



April 26, 2017

Portland City Council
1221 SW 4th Ave., Room 130
Portland OR 97205

Dear Mr. Mayor and Commissioners,

The organizations and individuals comprising Portland for Everyone are pleased to offer some brief comments on the Design Overlay Zone Assessment (DOZA) review recently completed by the consultant Walker Macy.

We urge the City to:

- 1) Support the consultant's recommendation to clarify that the scope of design review doesn't include changes to entitlements given by long-range planning and zoning (and therefore the number of homes the City has already planned for in designated high-capacity areas).
- 2) Better align development and design review processes, to reduce delays and cost increases to projects, impacting both availability and affordability,
- 3) Allow the type of review to be appropriate for the size of the project, with clear and objective standards that builders can meet, and
- 4) Consider where, outside the Central City, the d-overlay may not be appropriate, and weigh its application carefully with potential impact on affordability. **In particular, consider allowing non-profit developers and/or affordable housing projects to meet a different set of clearly defined standards.**

Code states that higher-level plan district entitlements supersede regulations in overlay zones, base zones, and other regulations (PCC 33.700.070.E.1.a).

We also encourage the City to consider that any limitations on entitlements, and therefore on new housing will, **by virtue of the recently adopted Inclusionary Housing program, also result in a potential loss of permanently-affordable housing in our most well-connected, amenity-rich areas.**

The Planning & Sustainability Commission's recommendations include two that we'd like to reiterate here: 1) Improvements to public involvement processes focused on inclusion, especially of renters, and 2) Differentiating between more intensive Central City subdistricts, and less intensive subdistricts to reflect the unique character of different neighborhoods.

Lastly, we encourage the City to always consider the d-overlay, and indeed any project, in light of its stated long-range planning goals, namely the Climate Action Plan and the Comprehensive Plan's Equity and Anti-Displacement goals:

As Dan Bertolet put it earlier this week, "[The] benefits of compact communities... are ubiquitous in the past three decades' research on cities. Indeed, the main lesson of that entire body of work is that compact, transit-rich, walkable, mixed-use, mixed-income cities are critical ingredients to a sustainable future. Seattle officials shouldn't have to prove this anymore than they have to prove that hydro- and wind-powered Seattle City Light electricity is better for the planet than the coal power that many rust belt cities rely on."¹

Portland for Everyone will consistently encourage the Portland City Council to make inclusive and equitable policy and funding decisions to:

- Provide plenty of affordable and diverse housing types in all Portland neighborhoods
- Prioritize housing for historically and currently under-served populations
- Prioritize housing for humans over housing for cars
- Allow more people to live in areas with good access to transportation, parks, and services
- Create and maintain economically diverse neighborhoods

We look forward to continuing to follow the DOZA report and project through it's completion & implementation.

Sincerely,



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¹ <http://www.sightline.org/2017/04/20/not-in-your-backyard-cottages-in-law-apartments-and-the-predatory-delay-of-halas-adu-rules/>