



March 16, 2025

Oregon State Legislature
Committee on Housing and Development
900 Court Street NE
Salem, OR 97301

Housing & Development Committee Members:

On behalf of the Architectural Heritage Center & Bosco-Milligan Foundation, I am writing to **strongly oppose the removal of Design Review as proposed in the SB 974 –1 Amendment, specifically “Section 12 (5)” on page 10 and “Section 13 (5)” on page 11.**

As the Executive Director of AHC-BMF, as well as a professional land use planner and urban designer for over 25-years, I am deeply concerned this proposed change threatens the integrity of city planning and design protocols that are essential for ensuring quality architecture, making good housing and sustainable, thriving communities.

Removing Design Review takes us backward not forward. Looking to the past, we have many housing and development projects that reflect poor examples in city building (e.g. in the 1960’s-70s and in the last ten years many large projects that have not had Design Review). These tend to be quickly built, poorly constructed, and of low-quality and durability. Unfortunately, policies like the one proposed in SB 974 would strip away the necessary design process that ensures buildings are not only functional but also contextual and built with care. While downtown Portland has Design Review, very few areas in Portland have Design Commission Review under 65’ tall. Many areas need additional design tools, not less. Removing Design Review encourages a return to a past we don’t wish to repeat, where bad design undermines the very fabric of our neighborhoods.

Design review is essential for maintaining both quality and affordability. Quality development does not need to be expensive, but it does require far more evaluation than simply focusing on speed, cost-cutting, and expediency. Good design matters deeply—building form, relating to context, use of durable and low-maintenance materials, energy efficiency, and access to light and air are all critical ingredients in making buildings both affordable, long-lasting, and livable for all incomes. When buildings are well-designed, they can actually be more cost-efficient. However, faddish designs often add unnecessary cost due to extraneous materials and in-efficient construction practices. Many new buildings without design review exhibit low-quality construction that adds greater maintenance and repair requirements shortening the lifespan of housing. When new housing is poorly designed, it becomes unnecessarily expensive, less livable, and ultimately less sustainable.

We can learn much about durable and efficient housing from existing buildings: Many of our most beloved historic multi-family buildings are examples of cost-efficient, well-designed housing that have stood the test of time. These buildings often model construction methods of durable materials, stacked floor plates, simple and replicable window systems, and the cost savings from good design leaves room in the budget for craftsmanship and quality. These historic multi-family buildings are often unnoticed “hidden density” in plain sight because they are so well-designed we often don’t notice them as dense. These can inspire today’s multi-family housing builders.

Design Review has a proven track record in Portland and should not be eliminated. In 2021, Portland underwent a comprehensive overhaul of the Design Review process (DOZA), investing significant resources to streamline it while ensuring predictability and efficiency for developers. Importantly, Design Review in Portland applies only to a small percentage of the city and does not affect small residential developments, meaning the impact is minimal on broader housing goals. The process has always been about ensuring that higher-density housing respects the context of the surrounding neighborhoods and contributes positively to the community.

Design is the secret ingredient in making good housing and in achieving better density and infill development. Many people mistakenly focus on the word density when design is what really matters. Planners understand that density is a vague metric that does little to describe whether a building is good, the size, shape, height, arrangement, form of it, how well-tuned a building is for those that need low-income housing, and much more. Design impacts physical health and psychological well-being positively or negatively - it is not simply a numbers game, it is an art and science requiring careful attention.

Design Review is a value-added tool that supports not just good individual buildings but great cities. To quote Portland developer Kevin Cavenaugh, *"I like going to Design Review because it makes my buildings better."*

Design matters in sustaining economic investment, tourism interest, and vitality of small business districts. Quality architecture has contributed to Portland's reputation as a beautiful, well-designed, world-class city. It has played a crucial role in Portland's urban renewal and continued recovery. When we build with care we attract investment, draw new businesses and residents, yet when done carelessly can lead to urban blight and economic decline. Removing Design Review from the development process would undo much of the hard work that has contributed to Portland's success in the past, and threaten the very principles that make our state and city great places to live.

For all of these reasons, I urge you to **reject the proposal to remove Design Review from SB 974-1**. This change would be a significant overreach, removing critical tools that cities need to guide thoughtful, sustainable development. I strongly urge you to protect the integrity of urban planning processes and ensure that housing is designed to be both functional and integrated with its community.

Thank you for your time and consideration.

Sincerely,

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