

From: Elizabeth Morrow-McKenzie
To: [Council Clerk – Testimony](#); [Commissioner Fish](#); [Hales, Mayor](#); [Commissioner Saltzman](#); [Commissioner Fritz](#); [Commissioner Novick](#)
Subject: RIP Overlay Zoning
Date: Monday, November 21, 2016 3:27:08 PM

Dear Representative,

I live in and love my Laurelhurst neighborhood. But the residents alone are not the only Portlanders that enjoy the architecture of our highly accessible, historic neighborhood. People walk, bike and run past my house daily that are not residents. Sometimes they take photos of the details on my house. For years, my husband and I were those people when we were renting and then renovating a bungalow in the deep east side.

For the benefit of our city, I strongly encourage you to **negate the Residential Infill Project (RIP) "Overlay" proposals** to increase housing density.

We appreciate being able to say hello to our *close-enough neighbors* although *we are at capacity for shared-street parking and noise pollution*.

RIP would negatively impact our neighborhood, allowing for multiplex dwellings (up to 4 lots) in the current, primarily single-family home neighborhood.

Portland voters passed measure 26-179, allotting \$258.4 million dollars as a housing subsidy.

Do not allow greed to double and triple the families/unit in our neighborhood.

Do not support RIP OVERLAY ZONING.

This is not how we move forward. Allow the market to catch up, do not overbuild and destroy beautiful neighborhoods.

Steps are already being taken to meet the demand such as ADUs.

RIP OVERLAY ZONING is the wrong direction.

Best,
Elizabeth Morrow-McKenzie

From: Angela Squires Root
To: [Council Clerk – Testimony](#)
Subject: "Residential Infill Project Testimony" A.M. Squires, 3009 SE Rex Street, Pdx 97202
Date: Monday, November 21, 2016 3:25:14 PM

To whom it may concern,

I oppose the residential infill project. I oppose the demolition of houses in good condition. I oppose the rezoning of the majority of Eastside Portland neighborhoods to create higher density housing. The push toward higher density housing has only exacerbated the problem of housing unaffordability. I oppose the use of "ghost lines" in order to divide lots.

Thank you,
Angela Squires

Sent from my iPad

From: Joe Wilson
To: [Council Clerk – Testimony](#)
Subject: Residential Infill Project Testimony
Date: Monday, November 21, 2016 2:40:08 PM

Hello,

I would like to offer my full support for the plan, as it is currently proposed. I am especially encouraged by the legalization and encouragement of internal divisions of existing structures, and cottage clusters. Beyond the scope of the RIP, I would like to see all types of older, traditional housing such as courtyard apartments, bungalow courts, and fourplexes/multiplexes (commonly called "middle housing") legalized and encouraged in the comprehensive plan and in zoning.

I support the revision of parking rules for houses on narrow lots, off street parking should not be required as it increased the costs of housing. Maintaining a continuous curb is desirable as well.

I would like to see more of SW Portland included in this plan, as the responsibility of absorbing responsible growth is something that all of Portland's neighborhoods must shoulder. Do not allow more affluent areas of the city currently included in the plan (Alameda, Eastmoreland, NW Hills) to exempt themselves from it, again because of the shared responsibility that the entire city has to help absorb growth. This plan is an excellent start (assuming middle housing is fully legalized and enshrined in Comp Plan and zoning) for these neighborhoods to add housing without sacrificing the aesthetics which have made these areas more desirable.

Please formally adopt the Residential Infill Plan, and let it be a first of many re-examinations of how we can adapt our policies to fit with our desires and needs.

Thank you,

Joe Wilson
3125 SE Sherrett St
Portland OR 97222

From: Emily Kurzweil
To: [Council Clerk – Testimony](#)
Subject: RIP Opposition
Date: Monday, November 21, 2016 2:36:12 PM

Dear Representative,

As a voting resident from Inner NE, I strongly encourage you to **negate the Residential Infill Project (RIP) "Overlay" proposals** to increase housing density.

We moved to this neighborhood to enjoy the architecture and structure that is currently established.

We appreciate being able to say hello to our *close-enough neighbors* although *we are at capacity for shared-street parking and noise pollution*.

RIP would negatively impact our neighborhood, allowing for multiplex dwellings (up to 4 lots) in the current, primarily single-family home neighborhood.

Portland voters passed measure 26-179, allotting \$258.4 million dollars as a housing subsidy.

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Steps are already being taken to meet the demand such as ADUs.

RIP OVERLAY ZONING is the wrong direction.

Sincerely,

Emily Kurzweil
427 NE Laurelhurst Pl
Portland, OR 97232

From: REEN LAWSON
To: [Council Clerk – Testimony](#)
Subject: RIP Concept Report opinion
Date: Monday, November 21, 2016 2:20:55 PM

I am a native Portlander. Lived here (with the exception of a few years in Eugene) all of my 56 years, 43 years in the same neighborhood. My husband represents the same, small demographic - 56 years as a Portland resident, same neighborhood.

Portland needs smaller home options, mostly so they can be afforded. We have two adult children that cannot afford rent anywhere in the area, even with 3-4 room mates. I hear this same scenario from many friends and acquaintances.

Therefore, *limiting size and adding height restrictions* is important to us, IF we have to suffer “infill” at all. My personal opinion is that the City of Portland should encourage the moderate remodel of smaller homes in all neighborhoods. Create a system whereby local builders and remodelers easily get contracts to do such remodels via modest materials, fixtures and landscaping while still building quality structures that young families and 20-30-somethings can afford to buy. We don't need more McMansions.

I would be more than happy to discuss this idea further as a viable option for Portland.
Thanks, --Maureen Berrie-Lawson, Hayhurst/Vermont Hills/Gabriel Park

Sent from Windows Mail

From: Rebecah Schwartz
To: [Council Clerk – Testimony](#)
Subject: Do not support RIP Overlay zoning
Date: Monday, November 21, 2016 2:19:25 PM

Dear Representative,

As a voting resident from Inner NE, I strongly encourage you to **negate the Residential Infill Project (RIP) "Overlay" proposals** to increase housing density.

We moved to this neighborhood to enjoy the architecture and structure that is currently established.

We appreciate being able to say hello to our *close-enough neighbors* although *we are at capacity for shared-street parking and noise pollution*.

RIP would negatively impact our neighborhood, allowing for multiplex dwellings (up to 4 lots) in the current, primarily single-family home neighborhood.

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This is not how we move forward. Allow the market to catch up, do not overbuild and destroy beautiful neighborhoods.

Steps are already being taken to meet the demand such as ADUs.

RIP OVERLAY ZONING is the wrong direction.

Sincerely,
Rebecah Schwartz
931 NE Cesar E Chavez Blvd
Portland, OR 97232

From: Mitch Huff
To: [Council Clerk – Testimony](#)
Subject: Residential Infill Project Testimony
Date: Monday, November 21, 2016 2:17:40 PM

I encourage the city to adopt the proposals from the residential infill project. We need to make this city more affordable by encouraging development of more housing, denser neighborhoods, and more modest homes.

We must take care of the middle class by making home ownership and rent affordable. The best way to do that is to increase the supply of housing in a way that makes neighborhoods just as or more desirable. The residential infill project will accomplish that.

In a few months, my wife and I will have a child. I don't know if my child will be able to afford to live in my neighborhood when she grows up. But if we build smaller houses, more apartment buildings, and invest in our city as it grows with more services and amenities, then I can be confident my neighborhood will be a livable place for many people. The city will change, whether people like it or not. Let's try to help it change in ways that allow people to continue living here. Maybe people will have smaller houses and more neighbors, but they'll still be here, living in a strong community.

Mitchell HuffMenne
7135 N Denver Ave
Portland, OR, 97217

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Co-founder and lead developer, [AGILIST.IO](http://agilist.io) - Tools for the modern, agile software development team.
<http://agilist.io>

From: Laura Prendiville
To: [Council Clerk – Testimony](#)
Subject: RIP Proposal
Date: Monday, November 21, 2016 2:08:14 PM

To Whom It May Concern,

My husband and I have lived in the South Burlingame neighborhood since 1987, almost thirty years. We are deeply concerned about the proposed zone changes that are before The City.

South Burlingame is a middle income hard working neighborhood where neighbors know each other and are bonded to each other. The very fabric of this neighborhood cannot withstand a doubling, much less a tripling in size - brought on by the proposed changes. The roads are single lane, and the "no on-site parking" allowance in the proposal would cause terrible traffic and parking issues for the entire neighborhood and beyond. It is unreasonable to think that families will not need multiple parking spaces along the roadsides. The neighborhood would quickly be ruined and permanently so. Please do everything in your power to take care of the little guys this time and vote to kill the Proposal to Re-Zone (and ruin) Portland.

Sincerely,
John and Laura Prendiville
8310 SW 11th Ave.
Portland, Or 97219

From: Saskia Comess
To: [Council Clerk – Testimony](#)
Subject: Residential Infill Project Testimony
Date: Monday, November 21, 2016 1:49:27 PM

Greetings!

I live with my parents in the Laurelhurst neighborhood. Our address is 3641 NE Couch Street. I am 21 years old and I am a full-time student. I am writing in opposition to the RIP.

I have the following objections to the plan:

- 1) Ecological effects of new construction are significant. Construction-related pollution is a major contributor to unhealthy air quality and has recently been identified as a prime component of air pollution in cities with new construction activity (e.g., Delhi, India)
- 2) Added vehicular traffic will interfere with bike transportation. There is no proof that the majority of residents will eschew cars in favor of bikes or public transportation. In fact, automobile sales are increasing due to lowered gasoline prices
- 3) Significant population increases/density on existing infrastructure have not been adequately factored into the plan. Laurelhurst's century-old sewer system being a case in point.
- 4) New, younger residents - many with children, since this seems to be the RIP targeted demographic - will overcrowd our already overcrowded schools. RIP has not addressed sources of funding for new buildings and teacher recruitment/retention.
- 5) New buildings will be built along existing transportation corridors. Once that happens, these streets will no longer be widened/expanded without demolishing the new buildings. Given increased population density (many residents - if not most - can be assumed to have one or more motor vehicles), how will that be accomplished in a cost-effective fashion?
- 6) Construction of new and "non-conforming" homes and multi-family dwellings will likely have an adverse impact on property values of existing single-family homes. If that happens, how will the tax revenue shortfall be addressed?
- 7) RIP claimed to address the "missing middle" in housing. Yet, developers are now claiming that subsidies for "accessible" homes are insufficient to justify their construction. They are also claiming that building size as envisioned in RIP will be inadequate for their purposes and need to be increased. How will RIP assure "missing middle" homeowners that new housing will be made accessible to them, especially given the rise in mortgage interest rates?

These are only a few of the unaddressed issues attendant upon RIP. This proposal has been inadequately scoped and precipitously adopted. I strenuously object to RIP as written.

Sincerely,
Saskia Comess

From: Amie Davis
To: [Council Clerk – Testimony](#)
Subject: RIPSAC testimony
Date: Monday, November 21, 2016 1:38:08 PM

Dear Council Members,

I agree with the testimony of Dr. Loren Lutzenhiser, Professor Emeritus at PSU.

I am imploring you to please consider the impact that the RIPSAC proposal will have on our inner Portland neighborhoods. Areas of concern:

- **This proposal will lead to a massive increase in demolitions of affordable housing stock
- **The zoning changes will cater to single people and couples - pushing families out of our city neighborhoods and into the Suburbs.
- **The zoning changes will have the opposite affect by leading to more costly housing vs affordable housing
- **The zoning changes will be a disincentive for home ownership for the average middle class family and instead leave our neighborhoods vulnerable to out of state investors
- ** Sense of community and investment in our neighborhoods will be lost
- ** Demographic changes will lead to LESS diversity - catering only to young, healthy, white, wealthy and childless

Please consider the above impacts on our neighborhoods.

Please consider:

- * Disincentives for demolition
- * Incentives for internal conversion
- * Continue with the requirements of size limitations and set backs.
- * Our neighborhoods are already dense enough! Please concentrate density in areas where it is feasible to create new "20 minute" neighborhoods.

Sincerely,

Amie Davis
1732 SE 47th Ave.

Sent from my iPad

From: CdubD
To: [Council Clerk – Testimony](#)
Subject: Portland RIP testimony - 5324 N. Haight Ave. 97217
Date: Monday, November 21, 2016 1:33:29 PM

Hey There,

My name is Casen Davis and I own my home at 5324 N. Haight Ave. 97217.

I read the RIP concept report, and I really like all the recommendations in there. I recently purchased my house only to discover that there is a large development planned directly next door. After researching, I do think our cities regulations are quite excellent, but there is one thing that is not explicitly mentioned: sunlight.

The development next door is to the south, and it is positioned where all the afternoon sun falls. I would propose taking the position of the sun into consideration for regulations on building height. As I've not seen the plans for the development, I can't be sure what impact it may have, but I think it is likely a good idea that adjacent lots have buildings of comparable height.

I did have plans for putting solar in, but if this new building is too tall, it will block all light from our roof.

Thanks for the opportunity to provide some feedback!

Cheers,

Casen Davis
(714) 310-7557

From: Rick Meigs (Home)
To: [Council Clerk – Testimony](#)
Subject: Residential Infill Project Testimony
Date: Monday, November 21, 2016 1:30:31 PM

I strongly support the Residential Infill Project proposal.

We must grow the supply of affordable and diverse housing types in all Portland neighborhoods, create walkable neighborhoods, focus density where there is good access to transportation, parks, and services, and create and maintain culturally and economically diverse neighborhoods.

Rick Meigs
7032 SW 26th Avenue
Portland, OR, 97219

From: Alan Armstrong - Strongwork Architecture
To: [Council Clerk – Testimony](#)
Subject: Residential Infill Project Testimony
Date: Monday, November 21, 2016 1:28:14 PM

To Whom it May Concern,

I fully support any zoning changes that increase density in existing lower density zones. Specifically:

- Allowing (2) ADUs, one attached and one detached, in conjunction with a single family residence

- Allowing ADUs to be built in conjunction with duplexes and vice versa.

Thanks,

Alan Armstrong
3309 SE Sherrett ST Unit A
Portland, OR 97222
503-442-6786

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Alan Armstrong, AIA, CSBA
STRONGWORK ARCHITECTURE, LLC
t [503 442 6786](tel:5034426786)
www.strongworkarchitecture.com

From: Barb Millard
To: [Council Clerk – Testimony](#)
Subject: Residential Infill Project Testimony
Date: Monday, November 21, 2016 1:21:52 PM

Please do not allow 2 accessory dwelling units per property in single family zoned neighborhoods. This will ultimately lead to investors owning these multiplexes and further exacerbate the scarcity and expense for single family homes. Plus it will devastate those of us unfortunate enough to live next door to these new multi family residences which will be managed by property managers and absentee land lords. Investors already have many options in this city without pimping our neighborhoods out to them also.

Barbara Millard
4551 NE 47th ave
Portland, OR 97218

From: michael barley
To: [Council Clerk – Testimony](#)
Subject: RIP Concept Report Comment
Date: Monday, November 21, 2016 1:19:09 PM

Hello,

My name is Michael Barley. I live and own a home in St Johns and a concern I have has to do with the height of houses being built. Last year I invested in solar panels for my roof. The house directly south of me was bought by a developer two years ago. It's currently rented but I'm told his plan is to either remodel or demolish and build on the site. If he decides to split the lot into two for a couple of narrow houses or expands the size and builds multiple levels, it will affect my sun exposure and the effectiveness of my solar panels. I would like to see rules adopted that would take this issue into consideration when permits are issued for building or remodeling houses.

Thank you,
Michael Barley

www.barleybeads.com

From: Keith Comess
To: [Council Clerk – Testimony](#)
Subject: Residential Infill Project Testimony
Date: Monday, November 21, 2016 1:15:07 PM

Greetings!

We are homeowners in the Laurelhurst neighborhood. Our address is 3641 NE Couch Street. We are writing in opposition to the RIP.

In brief we have the following objections to the plan:

- 1) The impact of significant population increases/density on existing infrastructure has not been adequately factored into the plan. In many areas (Laurelhurst's century-old sewer system being a case in point).
- 2) Influx of new residents with children will overcrowd our already overcrowded schools. RIP has not addressed sources of funding for new buildings and teacher recruitment/retention.
- 3) Once new buildings have been built along existing transportation corridors, these can no longer be widened/expanded without demolishing the new buildings. Given increased population density (many residents - if not most - can be assumed to have one or more motor vehicles), how will that be accomplished in a cost-effective fashion?
- 4) Construction of new and "non-conforming" homes and multi-family dwellings will likely have an adverse impact on property values of existing single-family homes. If that happens, how will the tax revenue shortfall be addressed?
- 5) RIP claimed to address the "missing middle" in housing. Yet, developers are now claiming that subsidies for "accessible" homes are insufficient to justify their construction. They are also claiming that building size as envisioned in RIP will be inadequate for their purposes and need to be increased. How will RIP assure "missing middle" homeowners that new housing will be made accessible to them, especially given the rise in mortgage interest rates?

These are only a few of the unaddressed issues attendant upon RIP. This proposal has been inadequately scoped and precipitously adopted. We strenuously object to implementing it in its present form.

Keith Allen Comess, MD, FACC, FASE
 Frances Anne DeRook, MD, FACC

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<Thus the unfacts, did we possess them, are too imprecisely few to warrant our certitude...>
 -----> James Joyce,1939

For private communications, please use one of the following methods:

GPG key *NEW*: (<https://pgp.mit.edu/>) 4096R/0703B362 2016-03-11

fingerprint: 3FC1 5BA2 A126 FA73 5855 5133 54F5 323F 0703 B362

RetroShare key *NEW*: A8B6FFF7 (<https://pgp.mit.edu/>)

fingerprint: 2697 F439 ECE3 64DA 775B 42D3 F9DB 9EAE A8B6 FFF7

Adium fingerprint: 5D4EAED5 5817FE55 EE902717 55A41A7A E8AC4C8D

Signal/Redphone

fingerprint: 05 f8 de 6b fb 25 99 1d 46 cd 37 da 3d 8e ea ec 8c 36 65 ce 74 13 4b 64 e5 15 2e 00 13 dc 32 be 2f

<Keep a clean nose / Watch the plain clothes / You don't need a weatherman / To know which way the wind blows>

-----> *Bob Dylan, 1965*

<<----->>

From: Katie Koehler Reed
To: [Council Clerk – Testimony](#)
Subject: Residential Infill Project
Date: Monday, November 21, 2016 1:00:44 PM

I am opposed to the one size fits all nature of the Residential Infill Project as proposed.

I live in the Laurelhurst Neighborhood and bought in this area for it's very neighbor focused single family dwelling feel. We moved from Chicago where we chose to live in a densely populated urban neighborhood. Laurelhurst for us is the perfect urban setting with the comforts of knowing your neighbors and having room to move around you.

The historic feel of this neighborhood makes it such a special place that isn't found much anymore. I think it is important to use a scalpel not a hatchet with the infill project. Each neighborhood should be evaluated for what it offers and what it's resident's needs are. It would make more sense to make these zoning changes in areas where there is transit and merchants to support the growth while preserving the historic character of some of Portland's first neighborhoods.

Sincerely,
Katie Koehler Reed

From: Keith Comess
To: [Council Clerk – Testimony](#)
Subject: RIP comments: in opposition
Date: Monday, November 21, 2016 12:53:21 PM

Greetings!

We are homeowners in the Laurelhurst neighborhood. Our address is 3641 NE Couch Street. We are writing in opposition to the RIP.

In brief we have the following objections to the plan:

1) The impact of significant population increases/density on existing infrastructure has not been adequately factored into the plan. In many areas (Laurelhurst's century-old sewer system being a case in point).

2) Influx of new residents with children will overcrowd our already overcrowded schools. RIP has not addressed sources of funding for new buildings and teacher recruitment/retention.

3) Once new buildings have been built along existing transportation corridors, these can no longer be widened/expanded without demolishing the new buildings. Given increased population density (many residents - if not most - can be assumed to have one or more motor vehicles), how will that be accomplished in a cost-effective fashion?

4) Construction of new and "non-conforming" homes and multi-family dwellings will likely have an adverse impact on property values of existing single-family homes. If that happens, how will the tax revenue shortfall be addressed?

5) RIP claimed to address the "missing middle" in housing. Yet, developers are now claiming that subsidies for "accessible" homes are insufficient to justify their construction. They are also claiming that building size as envisioned in RIP will be inadequate for their purposes and need to be increased. How will RIP assure "missing middle" homeowners that new housing will be made accessible to them, especially given the rise in mortgage interest rates?

These are only a few of the unaddressed issues attendant upon RIP. This proposal has been inadequately scoped and precipitously adopted. We strenuously object to implementing it in its present form.

Keith Allen Comess, MD, FACC, FASE
Frances Anne DeRook, MD, FACC

From: Donald Winn
To: [Council Clerk – Testimony](#)
Subject: Infill housing
Date: Monday, November 21, 2016 12:37:28 PM

All new housing built after demolishing old housing should have off street parking of some form for every dwelling unit! I also feel that a home owner who wants to tear down his house should not be required to build more than one residence on his property. Marlene Winn, 5252 NE Multnomah St., Portland, OR 97213

Sent from my iPad

From: Dinah Davis
To: [Council Clerk – Testimony](#)
Subject: Residential Infill Project Testimony
Date: Monday, November 21, 2016 11:21:12 AM

The RIP, as it is currently planned is a terrible idea for the city of Portland and its historic neighborhoods. The infill would result in the destruction of our architectural history and destabilize our communities. Contrary to the essential idea of the RIP, the housing that will be built will NOT be affordable for lower-income families, and serve only to benefit the developers who seek to make millions while they destroy the property values where they build.

Stop the giveaway to a few moneyed interest groups!! If you give a damn about what makes Portland great, protect our history and our architecture and protect our families and our communities.

Please
Dinah Davis
wddavis@spiritone.com
503-803-2013
870 NE Laurelhurst Place
Portland, Oregon 97232

From: email
To: [Council Clerk – Testimony](#)
Subject: Residential Infill Project - Testimony from Resident
Date: Monday, November 21, 2016 11:10:21 AM

To the Portland City Council Members:

My name is Steve Cohen, I am a homeowner on the east side of Portland and have lived here for the past 23 years.

I have looked carefully at many of the materials provided and heard from both proponents and opponents.

I am STRONGLY OPPOSED to most of the zoning changes proposed as part of this project. It will certainly destroy much of the character and sense of community that has historically made Portland such a desirable place to live. It will certainly obliterate any distinction between neighborhoods and generally runs counter to the long term planning already in place for our region.

Also, I don't believe the increase in density or any of the proposals in this project will do anything to promote or provide for "affordable housing". It will only create smaller and more expensive housing for incoming residents who will later be dissatisfied with the degraded neighborhoods that they find themselves in.

Finally, it further encourages and entitles developers to accelerate the pace at which they are demolishing existing houses and replacing them with construction that is completely out of place with the neighborhoods into which they are dropped. It is clear from looking at this project that is developers and construction companies who solely benefit at the expense of both current and future residents of Portland.

To push forward with these zoning changes, essentially giving developers carte blanche to infill across much of Portland without regard to the interest and rights of the current property owners and residents would be a grave mistake and real disgrace.

Steve Cohen
4247 SE Pine Street
Portland, OR 97215

From: Lynn
To: [Council Clerk – Testimony](#)
Subject: Residential Infill Project Concept Report
Date: Monday, November 21, 2016 10:28:25 AM

Thanks to our great city for your vision and foresight in envisioning our future! As a graduate of Grant HS in 1972, I have enjoyed life in Portland for many years now. I appreciate so much our city's vision of an inclusive, adaptable city, ready to meet the many challenges our future will bring. (Climate change, increased density, economic divide...)

As supportive as I am of the goals of the residential infill project, I fear we are moving too quickly. Today's solutions quickly become tomorrow's problems. Chiefly, I am concerned that if all inner city neighborhoods become multi-family, money will once again leave the city for the "burbs". Who will choose to raise their children in a condo unit? Surely not people who have a choice. Children need places to play and to romp, and in spite of parks and green spaces, the city just won't have that available in the same way. Additionally, we had the privilege of raising our family on a block we've lived on for twenty years. We know all thirty three families on the block and our kids all grew up together. A real sense of community. How do you replace this when we are all multifamily?

Somehow, can there be a balance of multifamily and single family? How can we remain a family friendly city? How can we build community in new multifamily settings? And how can we keep money, people with choices, in a denser, noisier, less family friendly city?

Those are the questions that make me want us to slow down a bit and see if there is a third option that we are simply not thinking of now. And to be sure we are not setting ourselves up for a backlash exit from inner city sometime ten years from now...

Thank you all again for your time and service to our city.

Lynn Merrick
2216 SE 58th Ave
Portland, OR 97215

From: Sheila Baraga
To: [Council Clerk – Testimony](#)
Subject: "Residential Infill Project Testimony"
Date: Monday, November 21, 2016 10:10:27 AM

To whom it may concern,

Regarding the Proposed Residential Infill Project...my main concerns are three-fold:

1. That this proposal, as it stands, advocates for demolitions in R2.5 zones.
 2. This proposed project would automatically rezone all properties that contain historic 25' wide lots as R2.5.
- And finally, the fact that home demolition and reconstruction on a property creates 30xs the carbon emissions than remodeling of an existing residence.

So if for NO reason other than the Quality of Air that we will leave behind for our children...there is so much work to do before implementing this proposal. Please look at who we are trying to please with this Infill Project. Does it serve to create a beautiful, healthy, livable City? Does it allow our children the opportunity to stay in the town they were born in? Does it protect those that have history and lifetimes here? Or are our leaders (that were to put in positions of authority to protect us) acquiring to outside money, living out the short-sided get-rich-quick illusion that will ultimately be our undoing? Where are our visionaries? Please look at this Project closely before giving it the go ahead. This proposal, in "One Fell Swoop" could be the nail in the coffin of our liveability.

Thank you for your time and effort to keep Portland home.

Sheila Baraga
1400 se Oak Street
Portland, OR 97214
503.318.8338

From: [BPS Residential Infill](#)
To: [Madya](#); [BPS Residential Infill](#)
Cc: [Council Clerk – Testimony](#)
Subject: RE: [Approved Sender] Re: [User Approved] City of Portland Residential Infill Project
Date: Monday, November 21, 2016 9:49:48 AM

Hello madyapan@yahoo.com,

Thanks for your email. Would you like me to also include these follow up statements to Council Clerk as testimony to City Council on the Residential Infill Project?

If you have additional comments you would like included as part of City Council testimony on the Residential Infill Project, please email them to CCTestimony@portlandoregon.gov

Best,

Todd M. Borkowitz RLA, LEED AP | Urban Planner
 City of Portland Bureau of Planning and Sustainability
 P 503.823.5042 | C 503.467.6782
Todd.Borkowitz@portlandoregon.gov

The Bureau of Planning and Sustainability is committed to providing meaningful access. For accommodations, modifications, translation, interpretation or other services, please contact 503-823-7700 or use City TTY 503-823-6868, or Oregon Relay Service 711.

503-823-7700: Traducción o interpretación | Chuyển Ngữ hoặc Phiên Dịch | 翻译或传译 | Traducere sau Interpretare | Письменный или устный перевод | Письмовий або усний переклад | Turjumida ama Fasiraadda | 翻訳または通訳 | ການແປພາສາ ຫຼື ການອະທິບາຍ | التترجمة المحريرية للشؤون فهية | www.portlandoregon.gov/bps/71701

From: Madya [mailto:madyapan@yahoo.com]
Sent: Tuesday, November 15, 2016 7:17 PM
To: BPS Residential Infill <residential.infill@portlandoregon.gov>
Subject: [Approved Sender] Re: [User Approved] City of Portland Residential Infill Project

A quote from John F, Kennedy: Summing up his aspirations for the nation.

"I look forward," he said, "to a great future for America, a future in which our country will match its military strength with our moral strength, its wealth with our wisdom, its power with our purpose. I look forward to an America which will not be afraid of grace and beauty, which will protect the beauty of our natural environment, which will preserve the GREAT OLD AMERICAN HOUSES AND SQUARES AND PARKS OF OUR NATIONAL PAST, AND WHICH WILL BUILD HANDSOME AND BALANCED CITIES FOR OUR FUTURE.....

And I look forward to an America which commands respect throughout the world not only for its strength but for its civilization as well"

Stewart L. Udall asks; Is it too much to hope that the American people will take up this challenge, and help turn this vision of our martyred President into a reality?

Please use this to instill the wisdom in the City.
Thank you,
Madya

On Monday, November 14, 2016 9:24 PM, Madya <madyapan@yahoo.com> wrote:

It is an absolute crime that the City of Portland is destroying many historic neighborhoods, Especially, Laurelhurst.
This city is changing and not for the good.
Portland needs to be known for its Neighborhoods, not how much money Developers have made.
Look what has happened in the Northwest - it's all madness and chaos with all the huge condo's.
Traffic is horrific.
Along Williams and Vancouver has become so crowded and one lane streets - how insane is that.
New people moving in have homeless and druggies at their door steps.
We do not want a little New York here. This city has been loved for its great neighborhoods and now they will be gone. I'm ashamed of the leadership in this city.

On Monday, November 14, 2016 9:15 PM, Madya <madyapan@yahoo.com> wrote:

Yes, please.
Thank you for your concern.

On Monday, November 14, 2016 12:30 PM, BPS Residential Infill <residential.infill@portlandoregon.gov> wrote:

Hello madyapan@yahoo.com,

Thanks for your email. Would you like me to forward it to the Council Clerk as testimony to City Council on the Residential Infill Project?

Best,

Todd M. Borkowitz RLA, LEED AP | Urban Planner
City of Portland Bureau of Planning and Sustainability
P 503.823.5042 | C 503.467.6782
Todd.Borkowitz@portlandoregon.gov

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-----Original Message-----

From: madyapan@yahoo.com [mailto:madyapan@yahoo.com] On Behalf Of email@addthis.com

Sent: Wednesday, October 19, 2016 7:20 PM

To: BPS Residential Infill <residential.infill@portlandoregon.gov>

Subject: [User Approved] City of Portland Residential Infill Project

It is an absolute crime that the City of Portland is destroying many historic neighborhoods, Especially, Laurelhurst.

This city is changing and not for the good.

Look what has happened in the Northwest - it's all madness and chaos

<http://residentialinfill.participate.online/share-feedback#.WAgp6INDfcA.email>

This message was sent by madyapan@yahoo.com via <http://addthis.com>. Please note that AddThis does not verify email addresses.

From: Amanda Miller
To: [Council Clerk – Testimony](#)
Subject: Residential Infill Project Testimony
Date: Monday, November 21, 2016 9:09:00 AM

From: Amanda Lee Miller
1806 SE Taylor St.
Portland, OR 97214

I am in firm opposition to the current proposal & demand the city revisit the plan & come up with alternative solutions.

A one size fits all solution will not be sustainable for some Portland communities, like my own in Buckman. I oppose the scale of projects & lack of adequate parking/traffic flow planning that I currently experience & the proposal set forth continues to ignore scale of houses. This isn't just about loss of views but keeping the character of the neighborhood intact. Each neighborhood should have size & scope considerations. Our community is being bulldozed with infill currently negatively impacting our live-ability & traffic flow. For example, the two monster apartment buildings currently under construction on SE 12th & Belmont to SE Taylor do not address the number of cars or parking & that will directly impact people living close.

If this passes, will allow the single-family zoned property in Buckman to be changed to multifamily zoning without the legally required opportunity for the adequate and timely public review and comment in due process. Without the option for any changes to occur until 2035, this needs to be revised and allow for each community to identify what is best for their community.

Thank you for your consideration & responsiveness to our concerns.
Amanda Lee Miller
1806 SE Taylor St.
Portland, OR 97214

From: Cassie Skall
To: [Council Clerk – Testimony](#)
Subject: My support testimony
Date: Monday, November 21, 2016 7:35:18 AM

Please note my support of SMILEs position on this issue!

Residential Infill Project Testimony

by [Cstefanick](#) on [November 5, 2016](#) in [SMILE](#)

November 4, 2016

Residential Infill Project Testimony

1221 SW Fourth Ave. Room 130,

Portland, Oregon 97204

The Sellwood-Moreland Improvement League (SMILE) has carefully evaluated the Residential Infill Project (RIP) proposal and respectfully submits the following comments:

We value the character and livability of our neighborhood. We are concerned that this proposal, which could more than double the population of our neighborhood, would diminish the character and livability of our neighborhood. Our schools are overcrowded and enrollment is growing at an unsustainable rate. Many of our residential streets are narrow, and have commuter cut-through traffic that is at times unsafe for neighborhood children and elderly residents. Parking on both sides of the narrow streets prevents emergency response vehicles from entering the streets. Twenty years ago no one expected 4-6 story apartment buildings would be built in our neighborhood. Now we have over one thousand apartment units being built; from which we have learned that we must assume zoning changes will eventually result in construction of the maximum allowed density.

We also recognize that housing affordability is a major problem and that increasing density is inevitable. It should be done in a manner that preserves the character and livability of our neighborhood.

Housing choice proposals

We believe that there is insufficient justification for the proposed density increase. In order for SMILE to seriously consider accepting significantly more density, we must understand the potential impact on our neighborhood. The City's Growth Scenarios Report presents expected future housing demand, but that demand is not transferred to the neighborhood level. How many units of middle housing would be built in Sellwood-Moreland? Sellwood -Moreland presently has hundreds of 5000 square foot R2.5 lots on which duplexes could be built – how much middle housing can Sellwood-Moreland provide on these lots with present zoning? The planning that RIP has done is entirely supply based – allowing middle housing within ¼ mile of centers. Is that supply sufficient? If that supply is excessive, will a large fraction of middle housing come to our popular neighborhood rather than other neighborhoods? Will providing too much middle housing zoning now cause undesirable widespread conversion in years or decades later, similar to what is happening now in our commercial centers?

The City should consider the following principles when deciding how to change zoning to increase density:

1) Develop neighborhood scenarios for future housing demand. Consider the demand for housing created by population growth and the paradigm that more supply is needed to increase affordability. A simple scenario is to start with the Growth Scenarios Report estimate of 20,000 new households in Southeast Portland by 2035. Sellwood-Moreland has 8.1% of the land area of Southeast Portland. Therefore, if growth is uniformly distributed in Southeast, Sellwood-Moreland would grow by 1,620 households.

2) Estimate how much growth can be accommodated with existing zoning, property turnover, and construction rates in each neighborhood. This should be a holistic approach that considers commercial, accessory dwelling units (ADUs), and existing multifamily and single family zones. For example, there are at least about 1,233 units presently under development in our neighborhood, a 21% increase from the total number of units in 2014.

3) If additional density is needed, introduce it gradually. Establishing a minimum density for all residential zones, such as proposed for the R2.5 zone, is a way to increase density without increasing the maximum density that could be built. Phase in the additional density by allowing only one additional unit per lot and years later evaluate supply, demand, and infrastructure resilience before increasing density further.

We are pleased that the obvious loophole of allowing a bonus unit for building an accessible unit has been eliminated. While we support the new design control concept, details are lacking and neighborhood input will be essential. Height limits should be provided in feet, not stories which is ambiguous. We also suggest that you consider specifying a minimum unit

size to insure that some new units are large enough for families.

Scale of houses

SMILE strongly supports almost all of the proposals to limit the scale of houses. These include

- Maximum size depends on lot size
- Height measurement from lowest point, not highest
- Limit dormer projection.
- Increase minimum front setback 5 feet, except to match adjacent setbacks.
- Increase allowed side setback projections for bay windows and eaves

We have reviewed the square footage limits and estimate that about one-quarter of the homes built in our neighborhood since 2010 exceed 0.5:1 FAR, so the limits appear to preserve existing building scale and continue to allow most construction to take place.

The new proposal to set the Floor Area Ratio (FAR) of R2.5 properties to 0.7:1 concerns us because it would allow a 3,500 square foot house that would be oversized for our neighborhood to be built on R2.5 lots of about 5,000 sf which are common. Thus, the R2.5 zone would become the McMansion zone with 3,500 sf houses and, if 5,000 sf or larger, one Accessory Dwelling Unit (ADU). To prevent oversized houses on R2.5 lots, we urge you to add that the maximum FAR per unit should be 0.5:1.

Closing comments

In summary, we oppose the housing choice proposals because there is insufficient justification to tremendously increase the density of our neighborhood. A better approach would be for the City to downscale citywide estimates of growth to the neighborhood level so we can evaluate the impact growth will have on our neighborhood and estimate how much growth the neighborhood can accommodate. If density has to be increased, do so gradually and in a neighborhood-friendly manner. We support the housing scale proposals which would help ensure that future residential development preserves the character and livability of our neighborhood and believe that a floor area per unit cap is needed in R2.5 zones to prevent construction of oversized houses.

These comments were drafted by the SMILE Land Use Committee and approved by a vote of the SMILE Board of Directors October 19,

Sincerely submitted,

Cassie Skall, Homeowner
196 s.e. Spokane st. # 208
Portland OR

Intention Intention Intention

From: Elissa Newton
To: [Council Clerk – Testimony](#)
Subject: Written Testimony on Residential Infill Project Concept Report
Date: Monday, November 21, 2016 9:27:55 PM

Name: Elissa Newton
Address: 3144 NE 77th Ave; Portland, OR 97213

To Whom It May Concern,

I recently received this notification from my Next Door forum that the RIP Concept Report is open for public comment. This is the first I've heard of this initiative but the housing crisis is a very important issue to me (and my friends) so I wanted to take a moment to review the Summary.

It breaks my heart to see historic small bungalows torn down to the foundation and an ugly modern monstrosity rebuilt around the original slab. For contractors to call such actions a 'historic renovation' is insulting. I liked the concept of limiting the scale of houses. Smaller houses and more duplexes/multifamily dwellings makes a lot of sense to me. Can incentives be given for new construction properties with garages instead of forcing the tenants to park on the street?

In sum, I'm glad this issue is being discussed and the concerns of the citizens of Portland are being heard.

Thank you for the opportunity to comment,
Elissa Newton

----- Forwarded message -----

From: Nextdoor Roseway <reply@rs.email.nextdoor.com>
Date: Mon, Nov 21, 2016 at 1:01 PM
Subject: Deadline for written testimony on Residential Infill Project Concept Report extended to November 23
To: elissa.newton@gmail.com

  Communications Eden Dabbs,  City of Portland Bureau of Planning and Sustainability AGENCY

After hearing testimony about the RIP Concept Report from nearly 120 people on November 9 and 16, City Council closed oral testimony but extended the deadline for written testimony until November 23.

Testimony must be received by midnight on November 23 and must include your name and address and "Residential Infill Project Testimony" in your subject line.

You may send written comments ...

- Via U.S. Mail: 1221 SW Fourth Ave. Room 130, Portland, Oregon 97204



- Via email: CCTestimony@portlandoregon.gov

Note: Under the RIP recommendations, ... [Read more](#)

[Nov 21 in General to all areas in City of Portland Bureau of Planning and Sustainability](#)

[View or reply](#)

[Thank](#)

[Private message](#)

You can also reply to this email or use Nextdoor for [iPhone](#) or [Android](#)

This message is intended for elissa.newton@gmail.com.

Not interested in hearing from the City of Portland Bureau of Planning and Sustainability? [Adjust your email settings](#)

Nextdoor, 760 Market Street, Suite 300, San Francisco, CA 94102

From: Rowan Frost
To: [Council Clerk – Testimony](#)
Subject: Comment on RIP Concept Report
Date: Monday, November 21, 2016 9:38:02 PM

To Whom It Concerns:

We bought our home in the Richmond neighborhood near 34th & Division knowing that traffic, bicyclists, and noise from visiting pedestrians and businesses on Division would be part of our urban environment. Any negatives are offset by the beauty of the neighborhood. Walking past historic homes with well tended front yards and street trees is a joy. It is balanced by the density of residential and commercial development on Division.

Recommendation 1 of the concept report is not objectionable, although unnecessary.

Recommendations 2 & 3 would destroy the character of our neighborhood by encouraging property speculation and non-owner-occupied rentals. With no provisions for parking and no requirements to match the existing architecture, it is more than likely that profiteering developers will buy up existing homes, pay the token demolition fees, and put up as many units as cheaply as they can.

We already have an example of this on Division just east of 34th. A developer destroyed an old house, and for about 10 months has been building a monstrosity completely out of character with the houses on either side. The poor construction, the cheap materials, and the stupid and thoughtless design are examples of the kind of infill encouraged by the recommendations in the concept report.

We suggest the committee submit a work plan that allows for the addition of an internal ADU to existing structures without altering the current maximum structure size. This would create affordable rental properties without altering the existing character of neighborhoods. We also suggest that parking requirements remain part of new development to avoid burdening neighbors with the inevitable overflow.

Sincerely,

Cynthia Elliott & Rowan Frost
2324 SE 34th Ave.
Portland, OR 97214

From: Christine Colasurdo
To: [Council Clerk – Testimony](#)
Subject: Residential Infill Project: written testimony
Date: Monday, November 21, 2016 9:44:40 PM

Dear City of Portland:

I am writing to voice my strong opposition to residential infill. The assumption is that infill is good for wildlife. But what I have witnessed in terms of infill in my neighborhood is that mature trees are cut down, yards are eliminated, and any habitat for urban wildlife (such as birds, amphibians, insects, mammals) is destroyed. Yards are not just yards in the 21st century; they are the only place left for wild animals to find food and shelter in an urban environment. We have densified Portland to the point of it becoming a pavement desert for other species.

Infill also contributes to traffic congestion, air pollution, light pollution, noise pollution (aka, leaf blowers) and other stressors on land, air and water.

Most importantly, the City of Portland is being destroyed by a single developer, Vic Remmers, of Renaissance Homes. Mr. Remmers is NOT beautifying neighborhoods with his rampant development or helping to create affordable housing. His over-sized single-family balloon-houses are a blight. He is taking out historically-important houses (and trees) and erecting ugly structures in their place that will not be regarded in the future as anything historically important to save. We are losing historical treasures daily to architectural garbage.

As a native Portlander, I have had many conversations with other native Portlanders who grieve to witness the older trees, houses and historic structures in Portland being razed and destroyed for . . . what? For generic architecture that often does not address aspects of wildlife habitat and traffic congestion.

Finally, I want to sound the alarm for our urban tree canopy. Our older trees are succumbing to diseases such as Dutch Elm Disease and root rot (Port Orford cedars). Our state tree, the Douglas Fir, is developing problems with Swiss Needle Cast disease. All of our urban trees are stressed by drought and global-warming. And these are the same trees that actually help reduce global warming and clean our air. Infill is yet another problem for these trees.

If we take out our tall native conifers, we take out our native Douglas squirrels. If we dig out land for infill, we remove sites for western red-backed salamanders. You might consider that extreme thinking, but I've got western red-backed salamanders in my back yard. What if I decided to divide my lot and build a house there?

PLEASE THINK TWICE ABOUT MORE CONSTRUCTION. Growth might be inevitable, yes, but it needs to be smart growth. What I am so dismayed to see in Portland is a lot of dumb growth. Portland as a "green" city is a myth when it comes to new construction, especially residential construction.

Thank you for your consideration.

Sincerely
Christine Colasurdo
2776 SW Old Orchard Road
Portland, OR 97201
(503) 477-7978

From: Courtney Woodside
To: [Council Clerk – Testimony](#)
Subject: RIP Proposal
Date: Monday, November 21, 2016 9:56:01 PM

Dear RIPSAC committee members and City Council,

The current proposal does not reflect the goal of the RIP, as stated in the original description:
*“The Residential Infill Project will address the scale, size, mass and location of new single-family construction to **help protect the unique character of Portland’s treasured neighborhoods**. But it will also look at smaller forms of housing (skinny houses, stacked flats, cottages, etc.) to ensure that **where they are allowed**, these more affordable forms of housing reflect the desired character of the single-dwelling zones.”*

The proposal will erode the character in of neighborhoods, allowing houses and duplexes much larger than current houses. This is the opposite of the goal RIP.

Demolition of houses will increase with this proposal. This will result in loss of neighborhoods and the loss of affordable housing.

Instead of providing more affordable housing, the new housing stock being built after demolition is more expensive than the surrounding houses and the house which was replaced. I have seen this take occur in my own neighborhood as well as around the City.

The overlay zone along Barbur Blvd disregards reality. Interstate 5 parallels Barbur Blvd and in many places prevents easy access from the surrounding neighborhood to Barbur. In Southwest Burlingame neighborhood, the overlay zone includes streets which are 12 transit blocks or more from Barbur (ie. travel distance via road) although on the map the streets appear adjacent to Barbur. In addition, many of these streets are narrow, one-lane roads with limited access and no sidewalks. Some are even unimproved, gravel roads. It makes NO sense to increase the density in such an area by including them in the overlay.

If proximity to transit lines is to be used as a criteria for rezoning in Southwest Portland, then the areas for rezoning need to match the reality of infrastructure, and not be simply a line drawn on the map.

My understanding is that there is an alternative proposal put forth by some RIPSAC members which allows for increased density in appropriate areas while maintaining and respecting the character of existing neighborhoods.

I would support that proposal if it met these goals:

- 1.) ADU's. We encourage the building of external and internal ADUs to provide more housing options. The city should find ways to encourage conversions instead of demolitions of existing affordable houses.
- 2.) Code that ensures scale of housing fits neighborhood context and protects solar access and privacy. The vast majority of our neighborhood is single story or single story with dormer, with twenty plus feet setbacks being common. The only houses that are common to the proposed two plus story buildings with 15 foot setbacks are the new infill homes.
- 3.) Promote ways to save viable housing when possible.
- 4.) Provide clear codes that avoid inconsistent and confusing criteria such as density or overlays.
- 5.) Direct density around centers consistent with the Comprehensive Plan to create walking scale neighborhoods and encourage transit and reduce auto use.
- 6.) Evaluate and make changes in higher density areas to find out why existing regulations are not working, and re-zone where appropriate.

My highest concerns is the city is taking a “one size fits all” to the application of the overlay zone. My neighborhood, like many in the southwest, does not have many of the amenities needed to support

density. This includes basic infrastructure like sidewalks on collectors or storm drainage. Streets in the proposed overlay zone are not easily accessed and are removed from amenities such as public transportation, businesses and connecting roads.

I am also very concerned about the lack of respect for current home owners and disregard for maintaining neighborhood character. The proposed size of the houses is out of scale and will overcrowd the existing homes without providing affordable housing.

Thank you

Courtney Woodside

8405 SW 11th Ave

From: Steven van Asselt
To: [Council Clerk – Testimony](#); [Commissioner Fish](#); [Hales, Mayor](#); [Commissioner Saltzman](#); [Commissioner Fritz](#); [Commissioner Novick](#)
Subject: A "no" vote on RIP
Date: Monday, November 21, 2016 10:08:44 PM

Dear Council members,

This won't be lengthy because all the arguments against RIP have been addressed thoroughly. I wish to add my voice to others that disagree with this initiative. So much of the character and desirability of Portland is at stake with this proposal and it feels like so little is to gained in its adoption.

Please don't vote in favor of RIP, it will be a legacy I truly believe you will come to regret.

Sincerely,

Steven van Asselt

From: Kolasky Betsy
To: [Council Clerk – Testimony](#)
Subject: ReZoning in historic districts
Date: Monday, November 21, 2016 10:40:26 PM

To City Council,

Please, please, please maintain the current prohibitions against rezoning and infill projects in the historic districts. Developers have all the leeway they need to do decent projects in the districts right now. Loosening restrictions will simply destroy the historic districts without providing benefit to anybody but developers. Portland deserves better than that.

If you want to see what unrestricted development does to neighborhoods, take a walk along the streets bordering Division in the 30's: apartments without adequate offstreet parking have destroyed those neighborhoods and created a congestion on division which in fact isn't good for business. It's just too much of a pain to find parking.

Thank you in advance for acting in our citizens', and our city's, interests.

Elizabeth Kolasky
2110 SE Tamarack Ave
Portland 97214

Sent from my iPhone

From: beemshake@gmail.com
To: [Council Clerk – Testimony](#)
Subject: Residential Infill Project Testimony
Date: Monday, November 21, 2016 11:19:50 PM

To Whom It May Concern:

Portland needs more affordable housing, but RIP will not accomplish that. What RIP will accomplish is more developers knocking down existing housing to build possibly more densely, but not more affordably. I've already seen this in my neighborhood in Laurelhurst, where a house around the corner from mine (on NE Cesar Chavez & NE Couch) was purchased for \$600K, demolished, and replaced by 2 much larger homes that each sold for more than \$900K. Increased density yes, but not increased livability. Big developer profit is not something the city should be in the business of encouraging, especially when it comes at the cost of our amazing existing neighborhoods.

Let's help make Portland more affordable the right way. Continue to build densely along commercial corridors, and increase the number of affordable units required. Streamline (or waive) the permitting process for people to build ADUs or convert to a duplex, but only when demolition is not involved.

thanks,
beeman

Maria Thi Mai 503.539.4966 3637 SW Canby St, Portland, OR 97219 Thimai.maria@gmail.com

November 11, 2016

Council Clerk 
City Hall 1221 SW 4th Avenue
Portland, OR 97204

AUDITOR 11/21/16 AM11:02

Maria Thi Mai Testimony on Residential Infill Project

I am writing to address issues I spoke about 20 years ago when the Southwest Portland Comprehensive Plan was originally drafted. My intent is to ensure this round of planning incorporates the geomorphology of the landscape and sustains existing or increases pervious surface areas.

The goals are to:

Reduce the impact on Portland's sewer system and thereby limiting infrastructure costs;

Sustain and increase open space for urban wildlife habitat, large trees, and yards large enough to plant a garden, play space for children, and enjoy being outdoors;

Create a 1:3 structure size to open space construction model. In other words, the size of the structure would be 1/3 the size of the lot and thereby increase pervious surface areas;

Provide incentives such as tax abatements and reduced System Development Charges (SDC's), to developers who employ the 1:3 model;

Reward residents that currently live on a 1:3 lot and residents who purchase a home that apply the 1:3 model with an incentive similar to the stormwater discount program; and

Adopt a lifestyle ordinance of "living simply means living small" to reinforce the City's commitment and values.

During the November 9th hearing many people testified preferences of housing types, sizes, and characteristics. What we didn't hear much about was the fact that most proposed housing types increase impervious surface areas and costs to the City's sewer system.

The planning report needs to address the footprint of the structure relative to lot size and maximize pervious surface areas. This is especially relevant throughout southwest Portland where the terrain is hilly and subject to landslides. Early developers knew this to be true. Southwest Portland was platted on half-acre lots with run-off and septic systems in mind. Furthermore, in the 1940's, the City of Portland purchased 90-acres from developers who knew the high water table would create foundation and drainage problems to construction. Gabriel Park today is an incredible asset to all of Portlanders. We can be grateful that it didn't become flooded with houses. Pun intended.

In the past 3 years, 700 of mostly small bungalows have been gobbled up by developers and replaced with McMansions, duplexes, and apartments that maximize the buildable footprint and increase impervious surface areas. I get it. In order to pencil out and maximize profits, trees need to be mowed down to build-out to the lot line limit. This paradigm needs to change.

I implore you to re-imagine what's possible. Do the right thing and make wise decisions that preserve open space, pervious surfaces, urban wildlife habitat, trees, and small bungalows.

Sincerely,


Maria Thi Mai

PORTLAND OR 970
17 NOV 2016 PM 2 L



37252

Council Clerk
City Hall
1221 SW 4th Ave
Portland, OR
97204

97204-190021





Maria Thi Mai
3637 SW Canby St
Portland, OR 97219

Brian Allen
Windermere Stellar
733 NW 20th Ave.
Portland, Oregon 97201

Date: November 17, 2016
To: Portland City Council
From: Brian Allen
Subject: Residential Infill Project

My name is Brian Allen. I am a longtime Portland resident and business owner. I am the President of the Windermere Stellar real estate brokerage.

First, thank you all for investing your time to listen to citizen input on this important topic. I tried to testify in person November 16th, but the time allotted ran out before I was able to have that opportunity.

My colleagues and I provide services to on average about 5,000 people each year helping them sell their homes and/or buy new ones. Typically, a homebuyer will begin by telling us how many bedrooms and bathrooms they want in their next home. In reality, bedrooms and bathrooms are not their most important criteria. If they were, our job would take minutes rather than months. What people really buy is a home in a neighborhood. The neighborhood is often the most important element.

My concern is for preserving the high quality and desirability of Portland's neighborhoods. The quality of Portland neighborhoods is unique compared to other cities. Our in-city neighborhoods are thriving. Unfortunately, I believe this plan as proposed could have significant unintended negative consequences.

Too much density and too many cars parked on the streets of our neighborhoods jeopardize the quality of life in these neighborhoods.

Allowing residential construction without off street parking doesn't solve the automobile or carbon footprint problem. It only increases the number of cars parked on the streets in our neighborhoods. The only way to truly achieve a society less dependent on cars is to build out the necessary infrastructure. You could also have homeowners and tenants living in dwellings without parking to agree to not own a car. But, I don't think that's likely to

happen. Choosing to eliminate off street parking just exacerbates the problem. People need their cars for their children, to go grocery shopping, to visit other neighborhoods, pick up family members and a myriad of other uses.

One objective I keep hearing for The Residential Infill Project is that it will improve Portland's housing affordability problem. I do not believe the plan as proposed will achieve the goal of delivering more affordable housing.

The suggestion is that if we create more supply via this zoning change, we can bring the supply-demand ratio into better balance and thereby reduce the cost of housing. Yes, supply and demand plays a significant role in market cost but it does so as only one part of a larger formula.

The cost of housing is influenced most of all by two things, the overall economy and the property's location.

First consider the influence of the economy: Imagine a home in the SE Division neighborhood that was valued at \$350,000 in 2007. The home lost about 30% of its value during the recession, dropping its value to about \$245,000. Today, that home is worth about 8% higher than peak value, which is \$378,000. Those dramatic swings in value had nothing to do with zoning. They had everything to do with the economy.

The other major economic influence on affordability is mortgage rates. In 2007 the average interest rate on a conventional loan was 6.5%. In 2016 the average rate has been 3.5%. That reduction in interest rate results in over a 45% reduction in the cost of owning that home. Again, it has nothing to do with zoning.

Next consider the influence of location: Imagine if you could wave a magic wand and move that \$350,000 home from the SE Division neighborhood and place it up on Alameda ridge, or in Portland Heights, or out in the Cully neighborhood. That very same home would have a dramatically different value depending on which neighborhood it was located. My point here is that if the changes in the Residential Infill Project allowed for more units to be built in high demand, higher priced, neighborhoods the price for those additional units would be too high to be considered "affordable." They will sell for, or rent for, the highest price the market will bear and modestly increasing supply will have little impact.

The City of Portland and the Metro Council have other options to help with the housing affordability challenge. We could build affordable housing on unused city owned land. We could expand the Urban Growth Boundary in a conscious and purposeful manner. We could reduce real estate taxes. We could invest money in education and retraining our unemployed and underemployed workers.

I am all in favor of allowing and encouraging ADU's that fit into the scale and scope of the surrounding neighborhood. ADU's should be added to existing homes of the scale and size, including their lots, which can accommodate more than one family. And adding 3 ADU's on smaller lots (i.e. 4000-7000) is a poor idea.

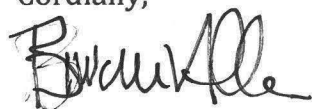
I do believe that increased density is needed but should be limited to the areas adjacent to and/or very near major arterials and highly developed public transportation infrastructure.

The plan as proposed increases density far too deeply into neighborhoods throughout the city and runs the risk of damaging the desirability of Portland's in-city neighborhoods. The ultimate unintended impact of increasing neighborhood density will be reducing neighborhood desirability and harming Portland's economy by making the city feel less livable.

I recommend that you do not pass this plan but send it back to the committee and to the neighborhood associations and groups for further study and comments. The neighborhoods are actively organized and are fully capable of adding ideas and input that will make the plan work better for each neighborhood. I also recommend you enlarge the RIPSAC committee to include more neighborhood association and business leaders who do not come from the development community.

I applaud the city trying to come up with a viable plan for the next 20 years but this plan needs a lot more work before it is sent to the planning department for proposed implementation.

Cordially,

A handwritten signature in black ink, appearing to read "Brian Allen". The signature is stylized and cursive.

Brian Allen



November 21, 2016

Portland City Council
1221 SW Fourth Ave. Room 130,
Portland, Oregon 97204

City Council,

This letter is to voice our concerns and opposition to the current Residential Infill Project (RIP) proposal. Over a year ago the South Burlingame Neighborhood Association passed a motion to support the United Neighborhoods for Reform resolution being presented to council regarding the house demolitions. The Mayor's creation of the RIP gave us hope that our voices might be heard and slow the demolition of our modest homes. Our members support finding mindful ways to provide additional and flexible housing, while minimizing demolitions and respecting neighborhood character, and we understand that you are under pressure to address the housing demands of our new citizens.

The original RIP description in the Call for advisor's stated "*The Residential Infill Project will address the scale, size, mass and location of new single-family construction to **help protect the unique character of Portland's treasured neighborhoods**. But it will also look at smaller forms of housing (skinny houses, stacked flats, cottages, etc.) to ensure that **where they are allowed**, these more affordable forms of housing reflect the desired character of the single-dwelling zones.*" The current proposal does more to address the alternate forms of housing and offers little to no protection of neighborhood character.

Some Concerns:

- 1.) We do not agree with using a Housing Overlay to re-zone large portions of the city without residents having the due process provided by a proper re-zoning process.
- 2.) We protest the broad brush of the overlay zone being a distance buffer around transit lines with no regard to neighborhood contexts. For example, South Burlingame is inside the overlay because of transit on Barbur Blvd, but the access is bisected by Interstate 5. These lines are labeled "conceptual" but there is very little confidence the city staff will hear our association's recommendation of an appropriate application of the overlay boundary.
- 3.) The proposal does nothing to address scale or neighborhood character. All of the houses in our neighborhood, with exception of the recent infill houses, are much smaller than the proposed heights and sizes.
- 4.) The proposal will increase demolitions of homes in our neighborhood.
- 5.) We are very concerned that the city appears unresponsive to our and other neighborhood's public input.
- 6.) Mostly, we are concerned that our neighborhood does not have the infrastructure and amenities to accommodate the density as proposed. We have inadequate public transit, and barriers to walkability, hilly terrain devoid of sidewalks and cross walks, and impassable roads such as Interstate 5.

What we do support:

- 1.) ADU's. We encourage the building of external and internal ADUs to provide more housing options. The city should find ways to encourage conversions instead of demolitions of existing affordable houses.
- 2.) Code that ensures scale of housing fits neighborhood context and protects solar access and privacy. The vast majority of our neighborhood is single story or single story with dormer, with twenty plus feet setbacks being common. The only houses that are common to the proposed two plus story buildings with fifteen foot setbacks are the new infill homes.
- 3.) Promote ways to save viable housing when possible.
- 4.) Provide clear codes that avoid inconsistent and confusing criteria such as density or overlays.
- 5.) Direct density around centers consistent with the Comprehensive Plan to create walking scale neighborhoods and encourage transit and reduce auto use.
- 6.) Evaluate and make changes in higher density areas to find out why existing regulations are not working, and re-zone where appropriate.

Our highest concerns is the city is taking a "one size fits all" to the application of the overlay zone. Our neighborhood, like many in the southwest, does not have many of the amenities needed to support density. This includes basic infrastructure like sidewalks on collectors or storm drainage. Also the proposed size of the houses is out of scale and will overcrowd the existing homes thus destroying our unique character.

Attached to this letter is the written testimony of Loren Lutzenhiser, and his clear study on some of the potential unintended consequences of this proposal as it stands. We feel the city should take a moment to understand his positions and how the developers, architects, builders, and real estate agents on the RIP SAC have a vested interest in this proposal passing to increase their profitability. We also encourage you to review the testimony of the RIPSAC 7, who raised legitimate concerns regarding this proposal.



Robert Lennox
President
South Burlingame Neighborhood Association

**Testimony to the Portland City Council
Public Hearing on Residential Infill Project Concept Report (Nov. 16, 2016)**

Loren Lutzenhiser
Professor Emeritus of Urban Studies & Planning
Portland State University
7010 SE 36th Avenue
Portland, OR 97202

BACKGROUND

The Residential Infill Project Stakeholder Advisory Committee (RIPSAC) has proposed a set of new zoning conditions that would be applied to most residential areas east of the Willamette River. The proposed changes would increase the number of housing units permitted per lot. The hoped-for development of “missing middle” small multi-family housing is intended to provide home owners and renters a new supply of affordable housing, while advancing goals to increase population density to accommodate continuing in-migration.

The RIPSAC was originally created to advise City Council about possible solutions to the problem of demolitions of smaller, older existing housing units and their replacement with larger new structures. The housing torn down was modest and much more affordable than the replacements. However, developers have frequently claimed that they were simply “providing density” to address city planning goals. The RIPSAC rezoning proposal before the Council does not address demolitions, but does create new regulations for replacement buildings, encouraging them to be multi-family duplexes and triplexes, with accessory dwelling units (ADUs).

When the RIPSAC proposal was made public, I was in the process of research on the carbon emissions related to demolition, construction and ongoing energy use in older vs. newer housing. It was relatively easy to expand the scope of that work to also consider the economics of demolition and construction of proposed duplex units with ADUs, taking a critical look at affordability and density benefits and costs.

RESEARCH QUESTIONS

The purpose of the analysis was to objectively consider 3 key questions by examining publically available data.

These are:

- 1) “How affordable would envisioned housing be, and for whom, given current land, permit and construction costs?”
- 2) “How should we think analytically about ‘density benefits’ rather than simply assuming that more housing units naturally translate into larger housed populations?” “How much population density could be achieved via the rezoning strategy, and at what cost compared to other, non-demolition, alternatives?” and
- 3) “Are there possible unintended consequences of the RIPSAC rezoning in terms of community impacts?”

ANALYSIS

I performed a number of analyses to attempt to address these questions, using information on market values for recently demolished houses, along with estimates of replacement housing costs (for envisioned duplexes and ADUs), in order to estimate a range of *necessary pricing* for the new units.

I then used U.S. Census data on Portland household incomes and annual housing expenses (e.g., mortgage payments, insurance, utilities, and taxes for home owners; rents and utilities for renters) to conduct an *affordability analysis*. I was able to compare Portland incomes with total housing costs for new duplexes and ADUs to determine how many households would find them affordable (by HUD definition of 30% or less of gross annual income for total housing costs).

I then examined the cost of building and leasing rental units, using current median rental rates, to see how many households would be able to afford the envisioned units as rentals. I also modeled the costs, rents and profits estimated for the extreme case of absentee investor development of triple skinny house units plus ADUs on lots with underlying 25' lot lines, as proposed in the RIPSAC rezoning. And I drew on social science scholarship on community and displacement to speculate about possible *impacts on neighborhoods* with lower versus higher demolition house values.

Finally, I considered density question by examining the current sizes of Portland households and the mismatch between more affordable demolished units that could be adapted for larger households, versus the newer units (both currently being built and envisioned) that are, in reality, often occupied by small households. As an added bonus, I included estimates of *carbon emissions* for a range of housing types, as well as aggregate costs of alternative public policies focused on “remodel and retrofit” versus “demolish and replace.”

FINDINGS

Details of the data, assumptions, models, and analysis are not reported here, but can be shared. For present purposes, I will provide short summaries of my findings.

The High-Level Findings are:

- Given current costs and incomes, the RIPSAC rezoning will produce duplex housing that is affordable to a *surprisingly small fraction* of the population—those who have the highest incomes and the fewest current affordability problems. Over time, the size of this group will *continue to shrink*.
- ADUs show *potential* for affordability. However, 60% of the population with the lowest incomes and the greatest affordable housing needs would see no benefit.
- Rentals are *even less affordable* than owner-occupied duplexes and ADUs.
- Demographic realities mean that *density benefits are not significant* when compared to less costly non-demolition alternatives, particularly with currently permitted ADUs.
- There is an extreme overlooked scenario that combines absentee investor-owned 4-6 unit multiplexes on plots with underlying unused lot lines and R2.5 rezoning that poses a risk to the city of *self-inflicted policy damage* that would *accelerate gentrification* and *erode social capital and community*.

Affordability

Considers affordability issues and benefits for different envisioned housing types and forms of ownership.¹

(1) Ownership of Duplexes

- The envisioned duplexes are only affordable as an *ownership option* to the highest income 15-20% of the current renter population (incomes of \$75,000-\$85,000/year are required, depending on land costs and building qualities). As the cost of acquiring homes to demolish continues to increase, the income required to afford duplexes also increases—so a shrinking fraction of the population will be able to afford the units.
- U.S. Census data show that those Portland residents who are suffering most from rising rents and residential real estate prices are also those with the lowest incomes. They simply cannot afford the imagined new duplex units.
- These data also show that a very small fraction (1-2%) of households with incomes above \$75,000 have housing affordability problems.

(2) Ownership of ADUs

- ADUs *do represent a more promising housing ownership alternative* that could be affordable for purchase by a household earning around \$22/hr. ADUs would be affordable for as much as 40% of the renter population (i.e., households with incomes of at least \$45,000/year; a higher-end ADU might require as much as \$65,000). However, there are also challenges to ADU ownership, and the required condominium model is not yet well developed in Portland.

(3) Duplexes and ADUs as Rentals are Profitable Under Limited Circumstances

- At current high median *market rental rates* in Portland, the envisioned duplexes and associated ADUs could be developed as investment rental properties. A dispersed site, small duplex + ADU model could be profitable for investors under some circumstances. However, the analysis shows that profit potentials decline quickly as the cost increases to acquire houses to demolish.
- The building and operating of a duplex as a rental property is *not profitable* at current median rents if land costs are more than \$200,000 (very difficult to find in the Portland market). A duplex with an associated ADU can be modestly profitable when houses to be demolished cost \$300,000 or less—which is also a rapidly shrinking share of the residential real estate market. Most units even at that price point are located in areas with fewer services, amenities and employment opportunities.

(4) The Rental Model Provides Units that are Even Less Affordable than Ownership

- The current market rents for duplex units would be about \$2,220/month and \$1,300/month for ADUs. These may seem to be reasonable amounts, given recent rapid rise in rents. However, at these prices the duplexes are affordable only to the highest income 15% of the renter population, and the ADUs to the highest income 35%. Because of the challenges to ADU ownership mentioned above, the higher-cost ADU renter-occupied option is probably the more likely short-term arrangement, with the noted shrinking of population for which the ADU is affordable.

(5) The Rental Model Involves Greater Income Transfer

- Median market rents for these units represent a *housing cost that is at least 15-20% higher* than for *identical owner-occupied units (not factoring in the Federal interest mortgage tax deduction)*. Renters are paying the same expenses as they would if they were owners, *plus* investors' higher costs of borrowed capital, ROI on landlords' own investment, management costs, and profits. This rental model can "work" for investors (under the limited conditions described), but at the expense of higher housing costs for renters in units that are then affordable to an even smaller share of the population.
- The envisioned duplexes plus ADUs *as rental units* are, in fact, the *least affordable* housing option in the entire RIPSAC rezoning scheme. They would actually represent a new city-sponsored form of wealth transfer.

Density

- Analysis finds that renovation of existing dwellings (rather than demolishing them), and adding ADUs to those and additional sites, would achieve the same density as demolition-with-duplex+ADU-replacement—*at about 15% of the total cost to the households involved*.
- Population density is related to numbers of housing units. However, there is not a one-to-one correlation. The wild card is household size. Additional units, even those designed for larger households, may end up being occupied by only 1-2 people. So it is *very tricky* to try to increase population density by simply increasing housing unit density.
- Portland *household sizes are very small* and have been trending in that direction for decades. Current demographics would shock someone who thinks that a two adult plus two-child household is at all typical. These are the Census estimates for 2015: one person 34%, two persons 33%, three persons 15%, four persons 12%, five or more persons 6%. *One and two person households represent the vast majority (67%) of the population*. Four or more person households of any sort (including stereotypical "nuclear" families and other forms, with and without children) represent less than 1/5th (18%) of the population. These are the demographic realities that any housing policy must face. And they mean that, no matter how many new units are provided, *the vast majority will be occupied by very small households*.
- This means that achieving higher densities is not a simple matter of adding more units. Each additional unit is most likely to house single persons and small groups *much more expensively* and much less efficiently than was the case in the 1950s and 1960s, when many of the dwellings being demolished now were built as "family homes," that accommodated then (and could again) larger households. City policy might fruitfully focus on enabling "right size" matching of those dwellings and family households.

Environmental Cost and Benefits

- Although new construction is often claimed to be highly energy efficient (e.g., with various green certifications and modern code requirements), detailed building energy performance modeling finds that the consumption and CO2 emissions differences *are negligible* between a duplex plus ADU combination vs. a renovated existing building

with an ADU. The newly constructed buildings use only about 3% less energy than the “renovate + ADU” configuration.

- In assessing the environmental impacts from demolition and construction, we are dealing with less certain estimates (although we used the best available data bases and lifecycle carbon analysis software available). So it is the *comparison* of values and not *the absolute values* themselves that are important.
- Our demolition and new construction carbon emissions estimate is in the neighborhood of 47,000 pounds of CO2 emitted in the demo-construction process. The estimate for a major energy retrofit of an existing house is about 1,500 lbs (about 1/30th as much), and building a new ADU is estimated to produce around 12,000 pounds of CO2.

A Very Concerning Scenario

In cases of 75’ wide lots with 25’ underlying lot lines in a few parts of the city, absentee investors could conceivably build 3-unit attached skinny houses with at least one ADU through a series of permitted demolitions that could have *significant unintended consequences*.

This Business Model Requires Predatory Land Acquisition and Low Construction Costs

- To be optimally profitable, this business model requires maximizing the number of rental units on what had been a single-family home site. The RIPSAC report is ambiguous about whether the number of ADUs allowed on a 3-unit site would be one or three. If the latter, the unit density could go from one to six virtually overnight.
- The model also encourages predatory acquisition of 75’ lots that have underlying lots of record. And it encourages the construction of the cheapest units possible units, with no design review anticipated in the rezoning proposal.

Concentrating Wealth Transfer

- The rental analysis showed that investor profitability requires high market rents and significant cash flows from renters to landlord investors, and at higher total housing costs than would be the case of owner-occupied units.
- The multi-plex/narrow lot pattern concentrates and amplifies those cash flows, making this option more financially attractive to investors (including absentee investors), without increasing the supply of affordable housing. If anything, it contributes to less affordability.
- From a density benefit standpoint, there may be an opportunity to shoehorn in 1-2 additional residents on a site. But at higher environmental costs and with other possible negative neighborhood impacts.

City-sponsored Acceleration of Gentrification

- There is a long and tragic history of urban renewal in Portland that has resulted in gentrification and displacement still occurring decades later. While “renewal” policies are always claimed to be “for the greater good” by their advocates, developers and civic

elites, we should take seriously the lessons from the city's gentrification and displacement past.

- Many neighborhoods where there are already real housing problems and somewhat lower property values, would be prime targets for one-lot multiplexes (with at least four units) if underlying lot lines trigger conversion of the area to R2.5 as proposed in the RIPSAC rezoning.
- It would take relatively few mini-rental-complexes of this sort, with occupants who have the higher incomes needed to pay the much higher rents, to begin to put pressure on neighborhoods. Successful investments could spur similar investments in this scenario. With rising surrounding property values, an acceleration of gentrification is quite imaginable.
- While many neighborhoods desperately need investment and development (particularly community development and employment development), the current residents would not benefit from this other sort of multiplex "development." To the contrary, gentrification and displacement could actually be accelerated by city-sponsored rezoning policies.

Impacts on Social Capital and Community

- Not just in lower income neighborhoods, but in many neighborhoods in Southeast and North Portland, this multiplex investment pattern could have negative effects on social capital and community not even considered in the seemingly benign "missing middle" imagery. When applied to neighborhoods with underlying skinny lot lines, policy-by-imagery without rigorous analysis can create unintended social and community impacts. For example, the underlying small lot plats are historical artifacts of a time when buyers wanted the flexibility to buy 50', 75' or 100' lots (virtually none have survived as 25' lots). These would be treated as R2.5 zones, described in the RIPSAC report as *"The R2.5 zone often functions as a transition between higher intensity zones (commercial or multi-dwelling) and lower intensity single-dwelling zones."* However, these lots are often nowhere near "higher density" areas. They occur in traditional single-family neighborhoods that are not close to neighborhood retail centers, corridors or good transit. The rezoning and requirements for multiplexes on redeveloped R2.5 lots, then, requires cars, parking, traffic, and a variety of other unconsidered knock-on effects in those neighborhoods.
- The renters who can afford these multiplex units may well be more transitory and spend less time in the neighborhood. There could certainly be many benefits to social capital of bringing in new residents with different values, new networks/connections and serving as different role models. However, if this is an investor-driven process (vs. community driven or city planning managed process), aggressive development of this housing style could result in rapid, uncontrollable neighborhood change.
- In neighborhoods with higher property values, triple skinny units plus with at least one ADU could be built through demolition of one (even a fairly expensive), single family home, creating multiple high rent properties quite rapidly—financed by absentee owners, using borrowed money and extracting future equity from renters' lease payments. Those landlords would have no stake in the neighborhood, would

communicate with their tenants through corporate property management companies, and would have little concern for the aesthetics or social impacts of their investment schemes. There would be no design review, so the cheapest possible three story, plain box 30'+ tall buildings with added ADUs could be shoe horned onto a site with no opportunity for protest. BPS would have no control. BDS would offer expedited approvals.

- Sadly, there would be little public benefit from this. But if this development pattern happened 3 or 4 times on a street and across 7 or 8 adjacent blocks over a few years, the impacts on the social fabric of neighborhoods could be substantial. Much more than neighborhood “character” is at stake. So too is the strength of supportive social networks of known neighbors who look out for each other, share histories and experiences, support one another, and sustain social bonds, networks and resilience.

POSITIVE POLICY RECOMMENDATIONS

The analyses reported above point to reasons to be concerned. But they also identify opportunities for policy innovation that can lead to positive and sustainable social, environmental and economic change.

Encourage and Expand Support for ADUs

- Although ADUs are as an affordable housing solution for only about 50% Portland households (35% if the rental option is the most likely in the short term), ADUs do represent a real, tested and proven *housing solution* with both affordability and density benefits.
- ADUs *do not require rezoning*. They are already permitted in all single-family residential zones. ADUs are also incentivized by renewed waivers of SDCs.
- ADUs represent an important form of housing for one and two person households, who otherwise might opt for larger existing or new houses. At their maximum permitted size of 800 square feet, ADUs are also completely suitable forms of housing for families (who often occupy apartments that size and smaller in outer ring suburbs).
- The proposed ADUs are *much more affordable* as an ownership option, which would be available to 50% of the renter population, with incomes around \$35,000/year. Challenges to ADU ownership have been noted and need to be squarely addressed by city bureaus and partners. If new policies are needed, they should be advanced.
- Some ADUs are being built. Many more are needed. There are likely problems to be addressed in order to more *rapidly increase* the numbers of ADUs. These include financing, landlord training/support/assistance, design and construction practices, lack of visible examples in many neighborhoods, and possible renter preferences. All of these could be fruitfully addressed by focusing the attention of city bureaus and affordable housing advocates on the problem of accelerating ADU construction.

Renovate and Retrofit, Don't Demolish

- More attention should be paid to the original mandate of the RIPSAC—assessing the harms of demolition and considering alternatives (not just changing the footprint and

number of housing units in a new structure). Analysis shows that renovation and energy retrofit is cost-effective, offers a good solution for housing more Portland residents and/or larger households, while providing environmental benefits that are as good or better than demolition and replacement.

- What would public policy look like that emphasized and facilitated renovation and retrofit? The conversation seems to be worth having now.
- There has long been considerable support for demolition and new construction because of the large profits and resource flows involved for developers, builders, investors, and city agencies. Renovation and retrofit solutions need comparable support from environmental actors, affordability advocates and Portland residents committed to sustainable solutions. Advocacy is needed for a better balance of community versus economic benefits and needs.

Create Opportunities for Families to Own Renovated Homes

- Policy could focus on how we can re-occupy homes and neighborhoods that used to shelter families and foster community. The multiple benefits of having families and children in neighborhoods—to schools, intergenerational community and voluntary institutions centered in neighborhoods—should be recognized and pursued in public policy. Demolitions, Mansions occupied by small adult households, and unplanned multiplexes do not offer positive policy pathways to realizing those benefits. It would be great if talented people like the RIPSAC members could focus energies and attention on a real “renewal” of Portland neighborhoods appropriate to the challenges we face.

Focus Expertise on Comprehensive Housing/Zoning/Environmental Policy

- The RIPSAC proposals represent a large-scale experiment in social engineering, intended to increase population density and affordability. There is little evidence that the rezoning or the new building forms envisioned would contribute very much to affordability or density. If the point of public policy is to create *actual solutions*, then social engineering is indeed called for. It would be useful, however, if actual social science knowledge about communities, urban change, policy impacts, and the effectiveness of different intervention approaches was brought to bear in working carefully and thoughtfully toward those solutions. At the end of the day, the RIPSAC process and proposals seem to be more aspirational than practical. Rezoning is a very blunt instrument and using it in these ways risks shortfall in hoped-for results, unintended costs and harms, continuing (at least not reduced) inequities, and a really short sighted “well, at least we tried something” response to serious—some would say *wicked*—but certainly not intractable problems.

Data and Analytic Tools Used

- Construction cost estimate databases and studies.
- Bureau of Development Services fee and system development charge (SDC) calculator and examples.
- Multnomah County Assessor tax records on property values for home demolished in 2013 and for new homes replacing them in 2014-15.
- Zillow.com home sales and rental price data for units within Portland city limits.
- U.S. Census of Population, public use micro data sample: Portland, OR.

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Acknowledgements

I want to acknowledge my PSU colleagues who contributed to ongoing research that I was able to draw upon for this testimony. They include: Anthony Levenda, Aaron Ingle, Vivek Shandas, Amber Ayers, and Meg Merrick. Their expertise is outstanding. However, the conclusions and recommendations in this document are mine, and not necessarily theirs.

APPENDIX TABLE 1

Portland Renter Incomes and % of Income Spent for Housing

Household Annual Income	Percent of Income Spent on Housing						Total
	A 10% and less	B 10-20%	C 20-30%	D 30-40%	E 40-50%	F More than 50%	
\$ 0-10K	2%	1%	4%	5%	4%	15%	5%
\$ 10-20k	4%	3%	8%	11%	25%	47%	16%
\$ 20-30k	3%	3%	9%	23%	31%	23%	14%
\$ 30-40k	5%	5%	16%	24%	17%	9%	13%
\$ 40-50k	2%	8%	17%	13%	12%	3%	10%
\$ 50-60k	4%	10%	12%	9%	5%	2%	8%
\$ 60-75k	7%	17%	13%	8%	5%	1%	10%
\$ 75-100k	10%	22%	11%	4%	1%	0.3%	10%
\$ 100-150k	23%	20%	7%	3%	0.2%		8%
\$ 150-200k	13%	7%	2%	0.4%			3%
\$ GT 200k	29%	5%	0.2%				3%
<i>Total</i>	<i>100%</i>	<i>100%</i>	<i>100%</i>	<i>100%</i>	<i>100%</i>	<i>100%</i>	<i>100%</i>

APPENDIX TABLE 2

Portland Household Sizes (ACS 2014)

	Renter occupied:	Owner occupied:	Combined
1 person	52,317 45%	34,931 25%	87,248 34%
2 persons	36,250 31%	47,053 34%	83,303 33%
3 persons	12,807 11%	24,220 18%	37,027 15%
4 persons	9,060 8%	20,152 15%	29,212 12%
5 persons	4,272 4%	6,687 5%	10,959 4%
6+ persons	2,114 2%	3,957 3%	6,071 2%
Totals:	116,820 46%	137,000 54%	253,820 100%

NOTES ON METHODOLOGY AND CAVEATS ABOUT ANALYSIS AND CONCLUSIONS

The analysis reported here used data on land values from current real estate listings. Replacement building construction costs were obtained from building industry cost estimation software as well as published sources and recent builders surveys by the National Association of Home Builders. These estimates are, by their very nature, imprecise since they depend on costs for materials, labor, fixtures, finishes, and a range of construction “soft costs” that are proprietary information closely held by builders. Every effort was made, therefore, to use the most conservative estimates of construction costs. Permit fee costs and system development charges (the latter currently waived for ADUs and not used in ADU-related calculations) were estimated using the Bureau of Development Services cost calculator and published examples. Interest rates were obtained from published sources, and for commercial loans for rental construction from consultation with local lenders. Mortgage costs were calculated with standard spreadsheet functions (checked against online commercial estimators). Taxes were estimated from samples of actual new residential units in Assessor records and Portland Maps. Utility costs were estimated by reference to building energy simulation modeling performed for prior work. Median rents and rental rates per square foot were obtained from Zillow current reports. Income and household size information was obtained from the U.S. Census, American Community Survey for the area within the city limits of Portland for 2014 (the most recent sample available when the analysis was performed)

The purpose of the analysis was not to provide precise estimates, but values that could be compared (apples to apples) to realistically approximate economic and demographic realities using the best publically available information.

A number of factors that we could not measure or approximate with any confidence included some that might work to reduce estimates of ownership costs a bit (e.g., the Federal mortgage interest tax deduction) and would make the owner vs. renter cost differentials even larger than we reported (i.e., renter costs would be even higher in comparison). Other omitted factors work in the opposite direction—increasing the real world costs of new construction for both owner-occupied and rental unit cases. Again, we don’t know the precise magnitudes of these values. But taken together they mean that our estimates of total costs are clearly too low. These sorts of costs include: asbestos removal costs, demolition costs, site preparation costs, construction financing, and realtors’ fees. The costs of materials, fixtures and finishes have a dramatic effect on construction costs (30% of total for these costs according to the NAHB study). We assumed only minimum quality that is almost certainly exceeded in much new construction in the city. Also, we modeled the duplex units as single family homes in the given maximum volume allowed by the rezoning proposal (2500 sq ft above grade, with 15% density bonus if an ADU is included). Therefore, we did not estimate the additional cost (in the duplex case) of two kitchens, multiple baths, duplicated HVAC systems, wiring, plumbing or appliances. So we are confident that our total construction cost estimates used to compare costs to incomes are systematically *lower* than in the real world. This means that affordability estimates reported here are most likely very conservative. For example, if we estimate that 20% of the population might find option A, B or C affordable by HUD standards, in the real world that value might actually turn out to be 15% or even 10%.

For simplicity, we do report results for modeling triplex owned or rented units. In the rental case, these smaller units would occupy the same volume in the building as would duplex units and would not change the profitability calculus of the investor. Rents would be similar to ADU rents (close in size). As ownership options, their affordability would be a little less than ADUs. But we assume that the triplex option, being more costly to build than duplexes (triple kitchens, baths, etc.) and only on corner lots, would likely be much rarer than duplexes.

November 04, 2016

Linda Bauer, Appointee - East Portland Action Plan
 Sarah Cantine, Architect - Boise NA Land Use
 Jim Gorter, Appointee - Southwest Neighborhoods, Inc.
 Rod Merrick, Architect - Eastmoreland NA Land Use
 Rick Michaelson, Appointee – Neighbors West/Northwest
 Michael Molinaro, Architect, Appointee – Southeast Uplift
 Barbara Strunk, Appointee – United Neighborhoods for Reform

We are representing a coherent and cohesive third of the RIPSAC appointees. Our shared perspective is to approach planning as neighborhoods, building around centers in **neighborhood context** consistent with supporting Goals in the 2035 Comprehensive Plan.

We have given many hundreds of hours both in the RIPSAC meetings and in meeting as a group to formulate our analysis and recommendations summarized in this analysis.

We all care deeply about our city and we applaud the effort to consider how and where to focus housing density and how to guide the growth of the city in a period of rapid growth. This was a promising start that ultimately ran entirely off the rails. **If the concern is affordability this project is a false promise. If the concern is a more walkable lively city, this is a false promise. If the concern is a reduction of house size this is a false promise, and finally if this is an attempt to reduce demolitions...well no, it is not.**

Subject: Comment on the October 2016 Residential Infill Project (RIP) Concept Report

We focus first on the significant implications of the “Concept Report to Council”. Following this is a discussion of the **10 RIP Recommendations** and how they address the issues that frame **concerns underlying the project** but fails to address from speculative demolitions and housing costs to a zoning code that is misaligned with policies and goals in the Comprehensive Plan. We then look for common ground in the **three subject areas** that the RIPSAC was chartered to address along with an assessment of the results in those areas. In the summary, we highlight recommendations.

Significant Implications of the “Concept Report”

- **The entire inner east side and part of the west side of Portland is to be rezoned by assigning a “housing opportunity zone” overlay designation that increases allowed density by 200 to 300%. The already compromised R5 zoning density designation with its substandard minimum lot sizes is retained in name only. The plan encourages triplexes on every corner, duplexes or a house with two accessory dwelling units on every 3,000 to 7,000 SF lot, and small cluster housing plus ADUs on every lot of 10,000 SF or greater. This is an unprecedented “entitlement” for developers. It is *not* justified by a shortage of land designated for higher density in the Comprehensive Plan but by the claim that innovative housing is desired in Portland. At the same time it is a taking from every stakeholder for whom zoning provides stability and predictability promised in the Comprehensive Plan.**
- **Ownership standards are implicitly restructured from fee simple to a condominium basis since ADUs will no longer be “accessory” but able to be sold independently as will the duplexes, courtyard clusters, and corner tri-plexes that will be constrained to a single tax lot under the plan. Middle housing is primarily rental housing. Middle class resident owners will be displaced. Portland will transition to a city of investor-owners and renters.**

- The density encouraged by this “overlay” is greater than that permitted in the multi-family R2 (2,000 SF per dwelling unit) zone further confusing the intent and integrity of the density designated code. The single family neighborhood zone, an essential characteristic of this city with one house per lot is effectively erased from most of Portland.
- By widely distributing density the proposal fails to focus density around centers consistent with the 2035 Comprehensive Plan. Neighborhoods that did not fit the ¼ mile bubble distance from corridors are declared “housing opportunity zones” in the name of “equity” without justification. The numerous skinny lots and lots with underlying lot lines less than 5,000 SF within this zone are defacto rezoned to R2.5. West side neighborhoods not within 1/4 mile of corridors and Portland’s west suburbs are not impacted presumably to diffuse opposition. The David Douglas school district is excluded while they develop a school expansion plan. Parking impacts are not addressed and transportation benefits are not analyzed. The false claim is made that this will produce more walkable neighborhoods
- The purported scale reduction is a clever gambit. The one size fits all approach allows structures greater than roughly 80% of the existing housing stock. Except for constraining the few very large houses and limiting the size of triplex and small lot units, little has been done to reduce the scale of buildings. Unpopular skinny houses are enshrined and allowed to grow higher. Nevertheless the home-builders, who vigorously supported the concept, are already asking for a larger envelope.
- The proposal entitles developers of new or remodeled multi-family structures on a *salable area* of roughly 3875 square feet including the basement level plus a 15% density bonus in all impacted neighborhoods zoned R5. On a 7500 SF lot for example the salable area increases up to 6200 SF. Additional height and area bonuses for converting existing homes to multi-family is proposed. The economic analysis (Appendix A) presumes that the *saleable area* of the structure is the FAR ration or 2500 SF for a 5000 SF lot.

Consequently the economic analysis may be characterized as flagrantly erroneous. Increasing the number of rental or condominium housing units on a site will certainly accelerate speculation, demolition and displacement in the most vulnerable neighborhoods and remove our most affordable housing stock.

- The “innovative” building types promoted by the plan are neither innovative nor apparently in high demand. All are currently allowed in the multi-family zones in the city of Portland. Very few developers have taken advantage of the available density entitlements. In fact most infill in the R2.5, R2, and R1 is built to a lower density than allowed. Three reasons might be that small scale condominiums are often problematic to finance, own, and manage.

Older houses divided into rental apartments are perhaps the most common examples of what the Report is calling “middle housing”. As an incentive to increase such existing house conversions a size and height bonus is recommended. Because fire, seismic, and acoustic privacy requirements make remodeling of existing housing is expensive, planning staff suggested that they will recommend changes to the Building Code to reduce requirements tailored to such conversion projects. This is unwise - except to protect historic resources.

- In character, the Report is a uniquely untested collection of hastily considered proposals that promote a density agenda, high-jacked by the housing availability crisis, marketed in the disguise of affordability, innovation, and compromise. The report contains an unprecedented radical redefinition of zoning that ignores most of the relevant goals and policies of the Comprehensive Plan.
- The RIP outreach process was non-responsive to the public comment process. Staff chose to portray a complex and confusing survey as the primary basis for claiming that there was wide support for the Project. The project statistician described it this way: "In total, 2,375 respondents answered *at least one* non-demographic question, and 610 completed every closed-ended question". A survey completed by 600 people covering a wide spectrum of issues and a far less aggressive approach is presented as the basis for claiming a wide diversity of public support for the RIP. The overwhelming opposition in public meetings to the ¼ mile bubble from folks who took the time to attend meetings and the 32 Neighborhood Associations that provided thoughtful comment go unmentioned. Of these, 28 expressed strong opposition to widespread application of middle housing. Only 4 expressed support.

Within the 4 neighborhoods expressing support some or all of the Recommendations may be appropriate. If so they should be considered as test sites for the "overlay" for a period of 5 to 10 years to evaluate the implications of these unprecedented policies.

- The RIPSAC itself was overwhelmingly weighted with builders, their lobbyist, developers, and industry partners along with the "housing advocates" who appear to have initiated the "grand bargain" theory that they cribbed from a failed Seattle process. In the end staff described this group as the *majority perspective* when they agreed with the staff proposed policies.

The Proposals: How they address concerns that should have guided the Project

We oppose one-size-fits-all zoning standards that we perceive as contradictory to goals in the adopted comprehensive plan and are not respectful of the variety of neighborhood characteristics that exist in the city, and which lead to simplistic and polarizing regulations. **Recommendations 1, 2, and 3** speak to improving scale, height, and setback standards they are little more than a distraction. And significantly they fail to recognize that *contextual standards* should be a guiding principle. Los Angeles and other cities are modeling a contextual approach. Portland is proposing a generic solution that encourages undifferentiated neighborhoods. **Not grand and no bargain.**

We support the diversity of the neighborhood character. This is a clear mandate in the 2035 Comprehensive Plan. District planning is needed to guide where and how additional density should be accommodated. The process should recognize that the condition of housing, scale, history, transportation, economic factors, and displacement considerations all play a significant role in defining what is appropriate. **All of the recommendations fail on the point and** instead recommend a uniform overlay that creates uncertainty for existing residents and owners and enormous opportunities for investors with no incentives to protect or enhance character.

We support "truth in zoning". This is essential for rebuilding public understanding and confidence in the planning and zoning process and providing clear guidance for owners, designers, builders, and for the land use review process. Considering the primary metric for the zoning code is *density*, we oppose the widespread and indiscriminate application of a density "overlay"

proposed in **Recommendations 4 and 5 and 7 and 8** in the R5 and R7 zones. This only serves to confuse the public and to undermine the integrity and clarity of the code. Densities proposed for the now meaningless “R5-R7” zones would exceed those now allowed in the R2 zone and in some case the R1 zone.

We oppose recognition of historic underlying lot lines except where these align with the density standards within an appropriate zone designation. The result for *all* neighborhoods burdened with these has been destabilization, demolition, and speculation. **Recommendation 8 and 9** are the nails in the coffin. The introductory narrative poses the misleading statement that “State law requires cities to recognize these lots as discrete parcels”. Significantly, Oregon law does not require that parcel boundaries trump zoning. **Recommendation 8b** appears to support that fact. **Recommendation 8a** recommends that such narrow (and skinny) lots be recognized *everywhere* in the housing opportunity overlay and simultaneously **rezoned to R2.5!** Since almost all are within the “opportunity overlay” this uses historic lot lines to trump zoning. The present restraints to demolition of existing housing are removed.

The R2.5 designation confers significant density and size bonuses. Recommendation 9 a,b,c,d,e allows 3 floors, larger(.7) FAR multiplier, higher roof and requires at least two unit replacement housing. The authors are playing false on every count. Assurances made by the PSC in 2015 to fix the underlying lot phenomenon in zoning reform are voided.

We support additional zoning density around Centers, and where appropriate along Corridors as in the current and 2035 Comprehensive Plan, to reinforce the establishment of *new and existing* centers, walking scale neighborhoods, use of transit and reduced auto dependency. This is a successful model advocated during the past 40 years and is yet to be realized, either in Portland or in the Metro Region. Scattered site middle housing in **Recommendations 4, 5, 6, and 9** undermine this goal.

We oppose scatter site density that will be the result of rezoning the entire eastside as a “housing opportunity zone overlay.” **Recommendations 4, 8, and 9 are diametrically opposed to the shaped density advocated in the Comprehensive Plan.** The last minute Comp Plan amendment P45 set an overly ambitious bubble around ill-defined corridors. Scattered “middle housing” defeats comprehensive plan goals to focus density around currently underbuilt walking scale centers. Our data will show that widespread application of “middle housing” zoning will accelerate land price increases in an already overheated market, decrease affordability, destabilize neighborhoods, cause loss of viable and more affordable housing, and increase demolition and displacement.

We object to untested “speculative” zoning - zoning that has some presumed social good intended but where zoning regulations are implemented without testing and modeling physical and economic impacts prior to implementing code changes. Too often these initiatives seem to be driven by interests whose primary concerns are for a particular niche of real estate development in contrast to the public interest. Earlier decisions to allow recognition of underlying lot lines, encourage skinny houses, and compromise lot sizes are prime examples. **Recommendations 4, 5, 6, 7, 8 and 9** are in this category and the “analysis” is fundamentally flawed. The illustrated examples are not modeled to the allowed envelope. The black box economic analysis in Appendix A begins by using the wrong numbers for “saleable area”.

We object to unsubstantiated claims of creating “affordable” housing for everyone by Portland For Everyone. **Recommendations 4 through 10** are being promoted as a “grand bargain” by housing advocates who have modeled their faith on a failed Seattle initiative

<http://www.seattletimes.com/seattle-news/politics/mayor-murray-withdraws-proposal-to-allow-more-density-in-single-family-zones/>) using the same slogan. There has been no analysis and no evidence that these proposals will result in affordable housing regardless of how it is defined. The economic analysis in Exhibit A is a flawed analysis based on false assumptions.

Higher density does not equate to less expensive housing. As long as there is strong demand for housing and it can be profitably built and sold, rezoning for increased density will cause the value of the land to increase, the demolitions to accelerate, and the housing prices to rise accordingly. We need examples of the densified city that is thereby made more affordable unless in a state of decay and depopulation.

Where is the example of a split lot where the one or two replacement houses (regardless of size) without public subsidy are less expensive than the house demolished? When is the cost per square foot for a smaller house less than for a larger house? Given the same quality the reverse is true. We must address housing affordability as a regional issue with care and urgency not an excuse to provide a handout of unwarranted entitlements and speculative profits at the cost of demolition, displacement, and livability.

Project Objectives, Points of Agreement and Results

Considering the *three areas* included in the RIPSAC charge are there were areas where we found common ground and points of agreement with the staff proposal and fellow RIPSAC members but almost none in the Report to Council.

Scale and Massing Issues: There was a good deal of consensus about the need to address issues of size, height, setbacks, placement of garages, off-street parking, etc. One of our principle concerns and one clearly expressed in the Comprehensive Plan is “one size does not fit all”. Both the Staff Report and The Report to Council clearly fail to address the issue. The Recommendations simply recognize the size of most recent infill and codify that building envelope, height, and setback. Where do we agree? We support floor area ration (FAR) as an additional tool to regulate size, support adjusting the regulation of side lot bays and eaves (Recommendation 3b), and support reducing the impact of garages on skinny houses (Recommendation 10) as a half measure.

Narrow and Skinny lots and Recognition of Underlying lots of record (lot splitting): There is a good deal of disagreement here since the one-for-two house demolition infill and skinny garage housing has become a business model for some developers who have represented these as “affordable” housing and thus aligned themselves with housing advocates. At \$600,000 to \$700,000 in some neighborhoods they don’t contribute to affordability.

These lot line policies have been applied indiscriminately across the city, are making a lot of adjacent neighbors very unhappy, have a heavy carbon and poor space use footprint, create an unattractive streetscape, and are not producing much additional or affordable housing. Market rate new housing is not affordable but is very profitable and is systematically removing more affordable housing. *We supported the initial staff recommendation that began to address Truth in Zoning by limiting the use of these underlying lot lines for splitting lots in the R5 zone.* But in the Report to Council these lots are being redefined as spot zoned R2.5 and that erases any point of agreement.

We do agree is that the underlying lots should be recognized where the lot division is consistent with the density standards in the zoning code. Otherwise *the experiment with complex and confusing code provisions encouraging this kind of wasteful demo-development should end.*

Innovative housing Types: As we explored these ideas it became increasingly clear that *the housing types discussed (except cottage clusters) were not so much innovative as not being built where the code allows*. Developers are not building to the density already generally allowed around centers and corridors. In preparing the Report to Council, staff commissioned a special study to see if carving up examples of existing housing into smaller apartments is feasible. Possible yes, and expensive. The current zoning around centers is appropriate and needs refinement not more scattered density across broad areas of the city. The cottage cluster proposal (Recommendation 6) appears to allow approximately five 1,000 SF units on a 10,000 SF lot plus basements. For some reason outside the “overlay” there would be 10 units allowed including the “ADU”s. This is the density of the R-1 zone with no off street parking and appears to be a hand out to niche developers.

These proposals in the first and more constrained version received a widespread and justifiably hostile reaction from the public as a handout to developers and a formula for speculation, accelerated demolition, and neighborhood disruption and displacement.

Summary Recommendations

Summary of recommendations in the context of the project goals include:

Scale and Massing Issues:

1. Create development typologies that fit neighborhood context and aspirations. (look for examples such as Nori Winter’s work in other cities) *One size does not fit all.*
2. Ensure that scale of houses fits neighborhood context, protect solar access and privacy, and maintain individual and shared green spaces.
3. The code must be clear. Use commonly understood terms. Provide clear definitions of what is allowed in each zone. Restore “truth in zoning.” Avoid inconsistent and confusing criteria such density when lot sizes or “overlays” governing dwelling unit counts, or unit size are the governing criteria.
4. Save viable existing housing. The most affordable housing is almost always housing that is already in place.

Narrow and Skinny lots and Recognition

5. Remove provisions that allow lots smaller than 4500 SF in the R5 zone. Allow historically platted narrow and skinny lots to be *confirmed only* in the R2.5 zone. **Recommendation 8b is a start.** *End the use of historic lines to trump zoning as advocated in Recommendation 8a.* This is not consistent with the Comprehensive Plan or a mandate of state law.

Innovative housing Types:

6. Direct density around centers, **consistent with the above commentary** and the Comprehensive Plan, to reinforce the establishment of centers, walking scale neighborhoods, use of transit and reduction of auto dependency.
7. For areas in the City intended for higher density, evaluate why the existing regulations not working well, adjust and proceed with rezoning for the higher density to reinforce centers and corridors where appropriate.

8. The dispersed density model recommended in the Report will destroy our best loved history and most admired assets. “Middle housing” is for transitional density between single family and higher density multi-family. There is no transition if middle housing is “everywhere” housing.
9. Authorize limited testing of middle housing ideas where the neighborhoods have expressed strong need and support for such an experiment and subsequent evaluation of the policy. Robust evaluation of the proposed policy impacts is necessary.
10. Test and model physical and economic impacts for significant changes to the zoning code prior to drafting and implementing such changes. *Testing includes implementing zone changes in neighborhoods that support the proposals and evaluating the impacts.*

Summary of recommendations for advancing:

- The RIP Report should not be endorsed or accepted for implementation by Council. We have a shortage of housing not a shortage land or a shortage of areas zoned for housing. The RIP Report may be looking forward one-hundred years but the development entitlements proposed are in effect the day of approval - and once given very difficult to unwind.
- The process and many of the recommendations are inconsistent with the goals and policies of the Comprehensive Plan on many levels as discussed above. Instead of “grand bargains” the BPS needs to understand how the current R1, R2, and R2.5 zones could be improved to accommodate transitional or “middle housing” densities.
- The City needs implementation of the Comprehensive Plan in the form of a modern flexible and easy to understand regulations with a long term focus on district and neighborhood planning. Actively engage neighborhood and business associations to participate in decision-making during planning exercises and for major developments to improve understanding of context and needed design guidelines.
- The Recommendations are not aligned with the Mayor’s goals to reduce demolitions, meaningfully temper the scale of houses, or increase density and provide smaller scale housing around centers. Expect much more demolition, speculation, reduced affordability and increased auto dependency from diffuse density.
- The **unprecedented** use of the **Housing Opportunity Zone Overlay** is no substitute for planning but rather a bone thrown to speculators, niche developers and housing advocates without regard for the existing context or fabric of the city.

We challenge ourselves and all Portlanders to think in terms of a vision for Portland and the region that builds on the structure of the good neighborhoods that we have and figure out how to encourage other cities in the region before we do irreparable harm to what we have with poorly conceived ad hoc policies represented by this Report.

JOHN HOLDERNESS

AUDITOR 11/21/16 PM 3:28

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November 21, 2016

Portland City Council
1221 SW 4th Avenue, Room 130,
Portland, OR 97204

Dear Portland City Council,

Subject: Residential Infill Project Proposal

I object to the Residential Infill Project Proposal. Not only do I believe that the proposal will not successfully address its objectives (increased density, more affordability, preservation of older homes and neighborhoods, walkability, and preservation of neighborhood character), but I feel that the project has been overly, and inappropriately, influenced by developers and others who stand to benefit from its current conclusions.

In particular, I object to the "Housing Opportunity Zone" overlay. I see it as a sneaky attempt to circumvent established rezoning procedures, and a one-size-fits-all approach that is really only good for certain individual areas of the city—not for everywhere it is proposed.

The idea that affordability will be improved by tearing down older houses and replacing them with duplexes, triplexes, and ADUs is obviously invalid. Developers will buy and demolish older houses and build new structures that will cost even more. Demolition of older houses will be encouraged, not reduced.

I have seen analyses by a number of knowledgeable people, experts like Professor Lutzenhiser, and by members of the RIPSAC and United Neighborhoods for Reform, all of whom object to adoption of the proposed plan. Please do not support it.

Sincerely,





Mary & John Holderness
8023 SW Ruby Ter.
Portland, OR 97219

By Hand

Portland City Council
1221 SW 4th Avenue, Room 130,
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