

Dear Mayor and Commissioners,

Thank you for taking testimony on the DOZA amendments and for your attention on this project. I'm Trisha Patterson, and I'm submitting testimony on behalf of myself today.

I support the recommendations to DOZA made by Portland: Neighbors Welcome and the Planning and Sustainability Commission.

I especially **support amendment 4**, which allows more housing projects to choose between Type II and Type III review. This amendment also widens the pool of eligible projects by expanding this choice beyond those that receive City subsidies. It should be easy to build regulated affordable housing-- meaning 60% AMI-- regardless of funding source. I support this amendment because it gives affordable housing developers more options for how they navigate design review, which in turn makes it more likely that affordable housing will be built.

I oppose amendments 5 and 7.

Specifically, amendment 5 reduces the threshold trigger for design review from 75' to 55', except for projects that meet the affordable housing eligibility requirement in amendment 4. I oppose this amendment because it specifically limits and discourages housing in our most high opportunity neighborhoods. This is especially salient in light of Bureau of Development Service's recent findings and testimony on DOZA that [projects that include housing are 20 times more likely to be appealed](#) than projects without housing. We are in a housing shortage of crisis level proportions. We should protect housing from appeals, not subject projects to unnecessary risk. Additionally, I would like to note that the Design Commission describing buildings of 75' as "high rises" is incorrect according to State code. A high rise building as per the IBC/ OSSC has *an occupied floor* more than 75' above the ground. If height limits are 75', there would be no occupied floor above that height, thus these buildings would not be high rise buildings. While this might seem pedantic, it is important to be critical of the language we use when describing desperately needed housing, and it is disappointing to the Design Commission misleading the public and this Council in this way. Portland is a growing and changing city, and I would rather see buildings full of housing along the skyline than homeless encampments along the sidewalks. Finally, I ask this Council to adopt the PSC's recommendation to give all buildings with housing up to 75' the option to use the appeal proof Design Standards pathway.

I oppose amendment 7, which was proposed by Commissioner Ryan to add new Context standards for the eastern edge of the Arbor Lodge neighborhood in the CM3 zone to require ground floor active use in new buildings. I oppose this amendment because it could lead to higher rents or fewer units built if developers must subsidize this use. Additionally, it is a procedural anomaly within the context of the Comprehensive Plan, which states that ground floor active use can only be required if there is a demonstrable demand to support this use. I agree with the many affordable housing developers who have opposed this amendment, and urge this Council to vote no on this amendment.

I hold **neutral opinions on amendments 2, 3, and 8.**

Thank you for considering this testimony and for taking time to hold public input on this important project.

Sincerely,
Trisha Patterson