process with *no community input.*" Yet, Portland code requires Neighborhood Contact, and for all but the smallest buildings, a meeting between the developer and the neighbors, and/or Neighborhood Association, is required at the beginning of the process. So there will be "community input" on the project, albeit at the beginning.

2. The letter says the proposal ignores the 2035 Comp Plan, and Statewide Planning goals by "*curtailing community participation* in the review of affordable housing projects". Besides the fact that there are no separate affordable project rules in Amendment 5, these planning goals are about neighborhood and citywide planning efforts, and do not require public involvement throughout each individual building permitting process. There was extensive community involvement in all aspects of the Comp Plan, and many opportunities were offered during the DOZA process as well.

3. They talk of “broken faith” regarding 2016 upzoning and people who live and work around neighborhood centers. Most such centers had primarily CS zoning that was upzoned to CM2. In that zone was indeed greater height, increasing from 45’ to 55’, as well as an FAR increase. But, according to BPS staffer Marty Stockton, who was the BPS Liaison to Southeast Portland during the Comp Plan: “...*staff were very clear with the neighborhoods that the “d” overlay requires the two-track system in accordance with State law.* She adds: “*I was incredibly clear on my messaging on this topic and had a number of professional years of administering Community Design Standards to back it up. Other District Liaison staff for NE, East and West coming from BDS previously were also on point here.*” Neighbors were informed.

In short, Design Commission surely has a lot of faith in their ability to shape projects, but has not told us why following the carefully crafted Standards will not achieve equally successful buildings. And the ability to avoid the increasingly common and sometimes project-killing Appeals, is crucial to getting the affordable, as well as market-rate, housing that our city needs, built in a timely and cost-effective manner.

Thank you.

Doug Klotz