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Concordia Neighborhood Association
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May 3rd, 2018

City of Portland Planning and Sustainability Commission
Attn: Residential Infill Project
1900 SW 4th Avenue, Suite 7100
Portland, OR 97201
psc@portlandoregon.gov

Dear Honorable Commissioners,

As you know, the City is at a crossroads. Our single family residential zones contain homes that have ceased to become affordable for the average Portland family to move in to. Yet the current zoning prevents more units from being constructed on lots in these zones, which might act to bring down the cost per new housing unit. Instead, the entire site acquisition cost must be borne by a new single-family house. This results in more and more large, expensive homes that aren't affordable to most of the families who might be able to fully use their space, and generally are purchased by people of means who don't actually need all that room.

Supply, in short, is not meeting demand.

The decision point we find ourselves at is this:

Do we allow this situation to continue and worsen? Or, do we take effective steps to fix it?

After reviewing the latest staff proposal from the Residential Infill Project, we find that the current proposal does not plan to significantly improve the situation with regards to affordability.

No significant changes are proposed from the proposal that was analyzed by Johnson Economics in their October 17, 2016 memo to Tyler Bump of BPS. Indeed, a revised memo from Johnson Economics from April, 2018 confirms that the current staff proposal will not add significantly to the supply of housing units affordable to median-income households in Portland.

In the 2016 memo, the RIP project was projected to actually result in a net reduction of housing units produced in Portland over the next two decades by 8,000 units over the baseline; hardly a ringing endorsement of the success of this proposal! The 2018 memo reverses this and predicts a net increase of 600 or so new homes over the next 20 years, though it rests on questionable assumptions, including that existing homeowners would be willing to accept \$80-\$130,000 as the sales price for their home in central Portland (what the memo refers to as "Residual Land Value"). (Call us if you know somebody willing to sell for those prices, please!)

Further, the Johnson Economics reports indicated that it would be unlikely that any of the

resulting units would be affordable to a household making the Median Family Income or less for the City of Portland.

It is our view, as neighbors who are concerned about the ability of our children, our aging parents, our friends and other potential new neighbors to afford to live near us in the future, that the Residential Infill Project is currently flawed, but that with a few simple fixes, it can be tuned to help deliver a more affordable future for our city.

In that spirit, we respectfully request that the PSC recommend the following changes be made to the staff proposal prior to adoption by Council:


- **‘a’ Overlay:** The new ‘a’ overlay attempts to prevent gentrification and displacement by denying the opportunity to take advantage of the new RIP regulations to areas at risk of gentrification and displacement. As a neighborhood that experienced redlining during the 20th century based on the spatial distribution of people of a particular race, we do not wish to see any other neighborhoods be subject to a policy that effectively red-lines poor neighborhoods of the city, denying property owners there the opportunity to improve their lives and the neighborhood by replacing existing, sub-standard housing stock with newer development that could allow owners to lift themselves out of poverty by the bootstraps, following the American Dream. It’s quite possible that preventing access to opportunity in this manner may be a violation of the federal Fair Housing Act. The City should not seek to deny these sorts of economic opportunities to low-income areas. The new ‘a’ overlay should be applied broadly to all residential zones across the city, or at least to all those within walking distance of transit with 20 minute headways in the peak or better, and/or with bicycle access to high-quality bicycle infrastructure.
- **Economic opportunity:** The current RIP proposal, according to its own economic analysis, will result in limiting new homeowners in Portland’s single-family zones to high-income households. No longer will new construction be affordable to middle-income Portlanders. The price per square foot resulting from these regulations will increase, further accelerating price appreciation of existing homes. We propose an alternate future, one in which lower-income households seeking to live together in a fourplex are able to effectively outbid high-income households seeking to purchase a house for use as a single-family residence. The allowable FAR should thus be increased for new development with multiple units by 0.2 per unit for triplexes and fourplexes; the cap on the number of units within a structure should be lifted (4 or more should be allowed by right); and the height calculation should be changed to clarify that a two-and-a-half-story house will always be legal in all zones. r2.5 zones should maintain their 35-foot height limit and not experience a reduction to 30 feet. Height should be measured from the midpoint elevation adjacent to a structure, not the low point.
- **Form-Based Code:** The City should write a Form-Based Code to regulate its residential zones, or at least those portions subject to the new ‘a’ overlay. This will address the concerns of neighbors about out-of-character development, by specifying the nature of “character.” This would include the specification of amenities such as front porches, while also regulating specific concerns, like height from ground to eaves separately from total structure height, that contribute to the feel of the “urban room” of neighborhood streets. See below for an example

of how a Form Based Code can be used to regulate this sort of development.

Specific to Transect Zones
1703-2.70
1703-2.70
Specific to Transect Zones

T4 Neighborhood Small Footprint (T4N.SF)

1703-2.70 T4 Neighborhood Small Footprint (T4N.SF)



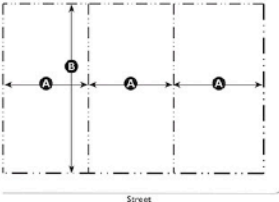
A. Intent
To provide variety of urban housing choices, in small-to-medium footprint, medium-to-high density building types, which reinforce the walkable nature of the neighborhood, support neighborhood-serving retail and service uses adjacent to this Zone, and support public transportation alternatives. The following are generally appropriate form elements in this Zone:

- Detached or Attached
- Narrow-to-Medium Lot Width
- Small-to-Medium Footprint
- Building at or Close to ROW
- Small to No Side Setbacks
- Up to 2½ Stories
- Elevated Ground Floor
- Primarily with Stoops and Porches

B. Sub-Zone(s)
T4N.SF-Open Zone (T4N.SF-O)
The open sub-zone provides the same building form but allows for a more diverse mix of uses.

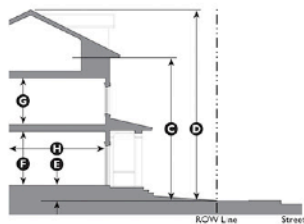
General note: The drawing above is intended to provide a brief overview of this Transect Zone and is illustrative only.

T4 Neighborhood Small Footprint (T4N.SF)



Key
--- ROW / Lot Line

| C. Allowed Building Types | | | |
|---------------------------|-------------|-----------|------------|
| Building Type | Lot Width A | Depth B | Standards |
| Carriage House | n/a | n/a | 1703-3.40 |
| Detached House | 30' min. | 75' min. | 1703-3.60 |
| Compact | 50' max. | | |
| Cottage Court | 75' min. | 100' min. | 1703-3.70 |
| | 100' max. | | |
| Duplex | 40' min. | 100' min. | 1703-3.80 |
| | 75' max. | | |
| Rowhouse | 18' min. | 80' min. | 1703-3.90 |
| | 35' max. | | |
| Multi-Plex: Small | 50' min. | 100' min. | 1703-3.100 |
| | 100' max. | | |
| Live/Work | 18' min. | 80' min. | 1703-3.130 |
| | 35' max. | | |



Key
--- ROW Line

| D. Building Form | |
|--------------------------------------------------------------------------------------------------------------------------|-----------------|
| Height | |
| Main Building | |
| Stories | 2½ stories max. |
| To Eave/Parapet | 24' max. C |
| Overall | 35' max. D |
| Accessory Structure(s) | |
| Accessory Dwellings | 2 stories max. |
| Other | 1 story max. |
| Ground Floor Finish Level | 18" min. |
| above Sidewalk | E |
| Ground Floor Ceiling | F |
| Service or Retail | 12' min. |
| Upper Floor(s) Ceiling | 8' min. G |
| Ground floor lobbies and common areas in multi-unit buildings may have a 0" to 6" ground floor finish level. | |
| Footprint | |
| Depth, Ground-Floor Space | 24' min. H |
| Accessory Structure(s) | |
| Width | 24' max. |
| Depth | 32' max. |
| Miscellaneous | |
| Loading docks, overhead doors, and other service entries shall be screened and not be located on primary street facades. | |

City of Cincinnati Form-Based Code
Final Draft 2/15/13
2-23
2-24
Final Draft 2/15/13
City of Cincinnati Form-Based Code

- **Affordability:** The City should allow four units by right. In addition, we strongly recommend the following:
 - Beyond the four units allowed by right, a developer should be able to receive as many bonus units affordable to households making 80% or less of MFI as they feel the market will bear, within the allowable building envelope of height, setbacks, and lot coverage. This will allow for the provision of the most deeply-affordable units that a developer feels it is possible to provide.
 - Single-family zones should NOT be held to a higher standard than buildings with 20 or more units, which can amortize their site acquisition costs over more units and are only required to provide 20% affordable units.
- **Scale:** Projects proposing at least four units should be eligible to build up to 0.9 FAR, 35 feet in height, and with a front setback of ten feet (to maximize the amount of private back yard area shared by residents). This will allow the market to best deliver products that meet the economic needs of our neighbors over the coming decades.

We believe that these adjustments to the RIP proposal will allow neighborhoods to determine their future destiny in terms of setting the terms of the character of future development, while

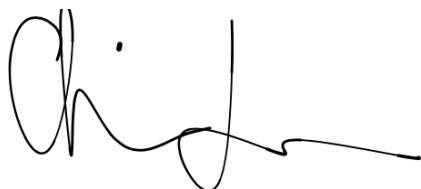
allowing for the diversity of housing types that must be built in order for supply to come into balance with the changing demographic demands of future generations.

We would also like to extend our support for the requirement that, for lots abutting an alley, access from the alley would be required when parking is provided, though parking would not be required for these lots. This will help to protect the pedestrian realm in those areas of our neighborhoods served by alleys.

Finally, a brief note regarding **narrow lot development**: The Concordia Neighborhood Association has previously fought against the development of skinny houses in our neighborhood. In fact, we appealed the approval of one such house all the way to the State Land Use Board of Appeals. We have also been subjected to many skinny houses built on streets with alleys, where the house nonetheless features a garage facing the street instead of the alley, making a mockery of statements in the Concordia Plan (developed as a part of the Albina Plan process) to preserve the pedestrian orientation of the front yard, and to minimize the impact of the automobile. We therefore are pleased to express our support for the new policies embodied in the staff proposal for the RIP with regards to narrow lot development, requiring that any parking be alley-fed, and that the height limit for skinny houses is proportionate to their width. We are encouraged that those of us who own a vacant 25' historically platted side lot will retain our ability to develop such a lot into a skinny house in the future without needing to demolish our primary home. We are also encouraged that, when a house is demolished in order to access the underlying historically-platted lots in an R5 zone, that the resulting two primary units will be required to be attached, so that the resulting structure will be more energy efficient and visually appealing.

With all of the work that has been put into developing the Residential Infill Project, we recommend making these minor changes to the RIP, including legalizing fourplexes as a by-right development type anywhere within the 'a' overlay, after which the City should give it a chance. Let's legalize true Missing Middle housing, in our neighborhoods. Let's run the experiment to see if the next generation of houses will produce more affordable and attractive outcomes than those currently being built.

Signed,

A handwritten signature in black ink, appearing to be 'Chris Lopez', with a stylized, flowing script.

Chris Lopez
Chair, Board of Directors
Concordia Neighborhood Association
P.O. Box 11194
Portland, OR 97211
landuse@concordiapdx.org



January 13, 2014

Planning & Sustainability Commission
1900 SW 4th Avenue
Portland, OR 97201-5380
psc@portlandoregon.gov

RE: Comprehensive Plan Testimony

(via postal and electronic mail)

Dear Planning & Sustainability Commission:

I write on behalf of the Concordia Neighborhood Association (“CNA”) to provide testimony regarding the proposed draft of the Portland Comprehensive Plan. The CNA appreciates the hard work by City staff and community stakeholders to create a thoughtful vision for Portland’s future. The draft Plan articulates a set of policies that point in a direction that may serve our community well through the coming years. However, we believe that the draft Plan could be improved in several ways, as discussed below.

OVERVIEW

The CNA values this comprehensive planning process as a once-in-a-generation opportunity to address concerns shared citywide by many neighborhood associations and individual citizens. Some specific concerns bear highlighting:

Residential Demolitions:

New planning guidelines should discourage unnecessary demolitions of single-family homes and encourage preservation of dwellings and other buildings where feasible. At present, demolitions in Concordia are typically no longer just replacing dilapidated dwellings or filling in previously-vacant full-size lots. Instead, new construction is replacing older, generally sound homes that tend to be affordable to median-income households, with much larger single-family homes that tend to be unaffordable to all but the highest-income households within our neighborhood. This trend is slowly chipping away at the historically affordable housing stock

within our neighborhood, is environmentally destructive, and does little or nothing to contribute to density.

The Plan should adopt policies to favor preservation and renovation over demolition where feasible. Demolition should be a tool of last resort, deployed only when the existing structure has reached the end of its useful lifespan.

“Flats” in Single-Family Zones Served by High-Quality Transit

To ensure that it is economically feasible to build new units affordable to median-income households, the Plan should allow for multiple dwelling units within structures that otherwise meet the form requirements for single family homes. The City should implement and enforce these policies through changes to its building and zoning codes.

Within the portions of the R5 and R2.5 zones served by high-quality transit service, a new overlay zone should be created, whose boundaries would be reviewed and edited by neighborhood associations prior to finalization. This overlay zone would allow for multiple residential units, up to two per floor, in structures that otherwise met the guidelines for single-family structures. This transition in the code, from a strict focus on density towards more of a form-based code, would place the emphasis on minimum lot size, maximum lot coverage, building setbacks, height, protection of existing mature trees, and other issues relevant to neighborhood livability.

All new development should comply with Community Design Standards

To ensure that the character of our communities is maintained and respected, the City’s Community Design Standards should be required for all new projects, including all new construction and all remodels requiring permits; all such projects that are not able to comply with Community Design Standards shall be subject to Design Review. By-right development of projects that do not meet Community Design Standards should no longer be an option.

RECOMMENDATIONS ON SPECIFIC POLICIES PROPOSED IN THE DRAFT PLAN:

Page GP3-14:

“Freight Corridors

Freight Corridors are the primary routes into and through the city that supports Portland as an important West Coast hub and a gateway for international and domestic trade. ~~While the forms of These streets are not expected to change significantly, they are integral to the growth of traded sector businesses such as manufacturing, warehousing and distribution industries.”~~ *In some cases, they may need to be upgraded to allow all modes to access destinations along the corridor, including employees and customers using bicycle and pedestrian modes or transit.*

CNA Concern: Freight Corridors must still allow employees and customers to access businesses and other destinations along the corridor safely using all modes, including bicycles and pedestrians, not just trucks and automobiles. This is an equity issue, and one that will become absolutely relevant if the city has any hope of meeting its future mode split targets.

- **CNA Recommendation:** One way to change the language to reflect this may be to strike the words “While the forms of” and “not expected to change significantly, they”, and to insert an additional sentence that acknowledges that these corridors may, in fact, have to change significantly in order to safely accommodate multi-modal access in the future. These suggested edits are shown above.

Page GP3-16:

“City Greenways

City Greenways are a network that includes the following types of infrastructure:

...

4. Neighborhood greenways are an extensive network of streets with low volumes of *local access only* motor vehicle traffic that are prioritized for bicycles and pedestrians, working in conjunction with the rest of the City Greenways system to extend the system into all neighborhoods.”

CNA Concern: The city needs to enact a specific policy for neighborhood greenways that specifies that motor vehicles are guests only on these streets, and indeed that they are open to motorized vehicles for local access only. This needs to be implemented by installing traffic diverters at intersections between greenways and arterials, as well as traffic diverters that are spaced between 2 and 10 blocks apart between arterials along neighborhood greenways (where the grid is intact). These diverters would allow bicycles & pedestrians to continue, but force motorized vehicles to turn and find another route (where a reasonable parallel route exists). Specific traffic diverter locations and styles should be chosen in a context-sensitive manner, in coordination with local neighborhood and business associations.

- **CNA Recommendation:** Add language to this policy statement that specifies that neighborhood greenways are open to motor vehicle traffic for local access only, as shown in the edits above.

Page GP3-17:

“Employment Areas

Industrial Districts – Industrial districts are in the low, flat areas along Portland Harbor and the Columbia Corridor, Oregon’s freight infrastructure hub. The manufacturing and distribution sectors concentrate here. *Though in the past* they typically *have* needed

one-story buildings, medium to large sites, and locations buffered from housing, *in the future these areas are expected to become more inclusive of multiple-story buildings containing a mix of complementary uses.* There is also an industrial district in the Central Eastside and smaller industrial areas scattered around the city, mostly adjacent to major transportation hubs.”

CNA Concern: Some language needs to be inserted to clarify that, while in the past (since World War 2), our industrial districts have been characterized by single-story buildings on large sites, in the future they will need to become more like industrial districts of the late 19th and early 20th century, with multiple-story buildings containing a mix of complementary uses. We have a shortage of industrial lands within city limits, so those lands that are already zoned for industrial should see an intensification of uses. Additionally, we should double down on our efforts to reclaim appropriate brownfield sites as future industrial land development opportunity areas.

- **CNA Recommendation:** Modify this policy statement to specifically state that industrial lands are expected to see an intensification of uses in the future. Potential language to accomplish this goal is shown above.

Page GP3-22:

“Policy 3.77: Inner Neighborhoods street patterns. Preserve the area’s urban fabric of compact blocks and its highly interconnected grid of streets, *including alleys where they exist. Where alleys do exist, do not allow new curb cuts on streets – require property auto access to off-street parking only from the alley, to protect the pedestrian environment on the sidewalk and preserve the neighborhood alley infrastructure.*”

CNA Concern: Alleys need special mention within these policies, as they have been neglected by City policy for too many years. New development must use alleys to provide auto access to properties where alleys exist, even if this means making modest improvements to the alleys.

- **CNA Recommendation:** Add language that requires all development on lots served by alleys, to provide auto access to the property from the alley. Potential language to accomplish this goal is shown in the edits above.

“Policy 3.79: Inner Neighborhoods infill. Fill gaps in the urban fabric through infill development on vacant and underutilized sites, and re-use of historic buildings on adopted inventories. Integrate new development into these districts’ historic development patterns.” *Ensure that development preserves and incorporates, rather than removes, mature trees.*

CNA Concern: Mature trees merit special consideration as something that new development should seek to preserve. The Concordia neighborhood has

lost over 20 mature, old-growth trees due to development in the past year alone. These century-old trees provide carbon sequestration and habitat benefits that are not included in development pro-formas. Their removal imposes negative externalities on the neighborhood, including its ecology. It is apparently too easy currently for a developer to remove mature trees without having to pay for the true cost, including quantified externalities, associated with their removal.

- *CNA Recommendation:* Add stronger language to protect mature trees. An example of potential language to accomplish this goal is shown in the edits above.

Page GP4-6:

“Policy 4.11: Alleys. ~~Encourage~~ *Require* the continued use of alleys for parking access, *where they exist*, and expand their use as the location of accessory dwelling units and as multi-purpose community space.”

CNA Concern: This policy is great, except that it needs to be mandatory in order to be effective where alleys do exist. What the City needs, at this point, is a concerted effort to revitalize its alleys, especially in areas where they have long experienced neglect, to allow them to become viable locations to construct accessory dwelling units and serve other community needs.

- *CNA Recommendation:* Insert stronger language into this policy statement, making it clear that development shall be required to use existing alleys, where they exist, to provide automobile access to properties. Potential language to accomplish this task is shown in the edits above.

“Policy 4.12: Adaptable neighborhoods. Encourage more housing choices to accommodate a wider diversity of family sizes, incomes, and ages. Allow adaptive reuse of existing buildings and the creation of *detached* accessory dwelling units to serve the changing needs of a household over time.” *Allow structures to be built in single family detached zones that meet height, setback, site coverage and minimum lot size requirements for single-family structures (and otherwise are visually similar to single-family homes), but that contain multiple units stacked vertically (“flats”), in zones served by high-quality transit.*

CNA Concern: Create a new policy to allow flats to be built in single-family neighborhoods. There is currently a lot of anger within the neighborhoods of Portland over the home demolition epidemic. People feel that they are being subjected to the stress of demolitions, of losing affordable housing stock within the neighborhood, without seeing any potential benefit. Currently, affordable homes are being demolished to construct homes that are only affordable to higher-income households, without doing anything to help with the supply of affordable housing. At least within the Concordia neighborhood,

neighbors would rather have the new larger structure that is built following a demolition be full of perhaps three flats, each affordable to a middle-income household, rather than one single expensive home. This would aid in the supply of affordable housing within the neighborhood, reduce pressure on the UGB, increase the supply of customers for neighborhood businesses, and generally help to meet community goals and needs.

- *CNA Recommendation:* Insert language that allows structures in single-family zones in areas served by high-quality transit to contain multiple units, as long as the building envelope meets the requirements for those zones in terms of height, setbacks, lot coverage, etc. Some potential language to accomplish this goal is shown in the edits above.

Page GP4-7:

“Policy 4.13: Scale and patterns. Encourage design and development that complements the general scale, character, and natural landscape features of neighborhoods. Consider building forms, scale, street frontage relationships, setbacks, open space patterns, and landscaping. Allow a range of architectural styles and expression, and respect existing entitlements.” *Remove strict restrictions on dwelling units per structure in transit zones.*

CNA Concern: Current zoning codes are too restrictive on development, and often impose artificial limits on density that are based primarily on the number of dwelling units. Rather than focusing on the number of dwelling units, codes should focus on the form of development, the height of the structure, treatment of existing mature trees on the site, the relationship to the street, and the relationship to adjacent structures. Because the number of dwelling units is itself a function of the size of each unit as much as anything else, developers and property owners should be given more freedom to size each unit as they see fit, as long as they meet code requirements for the form of the building.

- *CNA Recommendation:* Insert language into Policy 4.13 that allows for the removal of restrictions on dwelling units per structure within transit zones. One possible way to do so is shown in the edits above. It may be preferable to use FAR, or simply height and lot coverage, as the mechanisms through which building size is regulated between different zones.

“Policy 4.16: Street environment. Encourage development in centers and corridors to include amenities that create a pedestrian-oriented environment and provide places for people to sit, spend time, and gather.” *Buildings should have awnings to provide shade and protection from the rain for pedestrians and other users of sidewalk space.*

CNA Concern: Awnings should be specifically called out as something that should be provided in pedestrian corridors. Too many buildings do not include awnings, probably because modern architecture often fails to recognize their functional value. The code must thus compensate for this architectural fad, and require buildings in centers and corridors to provide awnings.

- *CNA Recommendation:* Insert language requiring buildings to provide awnings within the pedestrian districts of centers and corridors. Some potential such language is shown in the edits to Policy 4.16, above.

“Policy 4.20: Residential uses on busy streets. Improve the livability of places and streets with high motor vehicle volumes. Encourage landscaped front setbacks, street trees, and other design approaches to buffer residents from street traffic.” *Prevent new single-use single-family houses in commercial retail zones. Require a ground floor use that contributes to a retail-oriented pedestrian environment, such as ground-floor retail space.*

CNA Concern: There have been too many instances in recent years of new development on our neighborhood main streets, such as Alberta and Belmont streets, that is purely residential. This creates “dead zones” on these streets. New development should seek to prevent the production of more such “dead zones” by requiring ground-floor uses that are compatible with the intent of a retail mixed-use pedestrian environment.

- *CNA Recommendation:* Insert language requiring ground-floor retail or similar uses in development in the pedestrian zones of centers and corridors. Some potential language to accomplish this is shown in the edits to Policy 4.20, above.

Page GP4-8:

“Policy 4.21: Natural features and green infrastructure in centers and corridors. Integrate natural and green infrastructure, such as street trees, green spaces, ecoroofs, *living walls*, gardens, and vegetated stormwater management systems, into centers and corridors.”

CNA Concern: Living walls are quickly becoming popular as a way to provide greenery on buildings, to prevent graffiti, and to enhance livability. Living walls should be added to the list of green infrastructure to seek in centers and corridors.

- *CNA Recommendation:* Add living walls to the list of green infrastructure features recommended for centers and corridors, as shown in the edits to Policy 4.21, above.

Page GP4-9:

New Policy Suggested, Perhaps Policy 4.28h: Air Quality Impacts of Airports.

Air quality emissions from airports, including Portland International Airport, shall be reduced, mitigated, and eventually eliminated.

CNA Concern: There appears to be no mention of the air quality impacts of the airport, yet maps of the air pollution plume from the airport show that it extends deep into Northeast Portland. The City thus needs to have a policy to reduce, mitigate, and eventually eliminate the air quality impacts from the airport, in order to protect the health of its residents, especially those most vulnerable to the impacts of air pollution. Certainly, by 2035, this should be an achievable goal. A new policy in this section might be the best way to address this need.

- **CNA Recommendation:** Add a new policy, perhaps 4.28h (as shown above), to specify that the City has a long-term goal of eliminating negative air quality impacts from airports on adjacent neighborhoods, and a short-term goal of reducing and mitigating those impacts.

“Policy 4.52: Water use efficiency. Encourage site and building designs that make efficient use of water and manage stormwater as a resource.” *Encourage the re-use of graywater from showers, sinks, kitchens, and laundry for landscape irrigation, especially for permaculture.*

CNA Concern: Graywater does not appear to be specifically addressed anywhere in this draft of the Comp Plan, so this may be the most appropriate place to insert a reference to it. Given our increasingly long summertime droughts in Portland, graywater makes sense as a way to re-use water to reduce water consumption for landscape irrigation purposes. It can be used untreated in completely underground applications, or it can be treated and re-used for other purposes.

- **CNA Recommendation:** Add a new sentence to Policy 4.52 that clarifies City support, as a matter of policy, for the re-use of graywater from showers, baths, sinks, kitchens, and laundry. Establish policies to encourage the responsible installation and use of graywater systems within the City.

Page GP4-14:

“Policy 4.63: Urban heat islands. Encourage development, building, *landscaping, tree planting*, and infrastructure design that reduces urban heat island effects.”

CNA Concern: This section on urban heat islands seems to read as if technological fixes are preferred to help reduce the urban heat island effect. The most cost-effective solutions may indeed be the simplest, however: plant more trees and perennial shrubs. At the very least, a nod in this direction could be added by inserting the word “landscaping” into this list.

- *CNA Recommendation:* Add the planting of trees and landscaping to the lists of solutions to reduce the urban heat island effect. Work to establish City policies that encourage wider adoption of permaculture practices that reduce the Urban Heat Island effect and sequester additional atmospheric carbon on a long-term basis. This could be done by modifying Policy 4.63, as shown above.

New Policy Suggested, perhaps 4.69? Organic Practices Within City Limits. *Within the City of Portland, all lands and buildings shall be managed under a standard that is equivalent to Oregon Tilth certification. This shall include banning within city limits and on all lands owned and/or managed by the city, all pesticides, herbicides, insecticides, fertilizers, etc. that are not approved for use by Oregon Tilth, except for in cases of extreme urgency (such as, if it were to be otherwise prohibited, to inoculate Dutch Elm trees against Dutch Elm Disease). Doing so will encourage the restoration of wildlife habitat, protect endangered fish and wildlife populations, protect threatened bee populations, and protect the health of human and other living inhabitants of the city.*

CNA Concern: To protect the health of humans and other inhabitants of our city, Portland should seek to be managed according to standards that could be certified as organic by Oregon Tilth. This policy is expected to save money for those following it, and to have positive impacts on the health and economy of the City and its residents and businesses. This policy should apply to all lands, public and private, within or controlled by the City of Portland.

- *CNA Recommendation:* A new policy should be created to this effect, based on language such as that above.

New Policy Suggested, perhaps inserted after 5.36? Multiple Dwelling Units in Single Family Zones. *Encourage the development of flats in single-family neighborhoods within high-quality transit zones, that is, vertically separated multiple housing units within buildings that otherwise resemble single-family homes and comply with single-family zone requirements related to height, setback, lot coverage, and minimum lot size.*

CNA Concern: A new policy should be created to specifically legalize “flats” in single-family neighborhoods (R5 and R2.5 zones), where multiple vertically separated housing units are housed within structures that otherwise appear to be single-family homes and meet all of the zoning regulations for single-family zones except those relating to number of units.

- *CNA Recommendation:* A new policy should be created to allow for multiple dwelling units within each dwelling structure in single-family zones, based on language such as that above. This policy should allow for a new overlay zone to be created and applied within the portions of the R5 and R2.5 zones that overlap with high-quality transit zones, as defined by the City for the purposes of allowing multifamily development with no or reduced off-street parking. The resulting

overlay zone map should be shown to neighborhoods prior to final adoption, for the purposes of collecting input and revising the boundaries of the overlay zone based on input from neighborhood associations. This policy could be written as shown in the suggested text above.

Page GP6-10:

“Policy 6.23: Trade and freight hub. Encourage investment in transportation systems and services that will retain and expand Portland’s competitive position as a West Coast trade gateway and freight distribution hub, *while transitioning towards a goal of net zero emissions in this sector.*”

CNA Concern: While it is good for the economy for Portland to be a trade and freight hub, it is bad for the environment and for the health of the population. As such, the City needs to establish a goal to move towards net zero emissions for the traded sectors and freight/goods movement. Setting this goal now will allow predictability for businesses in the future, so they can work with the City to achieve this goal over the course of multiple decades.

- **CNA Recommendation:** Adopt a policy goal of net zero emissions from the trade and freight sectors of the economy by the plan horizon year. This could be done by modifying Policy 6.23, as shown above.

Page GP6-17:

“Policy 6.59: Neighborhood business districts. Provide for the growth, economic equity, and vitality of neighborhood business districts (Figure 6-3). *Eliminate “by right” single family development in commercial or mixed use zones; require all new development to provide ground-floor space for uses (such as retail) that support the retail-oriented pedestrian environment within neighborhood business districts.*”

CNA Concern: Some language should be inserted here to clarify that, indeed, for neighborhood business districts to survive and thrive, they must be districts for business. Space must thus be allocated specifically for supportive uses, and new single-family (or other) development that does not acknowledge the need to provide this space, especially on the ground floor, must be prohibited.

- **CNA Recommendation:** Adopt a policy requiring ground-floor commercial space (or others uses that support the retail-oriented pedestrian environment) in all new development in centers and corridors, eliminating “by right” single family development in these areas. This could be done by modifying Policy 6.59, as shown above.

Page GP7-14:

“Policy 7.48: Connected upland and river habitats. Enhance habitat quality and connectivity between the Willamette riverfront and upland natural resource areas.”
Daylight creeks through urban areas; use these creeks as the centers of habitat corridors.

CNA Concern: Daylighting can be an effective strategy to not just connect streams to rivers, but also to connect upland to lowland habitats along new (restored) habitat corridors.

- **CNA Recommendation:** Adopt a policy supportive of daylighting creeks that are currently in underground culverts. This could be done by modifying the test of Policy 7.48, as shown above.

Page GP8-13:

“Policy 8.29: Resource efficiency. Reduce the energy and resource use, waste, and carbon emissions from facilities necessary to serve designated land uses.” *Public facilities will have net zero carbon emissions from fleets, buildings, and other emissions sources.*

CNA Concern: The current language of Policy 8.29 is very vague, and needs to have stronger language with specific desired outcomes. An achievable policy goal would be net-zero carbon emissions from City vehicles and properties, especially by the plan’s horizon year of 2035. Setting such a goal would place Portland at the vanguard of cities willing to do something tangible about climate change; it would also come with a host of co-benefits for Portlanders, including better public health outcomes.

- **CNA Recommendation:** Adopt a policy requiring the City of Portland to produce net zero carbon emissions from public facilities by the Plan’s horizon year. This could be done by modifying the test of Policy 8.29, as shown above.

Page GP8-15:

“Policy 8.42: Undergrounding. ~~Encourage~~ *Require* undergrounding of electrical and telecommunications facilities within public rights-of-way, especially in Centers and along corridors where multi-story development is allowed.” *Work with utilities to achieve undergrounding whenever the street is opened, and encourage further undergrounding in single-family neighborhoods.*

CNA Concern: The current language of Policy 8.42 is a bit vague and could have more teeth. For a variety of reasons, including resiliency, undergrounding would be a good citywide policy, but it won’t happen without effort. Requiring undergrounding, and having a policy to accomplish it block-by-block whenever the street is opened, would make it feasible to actually accomplish this goal within our lifetimes. New drilling and

installation technologies allow for undergrounding to occur at a cost far cheaper than was previously available. Whenever a street is opened, in Centers and Corridors overhead utilities on that block should be undergrounded as a matter of policy, and within other areas of the City the option to underground overhead utilities on that block should be offered to all property owners at the most economical cost achievable.

- *CNA Recommendation:* Adopt a policy encouraging or requiring the undergrounding of overhead utilities within the City of Portland, as appropriate, whenever other work requires the opening of the street. This could be done by modifying the test of Policy 8.42, as shown above.

“Policy 8.43: Right-of-way vacations. Adopt and maintain City code that identifies when street vacations are appropriate. That code should:

- Maintain existing rights-of-way unless there is no existing or future need for them.
- Require pedestrian or bicycle facilities, if ~~needed~~ *the ROW serves or could serve as a connection in the neighborhood pedestrian and/or bicycle network.*”

CNA Concern: Because the word “need” can be taken different ways by different people, it should be clarified: if a particular ROW does or could serve as a link in the local pedestrian/bicycle network, then pedestrian/bicycle facilities shall be required, and the ROW shall not be vacated.

- *CNA Recommendation:* Adopt a policy relating to street vacations that strongly favors not vacating any street that serves or could serve as a link in the surrounding area’s bicycle and/or pedestrian network, as shown in the above modifications to Policy 8.43.

Page GP8-16:

“Policy 8.49: Pollution prevention. Reduce the need for wastewater treatment capacity through land use programs and public facility investments that manage pollution as close to its source as practical and that reduce the amount of pollution entering the sanitary system.” *Encourage the development of on-site graywater systems for landscape irrigation during the dry season (or for other re-use purposes if treated on-site).*

CNA Concern: Graywater, or the re-use of water from kitchen, laundry, sinks, showers, baths, and most other domestic wastewater sources except toilets, has a huge potential to reduce water consumption in Portland during the dry season. It should be specifically encouraged as City Policy, encoded in the Comprehensive Plan. The City should cooperate with other partners to develop a graywater program that educates property owners as to the

responsible installation, maintenance and operation of graywater systems, including what substances and products can and cannot be used in conjunction with an active graywater system.

- *CNA Recommendation:* Adopt a policy encouraging the use of graywater systems, where appropriate, within the City of Portland. The edits to Policy 8.49, as shown above, are intended to support the accomplishment of this goal.

Page GP8-18:

“Policy 8.66: Storage. Provide sufficient in-city water storage capacity to serve designated land uses, meet demand fluctuations, maintain system pressure, and ensure supply reliability, *even during extended drought periods.*”

CNA Concern: Many residents are concerned that, with the closure and proposed closure of many of the City’s open-air water reservoirs, that the door is being closed on water storage capacity that could be crucial in the future as climate change brings longer, drier summertime drought conditions to our region. The City should, as a matter of policy, ensure that it has adequate water storage capacity to allow adequate supply even during the most long-lasting, extreme drought conditions, without having to resort to groundwater pumping (which should only be a strategy of very last resort).

- *CNA Recommendation:* Adopt a policy requiring the City of Portland to provide enough water storage capacity to allow the City to ensure supply reliability without needing to support to groundwater pumping, even during extended drought periods. The edits to Policy 8.66, as shown above, are intended to support the accomplishment of this goal.

Page GP8-23:

New Policy, perhaps 8.105? Sustainable Energy Production. *Maximize opportunities to produce sustainable energy within the city, especially on city-owned facilities, through solar, wind, hydro, geothermal and other renewable energy production technologies.*

CNA Concern: The City should be actively seeking to produce sustainable energy on buildings, facilities, and lands that it owns or controls. The current power portfolio of the City’s power sources is weighted currently very heavily to fossil fuels; one way to make this portfolio more renewable is for the City itself to begin generating more sustainable energy. Doing so could have direct financial, environmental, and economic benefits for the City.

- *CNA Recommendation:* Adopt a policy requiring the City of Portland to maximize the production of sustainable energy on lands and facilities that it owns or controls, while reasonably balancing this policy goal

against other competing needs and interests for those lands and facilities. Some potential policy language to accomplish this goal is shown above, as a suggested new Policy 8.105.

Page GP9-8:

“Policy 9.15: Repurposing street space. Encourage repurposing ~~street segments~~ *portions of street Rights-Of-Way* that are not critical for transportation connectivity to other community purposes.”

CNA Concern: The existing language in this policy seems to support removing links from the transportation network. Rarely, aside from cul-de-sacs that don’t actually front on properties with driveways, would it be possible to find links in the transportation network that couldn’t possibly be used, even by bicyclists or pedestrians. This language should thus not refer to street “segments” but instead to street “areas.” It is eminently practical to seek to shrink the transportation footprint by reducing the amount of street rights-of-way (ROW) that is paved and dedicated to vehicle movement. Portions of the ROW can easily be converted to use by non-auto modes, as greenspace, as bioswales, and/or as community space. This policy should support those sorts of activities, not the removal of potential links in the transportation network, especially those which may already by their nature be more suited to pedestrians and bicycles than other vehicles.

- **CNA Recommendation:** Modify Policy 9.15, as shown above, to clarify that the City seeks to re-purpose under-used portions of the street Right-Of-Way to allow them to find their highest and best use; but that the City has no interest in closing any existing or potential links in its pedestrian and/or bicycle networks.

Page GP9-9:

“Policy 9.21: Bicycle transportation. Create conditions that make bicycling more attractive than driving for most trips of approximately ~~three~~ *five* miles or less.”

CNA Concern: The City of Portland is aiming too low with this policy. If the City truly seeks to gain bicycle mode share deep into the double-digits, it should seek to make bicycling more attractive than driving for most trips of approximately *five* miles or less. This radius allows most of inner Portland to find trips to and from downtown to be more attractive trips by bicycle than by auto. This doesn’t seem to be a difficult standard to achieve, as long as the City is willing to make the choices required to devote the necessary portions of the ROW to bicycles, especially on the main arterials that connect downtown to the neighborhoods, and within downtown.

- **CNA Recommendation:** Modify Policy 9.21, as shown above, to clarify that the City seeks to create conditions to make bicycling more

attractive than driving for most trips of approximately *five* miles or less.

Page GP9-10:

“Policy 9.29: Intercity passenger service. Coordinate planning and project development to *create/expand electric rail* intercity passenger transportation services in the Willamette Valley, ~~and~~ from Portland to Seattle and Vancouver, BC, *and from Portland to nearby cities including Hood River, The Dalles, Bend via Mt. Hood, and destinations on the Oregon Coast including Astoria to Tillamook.*”

CNA Concern: The City should seek stronger, carbon-neutral passenger transportation connections to more of its hinterlands. Electric interurban/intercity passenger rail service should be planned to connect Portland to Eugene (and points south), the Oregon Coast including Astoria to Tillamook (and possibly points south), the Columbia Gorge including Hood River and the Dalles (and possibly points east), Bend and Central Oregon via Mt. Hood, as well as points to the north, including Vancouver (WA), Olympia, Seattle, and Vancouver, BC.

- **CNA Recommendation:** Modify Policy 9.29, as shown above, to clarify that the City seeks to become the epicenter of an electric interurban passenger rail network that connects it via a rapid carbon-neutral mode of transportation (that offers better travel times than are available currently from road-based transportation modes) to the major population and destination centers of its hinterlands that it is currently connected to via the road network.

“Policy 9.32: Multimodal system and hub. Maintain Portland’s role as a multimodal hub for global and regional movement of goods. Enhance Portland’s network of multimodal freight corridors.” *Seek ways to achieve net zero emissions from freight movement.*

CNA Concern: While it is important for Portland to maintain its role as a multimodal freight hub, the technologies currently involved are some of the dirtiest sources of air pollution in the entire region, and their pollution plume extends deep into adjacent residential neighborhoods. The City, at the very least as a matter of risk management, should therefore seek to enforce a zero emission goal on the multimodal freight hub portions of the economy. This could involve electrifying the entire regional freight rail network, transitioning trucks to hybrid biodiesel/electric vehicles, and other technological paths that could not only lead to reduced emissions but also reduced operating costs and additional jobs in the local green economy.

- **CNA Recommendation:** Modify Policy 9.32, as shown above, to clarify that the City seeks to achieve net zero emissions from freight movement.

Page GP9-11:

“Policy 9.35: Freight rail network. Coordinate with stakeholders and regional partners to support continued reinvestment in, and modernization of, the freight rail network, *including electrification and double-tracking to accommodate passenger rail growth where feasible and eliminate emissions from freight rail activities.*”

CNA Concern: While growing and modernizing the regional freight rail network is certainly a laudable goal, the City should be more specific about the sought improvements: electrify the system, and create additional capacity to allow freight to peacefully co-operate with passenger rail expansion on the same corridors. Other goals may include seeking to move some freight rail yard operations away from the river, where they may no longer represent the best and highest use of those lands (as has already happened at the north end of the Pearl District.)

- **CNA Recommendation:** Modify Policy 9.35, as shown above, to clarify that the City seeks to electrify its regional rail network, and double-track it where necessary to allow for the co-existence of both freight and passenger rail operations in a manner that allows both to maintain their growing schedules.

“Policy 9.37: Portland International Airport. Maintain the Portland International Airport as an important regional, national, and international transportation hub serving the bi-state economy.” *Seek ways to reduce airport air pollution emissions and to achieve net zero airport-area emissions by the Plan horizon year.*

CNA Concern: The air pollution plume from Portland International Airport currently extends deep into the residential neighborhoods of NE Portland, in a manner that is unacceptable for the long-term health of residents. The City should thus seek a long-term goal of zero emissions from the Portland Airport, and work with partners there to achieve that goal. Future technological advances, including hydrogen fueled aircraft, could allow this to become a reality within the life of the Comprehensive Plan.

- **CNA Recommendation:** Modify Policy 9.37, as shown above, to clarify that the City seeks to reduce emissions from Portland International Airport and surrounding, related facilities to a mitigated net of zero by 2035.

Page GP9-13:

“Policy 9.52: Share space and resources. Encourage the shared use of parking and vehicles to maximize the efficient use of limited urban space, *both on and off street.*”

CNA Concern: In order for the City to meet some of the goals mentioned elsewhere in this document, real estate that is currently dedicated to vehicle storage will need to find a higher and better use in the future, no matter where it is located – on street or off street. This policy should clarify that it applies to both situations.

- **CNA Recommendation:** Modify Policy 9.52, as shown above, to clarify that the City seeks to encourage the shared use of both on- and off-street parking.

Page GP10-9:

“Policy 9.52: 6. Single-Dwelling — 5,000

This designation is Portland’s most common pattern of single-dwelling development, particularly in the city’s inner neighborhoods. It is intended for areas near, in, and along centers and corridors where urban public services, generally including complete local street networks and access to frequent transit, are available or planned. Areas within this designation generally have few or very limited development constraints. Single-dwelling ~~structure~~ residential will be the primary use. The maximum density is generally 8.7 units per acre, *except where an overlay zone allows up to 8.7 primary structures per acre, where each structure may have up to two dwelling units per floor.* The corresponding zone is R5.”

CNA Concern: While the R5 zone is intended for areas near, in, and along centers and corridors with access to frequent transit, this language focuses too much on density rather than form. Especially beginning with this zone and continuing into the higher-density residential zones, Portland should transition to more of a form-based code, one which focuses on minimum site size, maximum lot coverage, setbacks, height, protection of existing mature trees, and other issues relevant to neighborhood livability. The code should transition away from a strict focus on density, which can often be counter-productive towards achieving other livability-related goals, including affordable housing and achieving the critical mass of neighborhood population required to support the services of commercial centers within a 20-minute walk.

- **CNA Recommendation:** Modify the definition of the R5 zone, as shown above, to clarify that the focus, especially within high-quality transit zones, is on primary structures per acre, rather than dwelling units per acre, and that up to two dwelling units are allowed per floor of the structure (including basements and attics) in these areas.

RECOMMENDATIONS NOT CORRESPONDING TO SPECIFIC POLICIES PROPOSED IN THE DRAFT PLAN:

Comprehensive Plan Testimony

January 13, 2015

Community Design Standards Should Apply Everywhere. All new development, construction, or remodels requiring permits, shall comply with either Community Design Standards or be approved via the Design Review process.

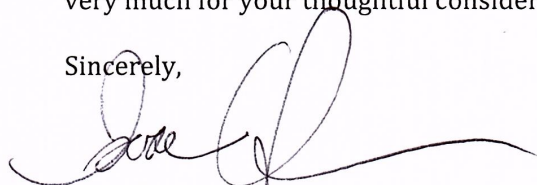
CNA Concern: To ensure that the character of our communities is maintained and respected, the City's Community Design Standards should be required for all new projects, including all new construction and all remodels requiring permits; all such projects that are not able to comply with Community Design Standards shall be subject to Design Review. By-right development of projects that do not meet Community Design Standards should no longer be an option.

- **CNA Recommendation:** Modify the Zoning Code to clarify that all new construction requiring permits within the City shall either comply with Community Design Standards, or be approved via the Design Review process.

The CNA encourages the City to incorporate our recommendations into the Comprehensive Plan and to follow through with actionable and enforceable policies for future growth and development.

Please feel free to contact me, or the Chair of our Land Use & Transportation Committee, Garlynn Woodsong, at (503)-936-9873 or at garlynn@gmail.com, should you have any questions about any of the comments in this letter. Thank you very much for your thoughtful consideration of our input.

Sincerely,



Isaac Quintero
Chair, Concordia Neighborhood Association Board of Directors
Concordia Neighborhood Association
c/o NE Coalition of Neighborhoods
4815 NE 7th Avenue
Portland, OR 97211

cc: Mayor Charlie Hales, mayorcharliehales@portlandoregon.gov
Commissioner Amanda Fritz, Amanda@portlandoregon.gov
Commissioner Nick Fish, nick@portlandoregon.gov
Commissioner Steve Novick, novick@portlandoregon.gov
Commissioner Dan Saltzman, dan@portlandoregon.gov
BPS Director Susan Anderson, Susan.Anderson@portlandoregon.gov



Concordia Neighborhood Association
 P.O. Box 11194
 Portland, OR 97211
landuse@concordiapdx.org

Re: Residential Infill Project

September 19th, 2016

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

Mayor Charlie Hales, mayorcharliehales@portlandoregon.gov
 Commissioner Steve Novick, novick@portlandoregon.gov
 Commissioner Amanda Fritz, amanda@portlandoregon.gov
 Commissioner Nick Fish, nick@portlandoregon.gov
 Commissioner Dan Saltzman, dan@portlandoregon.gov

Dear Council Members,

The City is at a crossroads. Our single family residential zones contain homes that have ceased to become affordable to the average Portland family. Demolitions in these zones mostly demolish smaller, older homes to construct larger, new single-family homes, as developers seek to increase the number of square footage to multiply by the cost per square foot of comparable nearby homes in order to make their profit from each deal. This results in more and more large, expensive homes that aren't affordable to most of the families who might be able to fully use their space, and generally are purchased by people of means who don't actually need all that space. Supply, in short, is not meeting demand. The decision point we find ourselves at is this: do we allow this situation to continue and worsen, or do we take steps to fix it?

After reviewing the staff proposal from the Residential Infill Project, as well as the Summary Report from the Stakeholder Advisory Committee, and the Portland For Everyone and United Neighborhoods for Reform platforms, we find that the Concordia Neighborhood Association can only fully endorse and support the Housing Diversity Perspective (the Majority Position) that was supported by the majority of the Stakeholder Advisory Committee. This proposal is the one that seems to make the boldest moves towards fixing the current supply and demand imbalance within our residential neighborhoods.

It is important for us to state that we agree with the spirit of the staff proposal, which we understand to be a grand compromise to reduce the scale of new development in single family neighborhoods in

exchange for allowing more Missing Middle housing types. Further, we support the efforts made by a wide range of community based groups to build a broad coalition of community members who favor this compromise and wish to see it implemented in all single family zones, not just those closest to centers and corridors.

However, we have an overriding belief that our neighborhoods should be regulated based on the form and scale of buildings, rather than limiting the number of units within a structure or on a lot by density regulations. Regulating based on form, rather than a numerical count of "units," will give the housing market the most freedom to respond to demand in the most appropriate manner for each time and place. This freedom will not only allow the market to react to the current housing shortage, but also to respond to whatever changes to market conditions that the future may bring.

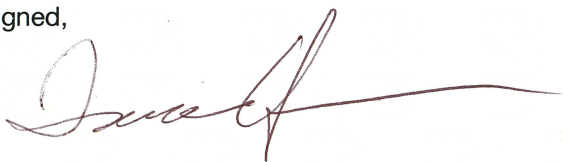
As the Housing Diversity Perspective is the only proposal that clearly states that form would be used to regulate the intensity of development, rather than density or a numerical cap on the number of units, this is the proposal that we endorse and encourage the City to adopt in the form of term sheets to guide code development over the coming year.

Our endorsement comes with three caveats:

- 1) In the R2.5 zone, minimum front setbacks shall be 10ft (15ft in R5), except where less is allowed due to the context of neighboring properties. The maximum allowable height in the R2.5 zone shall remain at 35 feet, with the height in the R5 zone remaining at 30 feet. The R2.5 zone is the transition zone between the lower-intensity R5 zone and adjacent centers and corridors; as such, it should have a more urban feel, including taller allowed heights, smaller allowed setbacks, and higher FARs.
- 2) Neighborhoods shall have the ability to work with City staff to devise and adopt, and have BDS regulate and oversee, neighborhood or area-specific design standards. This will allow neighborhoods to articulate their own vision for the character of development within their boundaries, and thus fine-tune elements of form for buildings developed there in order to incrementally achieve that vision.
- 3) We agree with the United Neighborhoods for Reform that the allowable FAR should be 0.9, not 0.5, in the R5 zone (and thus, it should be even higher in the R2.5 zone). This would allow for a full two-story house that covers 45% of a lot, which we understand to be the maximum allowable lot coverage.

With these caveats and adjustments, we feel strongly that the Housing Diversity Perspective will allow neighborhoods to determine their future destiny in terms of setting the terms of the character of future development, while allowing for the diversity of housing types that must be built in order for supply to come back into balance with the changing demographic demands of future generations.

Signed,



Isaac Quintero
Chair, Board of Directors

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Garlynn Woodsong

#83019 | January 15, 2020

Testimony to **Portland City Council** on the **Residential Infill Project, Recommended Draft**

Dear Mayor Wheeler and Commissioners Eudaly, Hardesty, and Fritz, Due to the holidays and our regular meeting schedule, we were not able to produce a new public comment letter for this latest round of comments on the Residential Infill Project (RIP). Luckily, this project has been going on for enough years, and our advocacy for the right to build new fourplexes to provide more housing diversity in our neighborhood has been going on for even longer. This means that we have plenty of letters that we have written on this topic over the years, which are all still relevant today. Reading them allows CNA's consistent policy requests on this matter to be tracked over time. Our position has not changed. We support the Residential Infill Project. We ask that you pass the proposal that is in front of you now, and adopt the RIP immediately. Too much time has elapsed, while residential demolitions of single family homes to be replaced by more single family homes continues in our neighborhood. BDS and PBOT continue to approve new curb cuts across sidewalks for lots served by alleys, when the RIP would require them to instead require applicants to provide automobile access from the alley where one exists. People continue to be displaced from our neighborhood, or prevented from having the opportunity to live here at all, by the continued lack of housing diversity amongst the new homes being brought to market here. All of this will begin to be remedied once RIP is adopted. The time to adopt is now. Once this first version of RIP is adopted, then we look forward to continuing to work with you to implement some of our other suggestions, such as specific design standards that vary between neighborhoods / pattern areas, and an affordability bonus that allows more units within each multi-unit house as well as a larger FAR allowance in exchange for making some of those homes affordable. Please adopt the RIP proposal now. Sincerely yours, Garlynn Woodsong Land Use & Transportation Committee Chair Concordia Neighborhood Association

Testimony is presented without formatting.

There are immense problems facing Portland, to say nothing of Oregon as a whole, related to housing and land use. As I'm sure you know, this past year saw a 10% increase in our state's homeless population. People are leaving the city, not because they want to, but because they can no longer afford to live here. I will say at the outset that I am not inherently opposed to duplexes, triplexes, and fourplexes in Portland on what were formally lots zoned single-family home. I would also like to note that it is not my neighborhood's "character," when that term is understood as a racialized code word, that I am concerned with protecting. My neighborhood is a multiracial working-class neighborhood and I would like it to stay that way. And I'm overjoyed that the city is finally doing something to mitigate the construction of monstrous maximum height, maximum square footage, maximum footprint, minimum setback luxury homes that sell for over a million dollars and are completely out-of-scale/out-of-price with nearby existing homes and are just plopped down amidst blocks of modest single-story houses in working- or middle-class neighborhoods (see, for one example among so very many, 1415 NE Going St, a particularly egregious instance of this that makes me physically ill every time I bike by it). This went on for way too long and I'm so glad it's potentially coming to an end. But I have some other concerns.

There's a grotesquely large, new construction single-family house going up one house down from mine, not right next door, but next to that one. (A photo is attached to this testimony, which clearly shows it looming over its neighbors.) This property used to be on one lot shared with the house that is next door to me and was split off when the house next to me was sold/flipped. The new construction going in is 4 bedrooms, 4 bathrooms, 2 1/2 stories, no basement, and extends in all directions as close to the property line as legally allowed, so, almost right up to neighboring fences. Some of these details not observable from the exterior, such as number of beds and baths, are gleaned from another neighbor, who saw the plans randomly one day while he was out walking his dogs and the developer happened to be there with the blueprints, otherwise I'd never know this information, since there is no requirement to inform neighbors. Why anyone needs four bathrooms in a single-family home I'll never know, to say nothing of four bedrooms, in this era of decreasing family size. I've shared a single-family home with as many as 9 other adults, and never had more than 1 1/2 baths. Every other house on this entire block, regardless of number of bedrooms, is single-story, modest footprint, modest square-footage. In fact, neighborhood-wide, there are few houses as large as this one, and likely none as tall. This design should *never* have been approved by the city. I never saw any plans for this new construction myself, was never informed about any of it, though it affects me. Why is that? If this were a duplex, triplex or fourplex I would not be opposed to the fact of it being a duplex+, but rather to, primarily, the total height and, secondarily, the footprint and square footage. Whoever buys this house will surely be far wealthier than anyone else around, and will not be bothered by that fact, nor by how their home looms over all of their new neighbors. How that will affect neighborhood dynamics and interpersonal interactions I can't say, but I'm not hopeful. I have also noticed that when this type of development goes in, it seems to encourage more of the same on the block/in the neighborhood, based on my anecdotal survey of demolitions and new construction, which I see a fair amount of up close since I bike for most of my transit and used to live in Boise-Eliot, a neighborhood that has been overrun with new construction. On the aforementioned block of NE Going between 14th and 15th, a corner house was recently for sale. It sold immediately and was then demolished very quickly, possibly to avoid the 1/20/2020 shift to a 1940-or-earlier construction date requiring deconstruction rather than demolition. Guess what's going up in its place? You think it'll be affordable? You know the answer to these questions.

I have lived in Portland since 2001, mostly in different North Portland neighborhoods, and have spent almost all of that time in group rental housing, which is—or was—quite common here: Multiple unrelated adults living in one rented single-family house. In mid-2017 I was no-cause evicted from my rental house of 8 years, where the landlord had promised me housing security for the rest of my life. I made life-altering decisions based on this promise, as one does, leaving one job for another, providing the landlord with countless hours of free labor maintaining the house and property, etc. I helped to create and maintain a large, productive vegetable/fruit garden, shared with many, to which I devoted more time and emotional energy than I could possibly tally and which I was forced to abruptly abandon. Most impactful, though, I didn't buy a house years earlier, though I had the means to do so financially, because I was promised housing security: I saw no reason to buy, when most of the benefits of owning a house, as I saw it, I already had. No-cause evictions still being legal at the time, I had 90 days to find another living situation—this after 2 years of 10% growth each year in the price of homes—and managed to find exactly *one* house I could (barely) afford to buy: East of 82nd, 1 bedroom, 680 square feet, ripped down to the studs inside by the previous owner. The only way I could buy it was with a FHA 203k Rehab Loan (research what that entails if you're curious about logistical/bureaucratic nightmares), and with the seller wanting to sell to a real person who actually wanted to remodel/live in the house longterm rather than any one of the four house flippers offering cash who would never live in the house, and just sell it at a profit. There was no city/state ordinance prohibiting or even dis-incentivizing selling to flippers at the time nor is there now; I just got lucky to find a seller willing to sell to a real person despite how tricky and time-consuming such a sale would be. I have no doubt that if the Residential Infill Project (RIP) guidelines had been implemented by then the house I now live in would have been demolished and a massive building put in its place. I've talked to other potential and actual homebuyers, on my economic level and above, and the competing-with-cash-offers thing is a BIG DEAL in Portland preventing folks from buying homes. RIP will exacerbate this widespread problem.

Over two years later I'm still working on the house. In fact, it's quite taken over my life and I've had to stop doing many of the things that made up my life before. I'm doing as much of the work as possible myself since I have no disposable income (I don't even come close to making double my mortgage, thus squarely situating me within that cost-burdened camp of 1/3 of Americans who spend more than 1/3 of their income on housing) and also work full-time. The quality of the work I'm doing on the house has nothing to do with maximizing profit while minimizing investment, which is, sadly, what house flippers do. On the contrary, I bought the house to have what had just been taken from me in the no-cause eviction—security, autonomy, space to grow food—not to turn a quick profit. The level of the work I'm doing, the quality, it just has nothing to do with contemporary, throw-away construction. The house was built in 1912 and I'm trying to keep the work to the quality of that era: long-lasting, sustainable, quality craftsmanship: stain-grade fir trim around windows and doors, solid wood custom cabinetry which I will build myself, using reclaimed materials when possible, etc. Outdoors I've ripped out useless, non-native shrubs, an unreal quantity of grass, and tilled soil by hand to put in a large, productive vegetable garden (fruit coming this spring), which supplies me with much of my produce year-round.

Given all that, what would happen if that 2 1/2 story maximum height, maximum footprint suburban-style 4-BR house got built just to the south or west of me instead of one house down? What would happen if that 30' tall house was a duplex or a triplex or a fourplex? Regardless of the number of units, I'd lose most—if not all—of my sun, and therefore could not grow food,

making my house worth nothing to me. But could I recoup my expenses in materials, labor, and emotional investment if I sold it? Nope. Not even close.

And what could I do about that? Exactly nothing. I would not ever be compensated for that loss. Not now and not under the new RIP guidelines.

And that's a huge problem, not only with RIP, but also with existing zoning regulations.

There would be no notification to me or any other nearby homeowner of the proposed development. No review process. No assessment of whether Portland (or the world) needs more maximum height, maximum square-footage, maximum footprint, minimal setback, 4-bed, 4-bath houses. No process by which such a house would be critiqued vis-a-vis the city's own stated sustainability/climate change goals. No consideration of the decreased emotional/psychological value of my home *to me*, (to say nothing of the loss of economic value), a home that is inarguably actually consistent with sustainability/climate change goals due to its small size and productive year-round food garden. No consideration of what it feels like to have a house loom over all its neighbors like a cruise ship docked amidst rowboats. It would hardly matter if this new construction was a single-family home or a duplex or triplex: I could care less about the number of units. Its negative impact would be the same. How do you talk to somebody who's looking down on you? I'd rather see two, three, or four tiny houses on that lot than that hulking monolith.

The RIP proposal, as well as city zoning/development regulations generally, need to be amended to consider the following:

*Height of all new construction and remodels on residential streets needs to be similar to or less than other houses on the block. Any exceptions need to involve formal city notice to all nearby neighbors of building plans, giving them rights to submit comments as to negative impact, with greater weight given to neighbors closest in proximity and people who grow food or have already installed solar panels or have other situations which would be negatively affected by the loss of sunlight or other factors. Likewise, the poorest of neighbors, and those who have owned their homes for less time and, therefore, amassed less equity, making it harder for them to "just sell and move," or others with special circumstances I cannot foresee should be given more consideration than wealthier households with more economic flexibility.

*Prevent perfectly fine existing homes from being demolished or drastically remodeled solely to increase their height/square footage/footprint so as to maximize developer profits when there is nothing structurally wrong with the house itself, all while decreasing the supply of more affordable housing (smaller, older houses are cheaper to buy/rent than bigger new/remodeled houses). It will be the smallest, most affordable houses in working-class neighborhoods such as mine that will be demolished (or remodeled so as to be unaffordable) under RIP, not the 3-story, 6000-square-foot mansions in Irvington, Laurelhurst, Alameda, Eastmoreland, or the West Hills. Many of these mansions, ironically, could easily be converted into spacious duplexes, even triplexes, or more, each plex far larger than the square footage of my entire home, with barely a modification to their exteriors. The interior stairwell is often quite near the front door, so add a wall and a door here and there to create a dual entry, add an upstairs kitchen above the downstairs kitchen, add a downstairs shower, if there isn't one already, keep the basement as part of the first floor (or separate it off into its own apartment—this can usually happen quite easily: in older, large homes these basements are often quite livable since they have windows

and full-height ceilings), and keep the attic as part of the second floor. Boom. With a modicum of interior work you've just doubled, possibly tripled, the number of units in some of the most desirable close-in neighborhoods in Portland, without changing much, if any, of the exterior of these houses, and with little impact to neighbors. Sadly, it's unlikely this'll happen anytime soon, if ever, since these are wealthy neighborhoods, and the wealthy always find a way to preserve their specialness. All Americans need to learn to live with less, but no one so much as the wealthy.

*Consider that upzoning has negative effects on existing affordable housing. Rapacious profiteering developers are already buying up housing at alarming rates, demolishing perfectly good homes, or tearing houses down to one wall and then calling what is essentially new construction a remodel to avoid the requirements and fees associated with new construction. This will continue and will, in fact, certainly accelerate under RIP. Address this problem now rather than later. (Related: very extensive remodels, such as what is occurring at 3014 NE 48th, to give just one example, should also trigger the deconstruction ordinance, not just demolitions. This is too big a loophole to allow. The entire 2nd floor and roof was removed, all the siding was removed, all the windows were removed, a major extension was built off the back of the first floor, and all of the interior walls were removed, and that's just what I was able to glean by biking by.) When single-family zoning is banned, new construction tends towards buildings that maximize profit for developers, i.e. duplexes+, which are then put up for sale; the only people who can afford to buy duplexes+ are far wealthier than the people who can buy single-family homes, thus decreasing/eliminating affordable home-ownership opportunities.

*If the city can't outright ban it, figure out how to dis-incentivize homeowners selling to investors/flippers/developers/cash buyers (I don't even know what to call it all anymore) when there is a viable "regular" buyer who is not going to flip the house. The house across the street from me, the house two houses north of that one, the house across the street from that one, etc., all got flipped just since I bought my house 2 years ago. The house next door to me got flipped not long before I bought mine. My house, too, would have been flipped had I not bought it, as I mentioned earlier. This increases prices unnecessarily for a number of reasons, including that flippers often add bedrooms/baths, even when that creates weird, ultra-tiny rooms that aren't natural to the house layout, even when the house is super-small, or an idiotic number of bathrooms for a house that would never need more than one, just to up the sale price. One rarely hears anymore about people like me—the person who could only afford the derelict house and is doing the rehab work themselves. Flippers have prevented that. Many homeowners in Portland who renovated their houses themselves would not even own their homes if what is happening now had been happening 10 or 15 years ago because they didn't have to compete with cash offers: The "fixer-upper" used to be a thing, now it is not. Flipping is also unsustainable practice from a building materials perspective and therefore inconsistent with the city's stated sustainability/climate change goals: Much of what gets installed in a flipped house is unnecessary and also brand new and eventually gets ripped out and likely ends up in a landfill since it is generic garbage to no-one's taste and is likely not being salvaged. House flipping has contributed significantly to the decrease in affordable home-ownership opportunities for low to moderate income-earners in Portland. (Recently, large high-end houses in wealthy neighborhoods like Alameda are also being flipped, but since the wealthy have so many more options, I'll not discuss that more-recent trend here and will let them write their own letter.) The RIP does nothing to address this problem and will *definitely* exacerbate it.

*Consider ecosystem collapse/climate change/other environmental concerns. RIP will contribute to/accelerate loss of green space. Portland has a significant amount of green space and a longstanding history that has continued into the present of urban farms (RF-zoned property is luckily exempt from RIP for some unexplained reason), community and home gardens, including productive food gardens, as well as a supportive network of nonprofits surrounding this, such as the Portland Fruit Tree Project and Growing Gardens, as well as all the school garden projects, the Oregon Food Bank's farm in NE Portland, and the OSU Beginning Urban Farmer Apprenticeship program, which shares farm/garden space in SE Portland with the PSU Sustainability Education Program farm, the OSU Master Gardeners' demonstration gardens, a community garden, garden space reserved for recent immigrants, a large orchard tended by Portland Fruit Tree Project volunteers, and Portland Public Schools. What is the waitlist for the city's community garden plots? Last I checked it was 2 years at some gardens. The RIP is obviously not addressing this demonstrated need. OSU has produced studies determining that home gardens will be increasingly important for community food security, climate moderation, and biodiversity conservation. A surprising amount of food and pollinator habitat can be grown on a regular city lot—especially if the house on that lot is moderately sized—without a lot of space. What is needed? Sun. Max height new construction/remodel can irrevocably change that by blocking it. The economic costs/benefits of home gardening have been studied and the conclusion is that it's economically worth it to grow your own food, to say nothing of all the other proven non-economic benefits.

*Consider how many giant parking lots and garages there are in the city and how this is normalized/considered necessary, to say nothing of street space itself. Transportation and housing issues are interconnected. Coordinate with the transportation department to disincentivize driving everywhere all the time, making underutilized space now prioritized for cars available for housing without demolishing existing homes. There are scads of examples of this around town, but I'll just mention one near me: The US Bank parking lot at 68th and NE Glisan. What a great example of a total waste of space: I've never seen more than 4 vehicles parked in this lot at any one time, there's copious nearby street parking available, yet the lot takes up the entire length of a city block on Glisan, which of course includes the bank building itself, but still. Start regulating/restricting the size of commercial buildings and their parking lots, to say nothing of restricting their construction in the first place. (How many bars, restaurants, and expensive tchotchke shops does one city need anyway?) This is a prime location for a larger residential building on a major thoroughfare near mass transit and established bikeways that wouldn't negatively impact that many homeowners, or likely even necessitate a zoning change. Another example near my house, which I bike by almost every day, is the old corporate headquarters of Banfield Pet Hospital on NE 82nd and Tillamook. It's a giant empty parking lot with an empty building attached. It was a citizen-financed corporate boondoggle, the old story of a corporation dangling the magical stardust of *JOBS!* in front of the city in exchange for the type of egregious tax benefit that could've instead funded affordable housing (or other important things). As quick as could be they quit Portland for VanWA. The building's been empty ever since. How much housing could be there now, in that giant, empty parking lot? (After sitting empty for so long, this building is just now turning into something else, but the parking lot will still be just as grotesquely large, considering how close to bikeways and transit it is. Residential neighborhoods near transit are deemed prime for the most invasive and disruptive upzoning and redevelopment; commercial properties, it seems, are exempt.)

*Consider that building market-rate housing will never deliver the amount of housing people need at prices they can afford. New development will *not* be affordable. The supply-demand market argument has been proven false. Inclusionary zoning laws have fatal loopholes.

*Consider real public housing on the land trust model. Taking housing units permanently off the market is the only long-term solution to the housing crisis. Developers and investors need to be disempowered. All buildings—regardless of number of units—with tenants that are put up for sale need to be offered first to tenants to purchase collectively and turn into co-operative housing. (Related to this, research housing co-operatives in other cities.) It's a tragedy Portland didn't go down this road earlier, when housing was much more affordable. Nationwide, 4 million formerly owner-occupied houses became investor-owned after the 2008 recession. I don't know what the percentage of that number is in Portland, but this is a huge problem. Similarly, there are a lot of Portland renters living in single-family homes (as opposed to plexes or large apartment buildings), some of which have been owned by the same person/people for a very long time, and these houses therefore have very affordable mortgages. What percentage of landlords of these buildings are charging rents that have any correlation whatsoever with their mortgage? Federally, rental income is taxed at a rate about half that of wage income. I see how this can theoretically help to keep rents lower because if the taxes rise on the landlord, the rent is guaranteed to rise on the tenant, since all landlords pass on all costs to their tenant(s). And yet, if a landlord is charging rent that has no correlation whatsoever to their mortgage, as seems likely in Portland since housing costs have risen exponentially in recent years, maybe some sort of fee should be in place? Or they should no longer be eligible for that tax benefit? In any event, *something* needs to be done about this structural problem, and yet I've *never* heard anyone associated with the city mention it.

Below, please consider my line item changes to the RIP: I have reprinted the number and text of the existing proposal, with my proposed changes noted below, following a space.

Housing Options and Scale

2.b. Scale the FAR to increase as the number of units increases on the site.

Amend as to height: limit to surrounding houses.

2.c. Exclude attics and basements from FAR.

Amend to include attics in FAR. In new constructions/remodels attics are rarely the traditional short-as-possible empty spaces we see in older houses, but function instead as additional floors and are being built-out and utilized as such, increasing the sellable/rentable square footage and, thus, the price. FAR as to height should be lowest point on property to roof peak. Keep basement exclusion, which would actually encourage basement construction, which is currently rare, since it's expensive. Most new construction lacks basements so far as I can tell (this is an anecdotal observation that I've noticed biking around town which I'm sure would be proven true if researched) but they're an easy way to add space that doesn't negatively impact neighbors, unlike tall attics.

2.d. Allow a bonus increase in FAR on the site if at least one of the units is affordable (80% median family income).

Delete this. This bizarre definition of “affordable” is, quite frankly, total garbage. Of the 50 largest cities in the U.S., Portland has seen the fastest growth in the share of high-earning households. Thusly, median income here has increased 20% in the past 5 years. As I’m sure you can deduce, this is 100% NOT because working- and lower-middle-class Portlanders who have lived here awhile have seen dramatic wage increases recently; it’s because a bunch of high-income earners have moved here, displacing lower-income earners. In fact, the average American worker, according to many oft-cited studies, has seen stagnant wages for the entire time I’ve been alive (i.e. since the Ford presidency). I myself have not had a wage increase in over 2 1/2 years, meaning I make less now than I did then, on account of general inflation and all manner of cost-of-living expenses that go up at an even more dramatic rate, like property taxes and healthcare costs. I expect these trends to continue. Basing anything related to housing on median family income does NOT translate into affordable. Randomly allowing larger buildings related to a non-existent metric is total garbage, and seems hand-crafted by developers.

2.e. Allow existing houses to add up to 250 sq ft every 5 years, regardless of building size limit.

The phrase “regardless of building size limit” is weird and vague and I’m not sure what this means, and therefore can’t address it, and I doubt I’m the only one. It’s hard to parse. Does this mean I could turn my house into a 30-story building if I built it up by adding 250 sq ft in height every 5 years? Clarify explicitly what is meant, and amend to include a height restriction to similar to/less than surrounding houses.

Building Design

8. Revise how height is measured (all zones).

8.a. Measure height from the lowest point near the house, not the highest point.

Yes, but in addition clarify what “near” means, and have a procedure in place to prevent developers from figuring out the loophole(s) to this vague wording, as they surely will.

8.c. Continue to allow 2 1/2 story houses (30 feet high) on standard lots.

Delete. Replace with, “All houses/plexes will now be “similar to, or lower in, height to existing houses on block.”

Thank you for considering my—and everyone else’s—testimony. Some people are quite cynical about our chances of having any effect whatsoever on city policy through the public comment process, believing that city planners are beholden to developers but pretend to care what citizens think, a situation about which geographer Samuel Stein writes, “Planners must proceed with enough openness and transparency to maintain public legitimacy, while ensuring that capital retains ultimate control over the processes’ parameters.” I would so love to believe this isn’t true here. It has been obvious to me since I was a teenager that massive, progressive structural economic change is needed throughout American society, and while I don’t expect Portland to solve the nationwide housing availability/affordability crisis with one set of

guidelines, let's at least try to not continue to exacerbate the problems we already have or make them demonstrably worse.

190093



Emily Meier

#83020 | January 15, 2020

Testimony to **Portland City Council** on the **Residential Infill Project, Recommended Draft**

There are immense problems facing Portland, to say nothing of Oregon as a whole, related to housing and land use. As I'm sure you know, this past year saw a 10% increase in our state's homeless population. People are leaving the city, not because they want to, but because they can no longer afford to live here. I will say at the outset that I am not inherently opposed to duplexes, triplexes, and fourplexes in Portland on what were formally lots zoned single-family home. I would also like to note that it is not my neighborhood's "character," when that term is understood as a racialized code word, that I am concerned with protecting. My neighborhood is a multiracial working-class neighborhood and I would like it to stay that way. And I'm overjoyed that the city is finally doing something to mitigate the construction of monstrous maximum height, maximum square footage, maximum footprint, minimum setback luxury homes that sell for over a million dollars and are completely out-of-scale/out-of-price with nearby existing homes and are just plopped down amidst blocks of modest single-story houses in working- or middle-class neighborhoods (see, for one example among so very many, 1415 NE Going St, a particularly egregious instance of this that makes me physically ill every time I bike by it). This went on for way too long and I'm so glad it's potentially coming to an end. But I have some other concerns. There's a new construction single-family house going up one house down from mine, not right next door, but next to that one. This property used to be on one lot shared with the house that is next door to me and was split off when the house next to me was sold/flipped. The new construction going in is 4 bedrooms, 4 bathrooms, 2 1/2 stories, no basement, and extends in all directions as close to the property line as legally allowed, so, almost right up to neighboring fences. Some of these details not observable from the exterior, such as number of beds and baths, are gleaned from another neighbor, who saw the plans randomly one day while he was out walking his dogs and the developer happened to be there with the blueprints, otherwise I'd never know this information, since there is no requirement to inform neighbors. Why anyone needs four bathrooms in a single-family home I'll never know, to say nothing of four bedrooms, in this era of decreasing family size. I've shared a single-family home with as many as 9 other adults, and never had more than 1 1/2 baths. Every other house on this entire block, regardless of number of bedrooms, is single-story, modest footprint, modest square-footage. In fact, neighborhood-wide, there are few houses as large as this one, and likely none as tall. This design should never have been approved by the city. I never saw any plans for this new construction myself, was never informed about any of it, though it affects me. Why is that? If this were a duplex, triplex or fourplex I would not be opposed to the fact of it being a duplex+, but

rather to, primarily, the total height and, secondarily, the footprint and square footage. Whoever buys this house will surely be far wealthier than anyone else around, and will not be bothered by that fact, nor by how their home looms over all of their new neighbors. How that will affect neighborhood dynamics and interpersonal interactions I can't say, but I'm not hopeful. I have also noticed that when this type of development goes in, it seems to encourage more of the same on the block/in the neighborhood, based on my anecdotal survey of demolitions and new construction, which I see a fair amount of up close since I bike for most of my transit and used to live in Boise-Eliot, a neighborhood that has been overrun with new construction. On the aforementioned block of NE Going between 14th and 15th, a corner house was recently for sale. It sold immediately and was then demolished very quickly, possibly to avoid the 1/20/2020 shift to a 1940-or-earlier construction date requiring deconstruction rather than demolition. Guess what's going up in its place? You think it'll be affordable? You know the answer to these questions. I have lived in Portland since 2001, mostly in different North Portland neighborhoods, and have spent almost all of that time in group rental housing, which is—or was—quite common here: Multiple unrelated adults living in one rented single-family house. In mid-2017 I was no-cause evicted from my rental house of 8 years, where the landlord had promised me housing security for the rest of my life. I made life-altering decisions based on this promise, as one does, leaving one job for another, providing the landlord with countless hours of free labor maintaining the house and property, etc. I helped to create and maintain a large, productive vegetable/fruit garden, shared with many, to which I devoted more time and emotional energy than I could possibly tally and which I was forced to abruptly abandon. Most impactful, though, I didn't buy a house years earlier, though I had the means to do so financially, because I was promised housing security: I saw no reason to buy, when most of the benefits of owning a house, as I saw it, I already had. No-cause evictions still being legal at the time, I had 90 days to find another living situation—this after 2 years of 10% growth each year in the price of homes—and managed to find exactly one house I could (barely) afford to buy: East of 82nd, 1 bedroom, 680 square feet, ripped down to the studs inside by the previous owner. The only way I could buy it was with a FHA 203k Rehab Loan (research what that entails if you're curious about logistical/bureaucratic nightmares), and with the seller wanting to sell to a real person who actually wanted to remodel/live in the house longterm rather than any one of the four house flippers offering cash who would never live in the house, and just sell it at a profit. There was no city/state ordinance prohibiting or even dis-incentivizing selling to flippers at the time nor is there now; I just got lucky to find a seller willing to sell to a real person despite how tricky and time-consuming such a sale would be. I have no doubt that if the Residential Infill Project (RIP) guidelines had been implemented by then the house I now live in would have been demolished and a massive building put in its place. I've talked to other potential and actual homebuyers, on my economic level and above, and the competing-with-cash-offers thing is a BIG DEAL in Portland preventing folks from buying homes. RIP will exacerbate this widespread problem. Over two years later I'm still working on the house. In fact, it's quite taken over my life and I've had to stop doing many of the things that made up my life before. I'm doing as much of the work as possible myself since I have no disposable income (I don't even come close to making double my mortgage, thus squarely situating

me within that cost-burdened camp of 1/3 of Americans who spend more than 1/3 of their income on housing) and also work full-time. The quality of the work I'm doing on the house has nothing to do with maximizing profit while minimizing investment, which is, sadly, what house flippers do. On the contrary, I bought the house to have what had just been taken from me in the no-cause eviction—security, autonomy, space to grow food—not to turn a quick profit. The level of the work I'm doing, the quality, it just has nothing to do with contemporary, throw-away construction. The house was built in 1912 and I'm trying to keep the work to the quality of that era: long-lasting, sustainable, quality craftsmanship: stain-grade fir trim around windows and doors, solid wood custom cabinetry which I will build myself, using reclaimed materials when possible, etc. Outdoors I've ripped out useless, non-native shrubs, an unreal quantity of grass, and tilled soil by hand to put in a large, productive vegetable garden (fruit coming this spring), which supplies me with much of my produce year-round. Given all that, what would happen if that 2 1/2 story maximum height, maximum footprint suburban-style 4-BR house got built just to the south or west of me instead of one house down? What would happen if that 30' tall house was a duplex or a triplex or a fourplex? Regardless of the number of units, I'd lose most—if not all—of my sun, and therefore could not grow food, making my house worth nothing to me. But could I recoup my expenses in materials, labor, and emotional investment if I sold it? Nope. Not even close. And what could I do about that? Exactly nothing. I would not ever be compensated for that loss. Not now and not under the new RIP guidelines. And that's a huge problem, not only with RIP, but also with existing zoning regulations. There would be no notification to me or any other nearby homeowner of the proposed development. No review process. No assessment of whether Portland (or the world) needs more maximum height, maximum square-footage, maximum footprint, minimal setback, 4-bed, 4-bath houses. No process by which such a house would be critiqued vis-a-vis the city's own stated sustainability/climate change goals. No consideration of the decreased emotional/psychological value of my home to me, (to say nothing of the loss of economic value), a home that is inarguably actually consistent with sustainability/climate change goals due to its small size and productive year-round food garden. No consideration of what it feels like to have a house loom over all its neighbors like a cruise ship docked amidst rowboats. It would hardly matter if this new construction was a single-family home or a duplex or triplex: I could care less about the number of units. Its negative impact would be the same. How do you talk to somebody who's looking down on you? I'd rather see two, three, or four tiny houses on that lot than that hulking monolith. The RIP proposal, as well as city zoning/development regulations generally, need to be amended to consider the following: *Height of all new construction and remodels on residential streets needs to be similar to or less than other houses on the block. Any exceptions need to involve formal city notice to all nearby neighbors of building plans, giving them rights to submit comments as to negative impact, with greater weight given to neighbors closest in proximity and people who grow food or have already installed solar panels or have other situations which would be negatively affected by the loss of sunlight or other factors. Likewise, the poorest of neighbors, and those who have owned their homes for less time and, therefore, amassed less equity, making it harder for them to "just sell and move," or others with special circumstances I cannot foresee should be given more consideration than wealthier

households with more economic flexibility. *Prevent perfectly fine existing homes from being demolished or drastically remodeled solely to increase their height/square footage/footprint so as to maximize developer profits when there is nothing structurally wrong with the house itself, all while decreasing the supply of more affordable housing (smaller, older houses are cheaper to buy/rent than bigger new/remodeled houses). It will be the smallest, most affordable houses in working-class neighborhoods such as mine that will be demolished (or remodeled so as to be unaffordable) under RIP, not the 3-story, 6000-square-foot mansions in Irvington, Laurelhurst, Alameda, Eastmoreland, or the West Hills. Many of these mansions, ironically, could easily be converted into spacious duplexes, even triplexes, or more, each plex far larger than the square footage of my entire home, with barely a modification to their exteriors. The interior stairwell is often quite near the front door, so add a wall and a door here and there to create a dual entry, add an upstairs kitchen above the downstairs kitchen, add a downstairs shower, if there isn't one already, keep the basement as part of the first floor (or separate it off into its own apartment—this can usually happen quite easily: in older, large homes these basements are often quite livable since they have windows and full-height ceilings), and keep the attic as part of the second floor. Boom. With a modicum of interior work you've just doubled, possibly tripled, the number of units in some of the most desirable close-in neighborhoods in Portland, without changing much, if any, of the exterior of these houses, and with little impact to neighbors. Sadly, it's unlikely this'll happen anytime soon, if ever, since these are wealthy neighborhoods, and the wealthy always find a way to preserve their specialness. All Americans need to learn to live with less, but no one so much as the wealthy. *Consider that upzoning has negative effects on existing affordable housing. Rapacious profiteering developers are already buying up housing at alarming rates, demolishing perfectly good homes, or tearing houses down to one wall and then calling what is essentially new construction a remodel to avoid the requirements and fees associated with new construction. This will continue and will, in fact, certainly accelerate under RIP. Address this problem now rather than later. (Related: very extensive remodels, such as what is occurring at 3014 NE 48th, to give just one example, should also trigger the deconstruction ordinance, not just demolitions. This is too big a loophole to allow. The entire 2nd floor and roof was removed, all the siding was removed, all the windows were removed, a major extension was built off the back of the first floor, and all of the interior walls were removed, and that's just what I was able to glean by biking by.) When single-family zoning is banned, new construction tends towards buildings that maximize profit for developers, i.e. duplexes+, which are then put up for sale; the only people who can afford to buy duplexes+ are far wealthier than the people who can buy single-family homes, thus decreasing/eliminating affordable home-ownership opportunities. *If the city can't outright ban it, figure out how to dis-incentivize homeowners selling to investors/flippers/developers/cash buyers (I don't even know what to call it all anymore) when there is a viable "regular" buyer who is not going to flip the house. The house across the street from me, the house two houses north of that one, the house across the street from that one, etc., all got flipped just since I bought my house 2 years ago. The house next door to me got flipped not long before I bought mine. My house, too, would have been flipped had I not bought it, as I mentioned earlier. This increases prices unnecessarily for a number of reasons, including that flippers often add

bedrooms/baths, even when that creates weird, ultra-tiny rooms that aren't natural to the house layout, even when the house is super-small, or an idiotic number of bathrooms for a house that would never need more than one, just to up the sale price. One rarely hears anymore about people like me—the person who could only afford the derelict house and is doing the rehab work themselves. Flippers have prevented that. Many homeowners in Portland who renovated their houses themselves would not even own their homes if what is happening now had been happening 10 or 15 years ago because they didn't have to compete with cash offers: The “fixer-upper” used to be a thing, now it is not. Flipping is also unsustainable practice from a building materials perspective and therefore inconsistent with the city's stated sustainability/climate change goals: Much of what gets installed in a flipped house is unnecessary and also brand new and eventually gets ripped out and likely ends up in a landfill since it is generic garbage to no-one's taste and is likely not being salvaged. House flipping has contributed significantly to the decrease in affordable home-ownership opportunities for low to moderate income-earners in Portland. (Recently, large high-end houses in wealthy neighborhoods like Alameda are also being flipped, but since the wealthy have so many more options, I'll not discuss that more-recent trend here and will let them write their own letter.)

The RIP does nothing to address this problem and will definitely exacerbate it. *Consider ecosystem collapse/climate change/other environmental concerns. RIP will contribute to/accelerate loss of green space. Portland has a significant amount of green space and a longstanding history that has continued into the present of urban farms (RF-zoned property is luckily exempt from RIP for some unexplained reason), community and home gardens, including productive food gardens, as well as a supportive network of nonprofits surrounding this, such as the Portland Fruit Tree Project and Growing Gardens, as well as all the school garden projects, the Oregon Food Bank's farm in NE Portland, and the OSU Beginning Urban Farmer Apprenticeship program, which shares farm/garden space in SE Portland with the PSU Sustainability Education Program farm, the OSU Master Gardeners' demonstration gardens, a community garden, garden space reserved for recent immigrants, a large orchard tended by Portland Fruit Tree Project volunteers, and Portland Public Schools. What is the waitlist for the city's community garden plots? Last I checked it was 2 years at some gardens. The RIP is obviously not addressing this demonstrated need. OSU has produced studies determining that home gardens will be increasingly important for community food security, climate moderation, and biodiversity conservation. A surprising amount of food and pollinator habitat can be grown on a regular city lot—especially if the house on that lot is moderately sized—without a lot of space. What is needed? Sun. Max height new construction/remodel can irrevocably change that by blocking it. The economic costs/benefits of home gardening have been studied and the conclusion is that it's economically worth it to grow your own food, to say nothing of all the other proven non-economic benefits. *Consider how many giant parking lots and garages there are in the city and how this is normalized/considered necessary, to say nothing of street space itself. Transportation and housing issues are interconnected. Coordinate with the transportation department to dis-incentivize driving everywhere all the time, making underutilized space now prioritized for cars available for housing without demolishing existing homes. There are scads of examples of this around town, but I'll just mention one near me: The US Bank parking lot at 68th

and NE Glisan. What a great example of a total waste of space: I've never seen more than 4 vehicles parked in this lot at any one time, there's copious nearby street parking available, yet the lot takes up the entire length of a city block on Glisan, which of course includes the bank building itself, but still. Start regulating/restricting the size of commercial buildings and their parking lots, to say nothing of restricting their construction in the first place. (How many bars, restaurants, and expensive tchotchke shops does one city need anyway?) This is a prime location for a larger residential building on a major thoroughfare near mass transit and established bikeways that wouldn't negatively impact that many homeowners, or likely even necessitate a zoning change. Another example near my house, which I bike by almost every day, is the old corporate headquarters of Banfield Pet Hospital on NE 82nd and Tillamook. It's a giant empty parking lot with an empty building attached. It was a citizen-financed corporate boondoggle, the old story of a corporation dangling the magical stardust of **JOBS!* in front of the city in exchange for the type of egregious tax benefit that could've instead funded affordable housing (or other important things). As quick as could be they quit Portland for VanWA. The building's been empty ever since. How much housing could be there now, in that giant, empty parking lot? (After sitting empty for so long, this building is just now turning into something else, but the parking lot will still be just as grotesquely large, considering how close to bikeways and transit it is. Residential neighborhoods near transit are deemed prime for the most invasive and disruptive upzoning and redevelopment; commercial properties, it seems, are exempt.)

**Consider that building market-rate housing will never deliver the amount of housing people need at prices they can afford. New development will not be affordable. The supply-demand market argument has been proven false. Inclusionary zoning laws have fatal loopholes. *Consider real public housing on the land trust model. Taking housing units permanently off the market is the only long-term solution to the housing crisis. Developers and investors need to be disempowered. All buildings—regardless of number of units—with tenants that are put up for sale need to be offered first to tenants to purchase collectively and turn into co-operative housing. (Related to this, research housing co-operatives in other cities.) It's a tragedy Portland didn't go down this road earlier, when housing was much more affordable. Nationwide, 4 million formerly owner-occupied houses became investor-owned after the 2008 recession. I don't know what the percentage of that number is in Portland, but this is a huge problem. Similarly, there are a lot of Portland renters living in single-family homes (as opposed to plexes or large apartment buildings), some of which have been owned by the same person/people for a very long time, and these houses therefore have very affordable mortgages. What percentage of landlords of these buildings are charging rents that have any correlation whatsoever with their mortgage? Federally, rental income is taxed at a rate about half that of wage income. I see how this can theoretically help to keep rents lower because if the taxes rise on the landlord, the rent is guaranteed to rise on the tenant, since all landlords pass on all costs to their tenant(s). And yet, if a landlord is charging rent that has no correlation whatsoever to their mortgage, as seems likely in Portland since housing costs have risen exponentially in recent years, maybe some sort of fee should be in place? Or they should no longer be eligible for that tax benefit? In any event, something needs to be done about this structural problem, and yet I've never heard anyone associated with the city mention it. Below, please consider my line item changes to the*

RIP: I have reprinted the number and text of the existing proposal, with my proposed changes noted below, following a space. Housing Options and Scale 2.b. Scale the FAR to increase as the number of units increases on the site. Amend as to height: limit to surrounding houses. 2.c. Exclude attics and basements from FAR. Amend to include attics in FAR. In new constructions/remodels attics are rarely the traditional short-as-possible empty spaces we see in older houses, but function instead as additional floors and are being built-out and utilized as such, increasing the sellable/rentable square footage and, thus, the price. FAR as to height should be lowest point on property to roof peak. Keep basement exclusion, which would actually encourage basement construction, which is currently rare, since it's expensive. Most new construction lacks basements so far as I can tell (this is an anecdotal observation that I've noticed biking around town which I'm sure would be proven true if researched) but they're an easy way to add space that doesn't negatively impact neighbors, unlike tall attics. 2.d. Allow a bonus increase in FAR on the site if at least one of the units is affordable (80% median family income). Delete this. This bizarre definition of "affordable" is, quite frankly, total garbage. Of the 50 largest cities in the U.S., Portland has seen the fastest growth in the share of high-earning households. Thusly, median income here has increased 20% in the past 5 years. As I'm sure you can deduce, this is 100% NOT because working- and lower-middle-class Portlanders who have lived here awhile have seen dramatic wage increases recently; it's because a bunch of high-income earners have moved here, displacing lower-income earners. In fact, the average American worker, according to many oft-cited studies, has seen stagnant wages for the entire time I've been alive (i.e. since the Ford presidency). I myself have not had a wage increase in over 2 1/2 years, meaning I make less now than I did then, on account of general inflation and all manner of cost-of-living expenses that go up at an even more dramatic rate, like property taxes and healthcare costs. I expect these trends to continue. Basing anything related to housing on median family income does NOT translate into affordable. Randomly allowing larger buildings related to a non-existent metric is total garbage, and seems hand-crafted by developers. 2.e. Allow existing houses to add up to 250 sq ft every 5 years, regardless of building size limit. The phrase "regardless of building size limit" is weird and vague and I'm not sure what this means, and therefore can't address it, and I doubt I'm the only one. It's hard to parse. Does this mean I could turn my house into a 30-story building if I built it up by adding 250 sq ft in height every 5 years? Clarify explicitly what is meant, and amend to include a height restriction to similar to/less than surrounding houses. Building Design 8. Revise how height is measured (all zones). 8.a. Measure height from the lowest point near the house, not the highest point. Yes, but in addition clarify what "near" means, and have a procedure in place to prevent developers from figuring out the loophole(s) to this vague wording, as they surely will. 8.c. Continue to allow 2 1/2 story houses (30 feet high) on standard lots. Delete. Replace with, "All houses/plexes will now be "similar to, or lower in, height to existing houses on block." Thank you for considering my—and everyone else's—testimony. Some people are quite cynical about our chances of having any effect whatsoever on city policy through the public comment process, believing that city planners are beholden to developers but pretend to care what citizens think, a situation about which geographer Samuel Stein writes, "Planners must proceed with enough openness and transparency to maintain public legitimacy, while ensuring that capital retains ultimate

control over the processes' parameters." I would so love to believe this isn't true here. It has been obvious to me since I was a teenager that massive, progressive structural economic change is needed throughout American society, and while I don't expect Portland to solve the nationwide housing availability/affordability crisis with one set of guidelines, let's at least try to not continue to exacerbate the problems we already have or make them demonstrably worse. There are immense problems facing Portland, to say nothing of Oregon as a whole, related to housing and land use. As I'm sure you know, this past year saw a 10% increase in our state's homeless population. People are leaving the city, not because they want to, but because they can no longer afford to live here. I will say at the outset that I am not inherently opposed to duplexes, triplexes, and fourplexes in Portland on what were formally lots zoned single-family home. I would also like to note that it is not my neighborhood's "character," when that term is understood as a racialized code word, that I am concerned with protecting. My neighborhood is a multiracial working-class neighborhood and I would like it to stay that way. And I'm overjoyed that the city is finally doing something to mitigate the construction of monstrous maximum height, maximum square footage, maximum footprint, minimum setback luxury homes that sell for over a million dollars and are completely out-of-scale/out-of-price with nearby existing homes and are just plopped down amidst blocks of modest single-story houses in working- or middle-class neighborhoods (see, for one example among so very many, 1415 NE Going St, a particularly egregious instance of this that makes me physically ill every time I bike by it). This went on for way too long and I'm so glad it's potentially coming to an end. But I have some other concerns. There's a new construction single-family house going up one house down from mine, not right next door, but next to that one. This property used to be on one lot shared with the house that is next door to me and was split off when the house next to me was sold/flipped. The new construction going in is 4 bedrooms, 4 bathrooms, 2 1/2 stories, no basement, and extends in all directions as close to the property line as legally allowed, so, almost right up to neighboring fences. Some of these details not observable from the exterior, such as number of beds and baths, are gleaned from another neighbor, who saw the plans randomly one day while he was out walking his dogs and the developer happened to be there with the blueprints, otherwise I'd never know this information, since there is no requirement to inform neighbors. Why anyone needs four bathrooms in a single-family home I'll never know, to say nothing of four bedrooms, in this era of decreasing family size. I've shared a single-family home with as many as 9 other adults, and never had more than 1 1/2 baths. Every other house on this entire block, regardless of number of bedrooms, is single-story, modest footprint, modest square-footage. In fact, neighborhood-wide, there are few houses as large as this one, and likely none as tall. This design should never have been approved by the city. I never saw any plans for this new construction myself, was never informed about any of it, though it affects me. Why is that? If this were a duplex, triplex or fourplex I would not be opposed to the fact of it being a duplex+, but rather to, primarily, the total height and, secondarily, the footprint and square footage. Whoever buys this house will surely be far wealthier than anyone else around, and will not be bothered by that fact, nor by how their home looms over all of their new neighbors. How that will affect neighborhood dynamics and interpersonal interactions I can't say, but I'm not hopeful. I have also noticed that when this type of development goes in, it

seems to encourage more of the same on the block/in the neighborhood, based on my anecdotal survey of demolitions and new construction, which I see a fair amount of up close since I bike for most of my transit and used to live in Boise-Eliot, a neighborhood that has been overrun with new construction. On the aforementioned block of NE Going between 14th and 15th, a corner house was recently for sale. It sold immediately and was then demolished very quickly, possibly to avoid the 1/20/2020 shift to a 1940-or-earlier construction date requiring deconstruction rather than demolition. Guess what's going up in its place? You think it'll be affordable? You know the answer to these questions. I have lived in Portland since 2001, mostly in different North Portland neighborhoods, and have spent almost all of that time in group rental housing, which is—or was—quite common here: Multiple unrelated adults living in one rented single-family house. In mid-2017 I was no-cause evicted from my rental house of 8 years, where the landlord had promised me housing security for the rest of my life. I made life-altering decisions based on this promise, as one does, leaving one job for another, providing the landlord with countless hours of free labor maintaining the house and property, etc. I helped to create and maintain a large, productive vegetable/fruit garden, shared with many, to which I devoted more time and emotional energy than I could possibly tally and which I was forced to abruptly abandon. Most impactful, though, I didn't buy a house years earlier, though I had the means to do so financially, because I was promised housing security: I saw no reason to buy, when most of the benefits of owning a house, as I saw it, I already had. No-cause evictions still being legal at the time, I had 90 days to find another living situation—this after 2 years of 10% growth each year in the price of homes—and managed to find exactly one house I could (barely) afford to buy: East of 82nd, 1 bedroom, 680 square feet, ripped down to the studs inside by the previous owner. The only way I could buy it was with a FHA 203k Rehab Loan (research what that entails if you're curious about logistical/bureaucratic nightmares), and with the seller wanting to sell to a real person who actually wanted to remodel/live in the house longterm rather than any one of the four house flippers offering cash who would never live in the house, and just sell it at a profit. There was no city/state ordinance prohibiting or even dis-incentivizing selling to flippers at the time nor is there now; I just got lucky to find a seller willing to sell to a real person despite how tricky and time-consuming such a sale would be. I have no doubt that if the Residential Infill Project (RIP) guidelines had been implemented by then the house I now live in would have been demolished and a massive building put in its place. I've talked to other potential and actual homebuyers, on my economic level and above, and the competing-with-cash-offers thing is a BIG DEAL in Portland preventing folks from buying homes. RIP will exacerbate this widespread problem. Over two years later I'm still working on the house. In fact, it's quite taken over my life and I've had to stop doing many of the things that made up my life before. I'm doing as much of the work as possible myself since I have no disposable income (I don't even come close to making double my mortgage, thus squarely situating me within that cost-burdened camp of 1/3 of Americans who spend more than 1/3 of their income on housing) and also work full-time. The quality of the work I'm doing on the house has nothing to do with maximizing profit while minimizing investment, which is, sadly, what house flippers do. On the contrary, I bought the house to have what had just been taken from me in the no-cause

eviction—security, autonomy, space to grow food—not to turn a quick profit. The level of the work I’m doing, the quality, it just has nothing to do with contemporary, throw-away construction. The house was built in 1912 and I’m trying to keep the work to the quality of that era: long-lasting, sustainable, quality craftsmanship: stain-grade fir trim around windows and doors, solid wood custom cabinetry which I will build myself, using reclaimed materials when possible, etc. Outdoors I’ve ripped out useless, non-native shrubs, an unreal quantity of grass, and tilled soil by hand to put in a large, productive vegetable garden (fruit coming this spring), which supplies me with much of my produce year-round. Given all that, what would happen if that 2 1/2 story maximum height, maximum footprint suburban-style 4-BR house got built just to the south or west of me instead of one house down? What would happen if that 30’ tall house was a duplex or a triplex or a fourplex? Regardless of the number of units, I’d lose most—if not all—of my sun, and therefore could not grow food, making my house worth nothing to me. But could I recoup my expenses in materials, labor, and emotional investment if I sold it? Nope. Not even close. And what could I do about that? Exactly nothing. I would not ever be compensated for that loss. Not now and not under the new RIP guidelines. And that’s a huge problem, not only with RIP, but also with existing zoning regulations. There would be no notification to me or any other nearby homeowner of the proposed development. No review process. No assessment of whether Portland (or the world) needs more maximum height, maximum square-footage, maximum footprint, minimal setback, 4-bed, 4-bath houses. No process by which such a house would be critiqued vis-a-vis the city’s own stated sustainability/climate change goals. No consideration of the decreased emotional/psychological value of my home to me, (to say nothing of the loss of economic value), a home that is inarguably actually consistent with sustainability/climate change goals due to its small size and productive year-round food garden. No consideration of what it feels like to have a house loom over all its neighbors like a cruise ship docked amidst rowboats. It would hardly matter if this new construction was a single-family home or a duplex or triplex: I could care less about the number of units. Its negative impact would be the same. How do you talk to somebody who’s looking down on you? I’d rather see two, three, or four tiny houses on that lot than that hulking monolith. The RIP proposal, as well as city zoning/development regulations generally, need to be amended to consider the following: *Height of all new construction and remodels on residential streets needs to be similar to or less than other houses on the block. Any exceptions need to involve formal city notice to all nearby neighbors of building plans, giving them rights to submit comments as to negative impact, with greater weight given to neighbors closest in proximity and people who grow food or have already installed solar panels or have other situations which would be negatively affected by the loss of sunlight or other factors. Likewise, the poorest of neighbors, and those who have owned their homes for less time and, therefore, amassed less equity, making it harder for them to “just sell and move,” or others with special circumstances I cannot foresee should be given more consideration than wealthier households with more economic flexibility. *Prevent perfectly fine existing homes from being demolished or drastically remodeled solely to increase their height/square footage/footprint so as to maximize developer profits when there is nothing structurally wrong with the house itself, all while decreasing the supply of more affordable housing (smaller, older houses are cheaper to buy/rent than

bigger new/remodeled houses). It will be the smallest, most affordable houses in working-class neighborhoods such as mine that will be demolished (or remodeled so as to be unaffordable) under RIP, not the 3-story, 6000-square-foot mansions in Irvington, Laurelhurst, Alameda, Eastmoreland, or the West Hills. Many of these mansions, ironically, could easily be converted into spacious duplexes, even triplexes, or more, each plex far larger than the square footage of my entire home, with barely a modification to their exteriors. The interior stairwell is often quite near the front door, so add a wall and a door here and there to create a dual entry, add an upstairs kitchen above the downstairs kitchen, add a downstairs shower, if there isn't one already, keep the basement as part of the first floor (or separate it off into its own apartment—this can usually happen quite easily: in older, large homes these basements are often quite livable since they have windows and full-height ceilings), and keep the attic as part of the second floor. Boom. With a modicum of interior work you've just doubled, possibly tripled, the number of units in some of the most desirable close-in neighborhoods in Portland, without changing much, if any, of the exterior of these houses, and with little impact to neighbors. Sadly, it's unlikely this'll happen anytime soon, if ever, since these are wealthy neighborhoods, and the wealthy always find a way to preserve their specialness. All Americans need to learn to live with less, but no one so much as the wealthy. *Consider that upzoning has negative effects on existing affordable housing. Rapacious profiteering developers are already buying up housing at alarming rates, demolishing perfectly good homes, or tearing houses down to one wall and then calling what is essentially new construction a remodel to avoid the requirements and fees associated with new construction. This will continue and will, in fact, certainly accelerate under RIP. Address this problem now rather than later. (Related: very extensive remodels, such as what is occurring at 3014 NE 48th, to give just one example, should also trigger the deconstruction ordinance, not just demolitions. This is too big a loophole to allow. The entire 2nd floor and roof was removed, all the siding was removed, all the windows were removed, a major extension was built off the back of the first floor, and all of the interior walls were removed, and that's just what I was able to glean by biking by.) When single-family zoning is banned, new construction tends towards buildings that maximize profit for developers, i.e. duplexes+, which are then put up for sale; the only people who can afford to buy duplexes+ are far wealthier than the people who can buy single-family homes, thus decreasing/eliminating affordable home-ownership opportunities. *If the city can't outright ban it, figure out how to dis-incentivize homeowners selling to investors/flippers/developers/cash buyers (I don't even know what to call it all anymore) when there is a viable "regular" buyer who is not going to flip the house. The house across the street from me, the house two houses north of that one, the house across the street from that one, etc., all got flipped just since I bought my house 2 years ago. The house next door to me got flipped not long before I bought mine. My house, too, would have been flipped had I not bought it, as I mentioned earlier. This increases prices unnecessarily for a number of reasons, including that flippers often add bedrooms/baths, even when that creates weird, ultra-tiny rooms that aren't natural to the house layout, even when the house is super-small, or an idiotic number of bathrooms for a house that would never need more than one, just to up the sale price. One rarely hears anymore about people like me—the person who could only afford the derelict house and is doing the rehab work

themselves. Flippers have prevented that. Many homeowners in Portland who renovated their houses themselves would not even own their homes if what is happening now had been happening 10 or 15 years ago because they didn't have to compete with cash offers: The "fixer-upper" used to be a thing, now it is not. Flipping is also unsustainable practice from a building materials perspective and therefore inconsistent with the city's stated sustainability/climate change goals: Much of what gets installed in a flipped house is unnecessary and also brand new and eventually gets ripped out and likely ends up in a landfill since it is generic garbage to no-one's taste and is likely not being salvaged. House flipping has contributed significantly to the decrease in affordable home-ownership opportunities for low to moderate income-earners in Portland. (Recently, large high-end houses in wealthy neighborhoods like Alameda are also being flipped, but since the wealthy have so many more options, I'll not discuss that more-recent trend here and will let them write their own letter.) The RIP does nothing to address this problem and will definitely exacerbate it. *Consider ecosystem collapse/climate change/other environmental concerns. RIP will contribute to/accelerate loss of green space. Portland has a significant amount of green space and a longstanding history that has continued into the present of urban farms (RF-zoned property is luckily exempt from RIP for some unexplained reason), community and home gardens, including productive food gardens, as well as a supportive network of nonprofits surrounding this, such as the Portland Fruit Tree Project and Growing Gardens, as well as all the school garden projects, the Oregon Food Bank's farm in NE Portland, and the OSU Beginning Urban Farmer Apprenticeship program, which shares farm/garden space in SE Portland with the PSU Sustainability Education Program farm, the OSU Master Gardeners' demonstration gardens, a community garden, garden space reserved for recent immigrants, a large orchard tended by Portland Fruit Tree Project volunteers, and Portland Public Schools. What is the waitlist for the city's community garden plots? Last I checked it was 2 years at some gardens. The RIP is obviously not addressing this demonstrated need. OSU has produced studies determining that home gardens will be increasingly important for community food security, climate moderation, and biodiversity conservation. A surprising amount of food and pollinator habitat can be grown on a regular city lot—especially if the house on that lot is moderately sized—without a lot of space. What is needed? Sun. Max height new construction/remodel can irrevocably change that by blocking it. The economic costs/benefits of home gardening have been studied and the conclusion is that it's economically worth it to grow your own food, to say nothing of all the other proven non-economic benefits. *Consider how many giant parking lots and garages there are in the city and how this is normalized/considered necessary, to say nothing of street space itself. Transportation and housing issues are interconnected. Coordinate with the transportation department to dis-incentivize driving everywhere all the time, making underutilized space now prioritized for cars available for housing without demolishing existing homes. There are scads of examples of this around town, but I'll just mention one near me: The US Bank parking lot at 68th and NE Glisan. What a great example of a total waste of space: I've never seen more than 4 vehicles parked in this lot at any one time, there's copious nearby street parking available, yet the lot takes up the entire length of a city block on Glisan, which of course includes the bank building itself, but still. Start regulating/restricting the size of commercial buildings and their parking lots, to say nothing of

restricting their construction in the first place. (How many bars, restaurants, and expensive tchotchke shops does one city need anyway?) This is a prime location for a larger residential building on a major thoroughfare near mass transit and established bikeways that wouldn't negatively impact that many homeowners, or likely even necessitate a zoning change. Another example near my house, which I bike by almost every day, is the old corporate headquarters of Banfield Pet Hospital on NE 82nd and Tillamook. It's a giant empty parking lot with an empty building attached. It was a citizen-financed corporate boondoggle, the old story of a corporation dangling the magical stardust of **JOBS!* in front of the city in exchange for the type of egregious tax benefit that could've instead funded affordable housing (or other important things). As quick as could be they quit Portland for VanWA. The building's been empty ever since. How much housing could be there now, in that giant, empty parking lot? (After sitting empty for so long, this building is just now turning into something else, but the parking lot will still be just as grotesquely large, considering how close to bikeways and transit it is. Residential neighborhoods near transit are deemed prime for the most invasive and disruptive upzoning and redevelopment; commercial properties, it seems, are exempt.)

**Consider that building market-rate housing will never deliver the amount of housing people need at prices they can afford. New development will not be affordable. The supply-demand market argument has been proven false. Inclusionary zoning laws have fatal loopholes. *Consider real public housing on the land trust model. Taking housing units permanently off the market is the only long-term solution to the housing crisis. Developers and investors need to be disempowered. All buildings—regardless of number of units—with tenants that are put up for sale need to be offered first to tenants to purchase collectively and turn into co-operative housing. (Related to this, research housing co-operatives in other cities.) It's a tragedy Portland didn't go down this road earlier, when housing was much more affordable. Nationwide, 4 million formerly owner-occupied houses became investor-owned after the 2008 recession. I don't know what the percentage of that number is in Portland, but this is a huge problem. Similarly, there are a lot of Portland renters living in single-family homes (as opposed to plexes or large apartment buildings), some of which have been owned by the same person/people for a very long time, and these houses therefore have very affordable mortgages. What percentage of landlords of these buildings are charging rents that have any correlation whatsoever with their mortgage? Federally, rental income is taxed at a rate about half that of wage income. I see how this can theoretically help to keep rents lower because if the taxes rise on the landlord, the rent is guaranteed to rise on the tenant, since all landlords pass on all costs to their tenant(s). And yet, if a landlord is charging rent that has no correlation whatsoever to their mortgage, as seems likely in Portland since housing costs have risen exponentially in recent years, maybe some sort of fee should be in place? Or they should no longer be eligible for that tax benefit? In any event, something needs to be done about this structural problem, and yet I've never heard anyone associated with the city mention it. Below, please consider my line item changes to the RIP: I have reprinted the number and text of the existing proposal, with my proposed changes noted below, following a space. Housing Options and Scale 2.b. Scale the FAR to increase as the number of units increases on the site. Amend as to height: limit to surrounding houses. 2.c. Exclude attics and basements from FAR. Amend to include attics in FAR. In new constructions/remodels attics are*

rarely the traditional short-as-possible empty spaces we see in older houses, but function instead as additional floors and are being built-out and utilized as such, increasing the sellable/rentable square footage and, thus, the price. FAR as to height should be lowest point on property to roof peak. Keep basement exclusion, which would actually encourage basement construction, which is currently rare, since it's expensive. Most new construction lacks basements so far as I can tell (this is an anecdotal observation that I've noticed biking around town which I'm sure would be proven true if researched) but they're an easy way to add space that doesn't negatively impact neighbors, unlike tall attics. 2.d. Allow a bonus increase in FAR on the site if at least one of the units is affordable (80% median family income). Delete this. This bizarre definition of "affordable" is, quite frankly, total garbage. Of the 50 largest cities in the U.S., Portland has seen the fastest growth in the share of high-earning households. Thusly, median income here has increased 20% in the past 5 years. As I'm sure you can deduce, this is 100% NOT because working- and lower-middle-class Portlanders who have lived here awhile have seen dramatic wage increases recently; it's because a bunch of high-income earners have moved here, displacing lower-income earners. In fact, the average American worker, according to many oft-cited studies, has seen stagnant wages for the entire time I've been alive (i.e. since the Ford presidency). I myself have not had a wage increase in over 2 1/2 years, meaning I make less now than I did then, on account of general inflation and all manner of cost-of-living expenses that go up at an even more dramatic rate, like property taxes and healthcare costs. I expect these trends to continue. Basing anything related to housing on median family income does NOT translate into affordable. Randomly allowing larger buildings related to a non-existent metric is total garbage, and seems hand-crafted by developers. 2.e. Allow existing houses to add up to 250 sq ft every 5 years, regardless of building size limit. The phrase "regardless of building size limit" is weird and vague and I'm not sure what this means, and therefore can't address it, and I doubt I'm the only one. It's hard to parse. Does this mean I could turn my house into a 30-story building if I built it up by adding 250 sq ft in height every 5 years? Clarify explicitly what is meant, and amend to include a height restriction to similar to/less than surrounding houses. Building Design 8. Revise how height is measured (all zones). 8.a. Measure height from the lowest point near the house, not the highest point. Yes, but in addition clarify what "near" means, and have a procedure in place to prevent developers from figuring out the loophole(s) to this vague wording, as they surely will. 8.c. Continue to allow 2 1/2 story houses (30 feet high) on standard lots. Delete. Replace with, "All houses/plexes will now be "similar to, or lower in, height to existing houses on block." Thank you for considering my—and everyone else's—testimony. Some people are quite cynical about our chances of having any effect whatsoever on city policy through the public comment process, believing that city planners are beholden to developers but pretend to care what citizens think, a situation about which geographer Samuel Stein writes, "Planners must proceed with enough openness and transparency to maintain public legitimacy, while ensuring that capital retains ultimate control over the processes' parameters." I would so love to believe this isn't true here. It has been obvious to me since I was a teenager that massive, progressive structural economic change is needed throughout American society, and while I don't expect Portland to solve the nationwide housing availability/affordability crisis with one set of guidelines, let's at least try to not continue to

exacerbate the problems we already have or make them demonstrably worse. There are immense problems facing Portland, to say nothing of Oregon as a whole, related to housing and land use. As I'm sure you know, this past year saw a 10% increase in our state's homeless population. People are leaving the city, not because they want to, but because they can no longer afford to live here. I will say at the outset that I am not inherently opposed to duplexes, triplexes, and fourplexes in Portland on what were formally lots zoned single-family home. I would also like to note that it is not my neighborhood's "character," when that term is understood as a racialized code word, that I am concerned with protecting. My neighborhood is a multiracial working-class neighborhood and I would like it to stay that way. And I'm overjoyed that the city is finally doing something to mitigate the construction of monstrous maximum height, maximum square footage, maximum footprint, minimum setback luxury homes that sell for over a million dollars and are completely out-of-scale/out-of-price with nearby existing homes and are just plopped down amidst blocks of modest single-story houses in working- or middle-class neighborhoods (see, for one example among so very many, 1415 NE Going St, a particularly egregious instance of this that makes me physically ill every time I bike by it). This went on for way too long and I'm so glad it's potentially coming to an end. But I have some other concerns. There's a new construction single-family house going up one house down from mine, not right next door, but next to that one. This property used to be on one lot shared with the house that is next door to me and was split off when the house next to me was sold/flipped. The new construction going in is 4 bedrooms, 4 bathrooms, 2 1/2 stories, no basement, and extends in all directions as close to the property line as legally allowed, so, almost right up to neighboring fences. Some of these details not observable from the exterior, such as number of beds and baths, are gleaned from another neighbor, who saw the plans randomly one day while he was out walking his dogs and the developer happened to be there with the blueprints, otherwise I'd never know this information, since there is no requirement to inform neighbors. Why anyone needs four bathrooms in a single-family home I'll never know, to say nothing of four bedrooms, in this era of decreasing family size. I've shared a single-family home with as many as 9 other adults, and never had more than 1 1/2 baths. Every other house on this entire block, regardless of number of bedrooms, is single-story, modest footprint, modest square-footage. In fact, neighborhood-wide, there are few houses as large as this one, and likely none as tall. This design should never have been approved by the city. I never saw any plans for this new construction myself, was never informed about any of it, though it affects me. Why is that? If this were a duplex, triplex or fourplex I would not be opposed to the fact of it being a duplex+, but rather to, primarily, the total height and, secondarily, the footprint and square footage. Whoever buys this house will surely be far wealthier than anyone else around, and will not be bothered by that fact, nor by how their home looms over all of their new neighbors. How that will affect neighborhood dynamics and interpersonal interactions I can't say, but I'm not hopeful. I have also noticed that when this type of development goes in, it seems to encourage more of the same on the block/in the neighborhood, based on my anecdotal survey of demolitions and new construction, which I see a fair amount of up close since I bike for most of my transit and used to live in Boise-Eliot, a neighborhood that has been overrun with new construction. On the aforementioned block of NE Going between 14th and 15th, a corner house was recently for

sale. It sold immediately and was then demolished very quickly, possibly to avoid the 1/20/2020 shift to a 1940-or-earlier construction date requiring deconstruction rather than demolition. Guess what's going up in its place? You think it'll be affordable? You know the answer to these questions. I have lived in Portland since 2001, mostly in different North Portland neighborhoods, and have spent almost all of that time in group rental housing, which is—or was—quite common here: Multiple unrelated adults living in one rented single-family house. In mid-2017 I was no-cause evicted from my rental house of 8 years, where the landlord had promised me housing security for the rest of my life. I made life-altering decisions based on this promise, as one does, leaving one job for another, providing the landlord with countless hours of free labor maintaining the house and property, etc. I helped to create and maintain a large, productive vegetable/fruit garden, shared with many, to which I devoted more time and emotional energy than I could possibly tally and which I was forced to abruptly abandon. Most impactful, though, I didn't buy a house years earlier, though I had the means to do so financially, because I was promised housing security: I saw no reason to buy, when most of the benefits of owning a house, as I saw it, I already had. No-cause evictions still being legal at the time, I had 90 days to find another living situation—this after 2 years of 10% growth each year in the price of homes—and managed to find exactly one house I could (barely) afford to buy: East of 82nd, 1 bedroom, 680 square feet, ripped down to the studs inside by the previous owner. The only way I could buy it was with a FHA 203k Rehab Loan (research what that entails if you're curious about logistical/bureaucratic nightmares), and with the seller wanting to sell to a real person who actually wanted to remodel/live in the house longterm rather than any one of the four house flippers offering cash who would never live in the house, and just sell it at a profit. There was no city/state ordinance prohibiting or even dis-incentivizing selling to flippers at the time nor is there now; I just got lucky to find a seller willing to sell to a real person despite how tricky and time-consuming such a sale would be. I have no doubt that if the Residential Infill Project (RIP) guidelines had been implemented by then the house I now live in would have been demolished and a massive building put in its place. I've talked to other potential and actual homebuyers, on my economic level and above, and the competing-with-cash-offers thing is a BIG DEAL in Portland preventing folks from buying homes. RIP will exacerbate this widespread problem. Over two years later I'm still working on the house. In fact, it's quite taken over my life and I've had to stop doing many of the things that made up my life before. I'm doing as much of the work as possible myself since I have no disposable income (I don't even come close to making double my mortgage, thus squarely situating me within that cost-burdened camp of 1/3 of Americans who spend more than 1/3 of their income on housing) and also work full-time. The quality of the work I'm doing on the house has nothing to do with maximizing profit while minimizing investment, which is, sadly, what house flippers do. On the contrary, I bought the house to have what had just been taken from me in the no-cause eviction—security, autonomy, space to grow food—not to turn a quick profit. The level of the work I'm doing, the quality, it just has nothing to do with contemporary, throw-away construction. The house was built in 1912 and I'm trying to keep the work to the quality of that era: long-lasting, sustainable, quality craftsmanship: stain-grade fir trim around windows and doors, solid wood custom cabinetry which I will build myself, using reclaimed materials when possible,

etc. Outdoors I've ripped out useless, non-native shrubs, an unreal quantity of grass, and tilled soil by hand to put in a large, productive vegetable garden (fruit coming this spring), which supplies me with much of my produce year-round. Given all that, what would happen if that 2 1/2 story maximum height, maximum footprint suburban-style 4-BR house got built just to the south or west of me instead of one house down? What would happen if that 30' tall house was a duplex or a triplex or a fourplex? Regardless of the number of units, I'd lose most—if not all—of my sun, and therefore could not grow food, making my house worth nothing to me. But could I recoup my expenses in materials, labor, and emotional investment if I sold it? Nope. Not even close. And what could I do about that? Exactly nothing. I would not ever be compensated for that loss. Not now and not under the new RIP guidelines. And that's a huge problem, not only with RIP, but also with existing zoning regulations. There would be no notification to me or any other nearby homeowner of the proposed development. No review process. No assessment of whether Portland (or the world) needs more maximum height, maximum square-footage, maximum footprint, minimal setback, 4-bed, 4-bath houses. No process by which such a house would be critiqued vis-a-vis the city's own stated sustainability/climate change goals. No consideration of the decreased emotional/psychological value of my home to me, (to say nothing of the loss of economic value), a home that is inarguably actually consistent with sustainability/climate change goals due to its small size and productive year-round food garden. No consideration of what it feels like to have a house loom over all its neighbors like a cruise ship docked amidst rowboats. It would hardly matter if this new construction was a single-family home or a duplex or triplex: I could care less about the number of units. Its negative impact would be the same. How do you talk to somebody who's looking down on you? I'd rather see two, three, or four tiny houses on that lot than that hulking monolith. The RIP proposal, as well as city zoning/development regulations generally, need to be amended to consider the following: *Height of all new construction and remodels on residential streets needs to be similar to or less than other houses on the block. Any exceptions need to involve formal city notice to all nearby neighbors of building plans, giving them rights to submit comments as to negative impact, with greater weight given to neighbors closest in proximity and people who grow food or have already installed solar panels or have other situations which would be negatively affected by the loss of sunlight or other factors. Likewise, the poorest of neighbors, and those who have owned their homes for less time and, therefore, amassed less equity, making it harder for them to "just sell and move," or others with special circumstances I cannot foresee should be given more consideration than wealthier households with more economic flexibility. *Prevent perfectly fine existing homes from being demolished or drastically remodeled solely to increase their height/square footage/footprint so as to maximize developer profits when there is nothing structurally wrong with the house itself, all while decreasing the supply of more affordable housing (smaller, older houses are cheaper to buy/rent than bigger new/remodeled houses). It will be the smallest, most affordable houses in working-class neighborhoods such as mine that will be demolished (or remodeled so as to be unaffordable) under RIP, not the 3-story, 6000-square-foot mansions in Irvington, Laurelhurst, Alameda, Eastmoreland, or the West Hills. Many of these mansions, ironically, could easily be converted into spacious duplexes, even triplexes, or more, each plex far larger than the square

footage of my entire home, with barely a modification to their exteriors. The interior stairwell is often quite near the front door, so add a wall and a door here and there to create a dual entry, add an upstairs kitchen above the downstairs kitchen, add a downstairs shower, if there isn't one already, keep the basement as part of the first floor (or separate it off into its own apartment—this can usually happen quite easily: in older, large homes these basements are often quite livable since they have windows and full-height ceilings), and keep the attic as part of the second floor. Boom. With a modicum of interior work you've just doubled, possibly tripled, the number of units in some of the most desirable close-in neighborhoods in Portland, without changing much, if any, of the exterior of these houses, and with little impact to neighbors. Sadly, it's unlikely this'll happen anytime soon, if ever, since these are wealthy neighborhoods, and the wealthy always find a way to preserve their specialness. All Americans need to learn to live with less, but no one so much as the wealthy.

*Consider that upzoning has negative effects on existing affordable housing. Rapacious profiteering developers are already buying up housing at alarming rates, demolishing perfectly good homes, or tearing houses down to one wall and then calling what is essentially new construction a remodel to avoid the requirements and fees associated with new construction. This will continue and will, in fact, certainly accelerate under RIP. Address this problem now rather than later. (Related: very extensive remodels, such as what is occurring at 3014 NE 48th, to give just one example, should also trigger the deconstruction ordinance, not just demolitions. This is too big a loophole to allow. The entire 2nd floor and roof was removed, all the siding was removed, all the windows were removed, a major extension was built off the back of the first floor, and all of the interior walls were removed, and that's just what I was able to glean by biking by.) When single-family zoning is banned, new construction tends towards buildings that maximize profit for developers, i.e. duplexes+, which are then put up for sale; the only people who can afford to buy duplexes+ are far wealthier than the people who can buy single-family homes, thus decreasing/eliminating affordable home-ownership opportunities. *If the city can't outright ban it, figure out how to dis-incentivize homeowners selling to investors/flippers/developers/cash buyers (I don't even know what to call it all anymore) when there is a viable "regular" buyer who is not going to flip the house. The house across the street from me, the house two houses north of that one, the house across the street from that one, etc., all got flipped just since I bought my house 2 years ago. The house next door to me got flipped not long before I bought mine. My house, too, would have been flipped had I not bought it, as I mentioned earlier. This increases prices unnecessarily for a number of reasons, including that flippers often add bedrooms/baths, even when that creates weird, ultra-tiny rooms that aren't natural to the house layout, even when the house is super-small, or an idiotic number of bathrooms for a house that would never need more than one, just to up the sale price. One rarely hears anymore about people like me—the person who could only afford the derelict house and is doing the rehab work themselves. Flippers have prevented that. Many homeowners in Portland who renovated their houses themselves would not even own their homes if what is happening now had been happening 10 or 15 years ago because they didn't have to compete with cash offers: The "fixer-upper" used to be a thing, now it is not. Flipping is also unsustainable practice from a building materials perspective and therefore inconsistent with the city's stated sustainability/climate change goals: Much of what

gets installed in a flipped house is unnecessary and also brand new and eventually gets ripped out and likely ends up in a landfill since it is generic garbage to no-one's taste and is likely not being salvaged. House flipping has contributed significantly to the decrease in affordable home-ownership opportunities for low to moderate income-earners in Portland. (Recently, large high-end houses in wealthy neighborhoods like Alameda are also being flipped, but since the wealthy have so many more options, I'll not discuss that more-recent trend here and will let them write their own letter.) The RIP does nothing to address this problem and will definitely exacerbate it. *Consider ecosystem collapse/climate change/other environmental concerns. RIP will contribute to/accelerate loss of green space. Portland has a significant amount of green space and a longstanding history that has continued into the present of urban farms (RF-zoned property is luckily exempt from RIP for some unexplained reason), community and home gardens, including productive food gardens, as well as a supportive network of nonprofits surrounding this, such as the Portland Fruit Tree Project and Growing Gardens, as well as all the school garden projects, the Oregon Food Bank's farm in NE Portland, and the OSU Beginning Urban Farmer Apprenticeship program, which shares farm/garden space in SE Portland with the PSU Sustainability Education Program farm, the OSU Master Gardeners' demonstration gardens, a community garden, garden space reserved for recent immigrants, a large orchard tended by Portland Fruit Tree Project volunteers, and Portland Public Schools. What is the waitlist for the city's community garden plots? Last I checked it was 2 years at some gardens. The RIP is obviously not addressing this demonstrated need. OSU has produced studies determining that home gardens will be increasingly important for community food security, climate moderation, and biodiversity conservation. A surprising amount of food and pollinator habitat can be grown on a regular city lot—especially if the house on that lot is moderately sized—without a lot of space. What is needed? Sun. Max height new construction/remodel can irrevocably change that by blocking it. The economic costs/benefits of home gardening have been studied and the conclusion is that it's economically worth it to grow your own food, to say nothing of all the other proven non-economic benefits. *Consider how many giant parking lots and garages there are in the city and how this is normalized/considered necessary, to say nothing of street space itself. Transportation and housing issues are interconnected. Coordinate with the transportation department to dis-incentivize driving everywhere all the time, making underutilized space now prioritized for cars available for housing without demolishing existing homes. There are scads of examples of this around town, but I'll just mention one near me: The US Bank parking lot at 68th and NE Glisan. What a great example of a total waste of space: I've never seen more than 4 vehicles parked in this lot at any one time, there's copious nearby street parking available, yet the lot takes up the entire length of a city block on Glisan, which of course includes the bank building itself, but still. Start regulating/restricting the size of commercial buildings and their parking lots, to say nothing of restricting their construction in the first place. (How many bars, restaurants, and expensive tchotchke shops does one city need anyway?) This is a prime location for a larger residential building on a major thoroughfare near mass transit and established bikeways that wouldn't negatively impact that many homeowners, or likely even necessitate a zoning change. Another example near my house, which I bike by almost every day, is the old corporate headquarters of Banfield Pet Hospital on NE

82nd and Tillamook. It's a giant empty parking lot with an empty building attached. It was a citizen-financed corporate boondoggle, the old story of a corporation dangling the magical stardust of *JOBS!* in front of the city in exchange for the type of egregious tax benefit that could've instead funded affordable housing (or other important things). As quick as could be they quit Portland for VanWA. The building's been empty ever since. How much housing could be there now, in that giant, empty parking lot? (After sitting empty for so long, this building is just now turning into something else, but the parking lot will still be just as grotesquely large, considering how close to bikeways and transit it is. Residential neighborhoods near transit are deemed prime for the most invasive and disruptive upzoning and redevelopment; commercial properties, it seems, are exempt.)

*Consider that building market-rate housing will never deliver the amount of housing people need at prices they can afford. New development will not be affordable. The supply-demand market argument has been proven false. Inclusionary zoning laws have fatal loopholes. *Consider real public housing on the land trust model. Taking housing units permanently off the market is the only long-term solution to the housing crisis. Developers and investors need to be disempowered. All buildings—regardless of number of units—with tenants that are put up for sale need to be offered first to tenants to purchase collectively and turn into co-operative housing. (Related to this, research housing co-operatives in other cities.) It's a tragedy Portland didn't go down this road earlier, when housing was much more affordable. Nationwide, 4 million formerly owner-occupied houses became investor-owned after the 2008 recession. I don't know what the percentage of that number is in Portland, but this is a huge problem. Similarly, there are a lot of Portland renters living in single-family homes (as opposed to plexes or large apartment buildings), some of which have been owned by the same person/people for a very long time, and these houses therefore have very affordable mortgages. What percentage of landlords of these buildings are charging rents that have any correlation whatsoever with their mortgage? Federally, rental income is taxed at a rate about half that of wage income. I see how this can theoretically help to keep rents lower because if the taxes rise on the landlord, the rent is guaranteed to rise on the tenant, since all landlords pass on all costs to their tenant(s). And yet, if a landlord is charging rent that has no correlation whatsoever to their mortgage, as seems likely in Portland since housing costs have risen exponentially in recent years, maybe some sort of fee should be in place? Or they should no longer be eligible for that tax benefit? In any event, something needs to be done about this structural problem, and yet I've never heard anyone associated with the city mention it. Below, please consider my line item changes to the RIP: I have reprinted the number and text of the existing proposal, with my proposed changes noted below, following a space. Housing Options and Scale 2.b. Scale the FAR to increase as the number of units increases on the site. Amend as to height: limit to surrounding houses. 2.c. Exclude attics and basements from FAR. Amend to include attics in FAR. In new constructions/remodels attics are rarely the traditional short-as-possible empty spaces we see in older houses, but function instead as additional floors and are being built-out and utilized as such, increasing the sellable/rentable square footage and, thus, the price. FAR as to height should be lowest point on property to roof peak. Keep basement exclusion, which would actually encourage basement construction, which is currently rare, since it's expensive. Most new construction lacks basements so far as I can tell (this is an anecdotal

observation that I've noticed biking around town which I'm sure would be proven true if researched) but they're an easy way to add space that doesn't negatively impact neighbors, unlike tall attics. 2.d. Allow a bonus increase in FAR on the site if at least one of the units is affordable (80% median family income). Delete this. This bizarre definition of "affordable" is, quite frankly, total garbage. Of the 50 largest cities in the U.S., Portland has seen the fastest growth in the share of high-earning households. Thusly, median income here has increased 20% in the past 5 years. As I'm sure you can deduce, this is 100% NOT because working- and lower-middle-class Portlanders who have lived here awhile have seen dramatic wage increases recently; it's because a bunch of high-income earners have moved here, displacing lower-income earners. In fact, the average American worker, according to many oft-cited studies, has seen stagnant wages for the entire time I've been alive (i.e. since the Ford presidency). I myself have not had a wage increase in over 2 1/2 years, meaning I make less now than I did then, on account of general inflation and all manner of cost-of-living expenses that go up at an even more dramatic rate, like property taxes and healthcare costs. I expect these trends to continue. Basing anything related to housing on median family income does NOT translate into affordable. Randomly allowing larger buildings related to a non-existent metric is total garbage, and seems hand-crafted by developers. 2.e. Allow existing houses to add up to 250 sq ft every 5 years, regardless of building size limit. The phrase "regardless of building size limit" is weird and vague and I'm not sure what this means, and therefore can't address it, and I doubt I'm the only one. It's hard to parse. Does this mean I could turn my house into a 30-story building if I built it up by adding 250 sq ft in height every 5 years? Clarify explicitly what is meant, and amend to include a height restriction to similar to/less than surrounding houses. Building Design 8. Revise how height is measured (all zones). 8.a. Measure height from the lowest point near the house, not the highest point. Yes, but in addition clarify what "near" means, and have a procedure in place to prevent developers from figuring out the loophole(s) to this vague wording, as they surely will. 8.c. Continue to allow 2 1/2 story houses (30 feet high) on standard lots. Delete. Replace with, "All houses/plexes will now be "similar to, or lower in, height to existing houses on block." Thank you for considering my—and everyone else's—testimony. Some people are quite cynical about our chances of having any effect whatsoever on city policy through the public comment process, believing that city planners are beholden to developers but pretend to care what citizens think, a situation about which geographer Samuel Stein writes, "Planners must proceed with enough openness and transparency to maintain public legitimacy, while ensuring that capital retains ultimate control over the processes' parameters." I would so love to believe this isn't true here. It has been obvious to me since I was a teenager that massive, progressive structural economic change is needed throughout American society, and while I don't expect Portland to solve the nationwide housing availability/affordability crisis with one set of guidelines, let's at least try to not continue to exacerbate the problems we already have or make them demonstrably worse. There are immense problems facing Portland, to say nothing of Oregon as a whole, related to housing and land use. As I'm sure you know, this past year saw a 10% increase in our state's homeless population. People are leaving the city, not because they want to, but because they can no longer afford to live here. I will say at the outset that I am not inherently opposed to duplexes, triplexes, and fourplexes in Portland

on what were formally lots zoned single-family home. I would also like to note that it is not my neighborhood's "character," when that term is understood as a racialized code word, that I am concerned with protecting. My neighborhood is a multiracial working-class neighborhood and I would like it to stay that way. And I'm overjoyed that the city is finally doing something to mitigate the construction of monstrous maximum height, maximum square footage, maximum footprint, minimum setback luxury homes that sell for over a million dollars and are completely out-of-scale/out-of-price with nearby existing homes and are just plopped down amidst blocks of modest single-story houses in working- or middle-class neighborhoods (see, for one example among so very many, 1415 NE Going St, a particularly egregious instance of this that makes me physically ill every time I bike by it). This went on for way too long and I'm so glad it's potentially coming to an end. But I have some other concerns. There's a new construction single-family house going up one house down from mine, not right next door, but next to that one. This property used to be on one lot shared with the house that is next door to me and was split off when the house next to me was sold/flipped. The new construction going in is 4 bedrooms, 4 bathrooms, 2 1/2 stories, no basement, and extends in all directions as close to the property line as legally allowed, so, almost right up to neighboring fences. Some of these details not observable from the exterior, such as number of beds and baths, are gleaned from another neighbor, who saw the plans randomly one day while he was out walking his dogs and the developer happened to be there with the blueprints, otherwise I'd never know this information, since there is no requirement to inform neighbors. Why anyone needs four bathrooms in a single-family home I'll never know, to say nothing of four bedrooms, in this era of decreasing family size. I've shared a single-family home with as many as 9 other adults, and never had more than 1 1/2 baths. Every other house on this entire block, regardless of number of bedrooms, is single-story, modest footprint, modest square-footage. In fact, neighborhood-wide, there are few houses as large as this one, and likely none as tall. This design should never have been approved by the city. I never saw any plans for this new construction myself, was never informed about any of it, though it affects me. Why is that? If this were a duplex, triplex or fourplex I would not be opposed to the fact of it being a duplex+, but rather to, primarily, the total height and, secondarily, the footprint and square footage. Whoever buys this house will surely be far wealthier than anyone else around, and will not be bothered by that fact, nor by how their home looms over all of their new neighbors. How that will affect neighborhood dynamics and interpersonal interactions I can't say, but I'm not hopeful. I have also noticed that when this type of development goes in, it seems to encourage more of the same on the block/in the neighborhood, based on my anecdotal survey of demolitions and new construction, which I see a fair amount of up close since I bike for most of my transit and used to live in Boise-Eliot, a neighborhood that has been overrun with new construction. On the aforementioned block of NE Going between 14th and 15th, a corner house was recently for sale. It sold immediately and was then demolished very quickly, possibly to avoid the 1/20/2020 shift to a 1940-or-earlier construction date requiring deconstruction rather than demolition. Guess what's going up in its place? You think it'll be affordable? You know the answer to these questions. I have lived in Portland since 2001, mostly in different North Portland neighborhoods, and have spent almost all of that time in group rental housing, which is—or

was—quite common here: Multiple unrelated adults living in one rented single-family house. In mid-2017 I was no-cause evicted from my rental house of 8 years, where the landlord had promised me housing security for the rest of my life. I made life-altering decisions based on this promise, as one does, leaving one job for another, providing the landlord with countless hours of free labor maintaining the house and property, etc. I helped to create and maintain a large, productive vegetable/fruit garden, shared with many, to which I devoted more time and emotional energy than I could possibly tally and which I was forced to abruptly abandon. Most impactful, though, I didn't buy a house years earlier, though I had the means to do so financially, because I was promised housing security: I saw no reason to buy, when most of the benefits of owning a house, as I saw it, I already had. No-cause evictions still being legal at the time, I had 90 days to find another living situation—this after 2 years of 10% growth each year in the price of homes—and managed to find exactly one house I could (barely) afford to buy: East of 82nd, 1 bedroom, 680 square feet, ripped down to the studs inside by the previous owner. The only way I could buy it was with a FHA 203k Rehab Loan (research what that entails if you're curious about logistical/bureaucratic nightmares), and with the seller wanting to sell to a real person who actually wanted to remodel/live in the house longterm rather than any one of the four house flippers offering cash who would never live in the house, and just sell it at a profit. There was no city/state ordinance prohibiting or even dis-incentivizing selling to flippers at the time nor is there now; I just got lucky to find a seller willing to sell to a real person despite how tricky and time-consuming such a sale would be. I have no doubt that if the Residential Infill Project (RIP) guidelines had been implemented by then the house I now live in would have been demolished and a massive building put in its place. I've talked to other potential and actual homebuyers, on my economic level and above, and the competing-with-cash-offers thing is a BIG DEAL in Portland preventing folks from buying homes. RIP will exacerbate this widespread problem. Over two years later I'm still working on the house. In fact, it's quite taken over my life and I've had to stop doing many of the things that made up my life before. I'm doing as much of the work as possible myself since I have no disposable income (I don't even come close to making double my mortgage, thus squarely situating me within that cost-burdened camp of 1/3 of Americans who spend more than 1/3 of their income on housing) and also work full-time. The quality of the work I'm doing on the house has nothing to do with maximizing profit while minimizing investment, which is, sadly, what house flippers do. On the contrary, I bought the house to have what had just been taken from me in the no-cause eviction—security, autonomy, space to grow food—not to turn a quick profit. The level of the work I'm doing, the quality, it just has nothing to do with contemporary, throw-away construction. The house was built in 1912 and I'm trying to keep the work to the quality of that era: long-lasting, sustainable, quality craftsmanship: stain-grade fir trim around windows and doors, solid wood custom cabinetry which I will build myself, using reclaimed materials when possible, etc. Outdoors I've ripped out useless, non-native shrubs, an unreal quantity of grass, and tilled soil by hand to put in a large, productive vegetable garden (fruit coming this spring), which supplies me with much of my produce year-round. Given all that, what would happen if that 2 1/2 story maximum height, maximum footprint suburban-style 4-BR house got built just to the south or west of me instead of

one house down? What would happen if that 30' tall house was a duplex or a triplex or a fourplex? Regardless of the number of units, I'd lose most—if not all—of my sun, and therefore could not grow food, making my house worth nothing to me. But could I recoup my expenses in materials, labor, and emotional investment if I sold it? Nope. Not even close. And what could I do about that? Exactly nothing. I would not ever be compensated for that loss. Not now and not under the new RIP guidelines. And that's a huge problem, not only with RIP, but also with existing zoning regulations. There would be no notification to me or any other nearby homeowner of the proposed development. No review process. No assessment of whether Portland (or the world) needs more maximum height, maximum square-footage, maximum footprint, minimal setback, 4-bed, 4-bath houses. No process by which such a house would be critiqued vis-a-vis the city's own stated sustainability/climate change goals. No consideration of the decreased emotional/psychological value of my home to me, (to say nothing of the loss of economic value), a home that is inarguably actually consistent with sustainability/climate change goals due to its small size and productive year-round food garden. No consideration of what it feels like to have a house loom over all its neighbors like a cruise ship docked amidst rowboats. It would hardly matter if this new construction was a single-family home or a duplex or triplex: I could care less about the number of units. Its negative impact would be the same. How do you talk to somebody who's looking down on you? I'd rather see two, three, or four tiny houses on that lot than that hulking monolith. The RIP proposal, as well as city zoning/development regulations generally, need to be amended to consider the following: *Height of all new construction and remodels on residential streets needs to be similar to or less than other houses on the block. Any exceptions need to involve formal city notice to all nearby neighbors of building plans, giving them rights to submit comments as to negative impact, with greater weight given to neighbors closest in proximity and people who grow food or have already installed solar panels or have other situations which would be negatively affected by the loss of sunlight or other factors. Likewise, the poorest of neighbors, and those who have owned their homes for less time and, therefore, amassed less equity, making it harder for them to "just sell and move," or others with special circumstances I cannot foresee should be given more consideration than wealthier households with more economic flexibility. *Prevent perfectly fine existing homes from being demolished or drastically remodeled solely to increase their height/square footage/footprint so as to maximize developer profits when there is nothing structurally wrong with the house itself, all while decreasing the supply of more affordable housing (smaller, older houses are cheaper to buy/rent than bigger new/remodeled houses). It will be the smallest, most affordable houses in working-class neighborhoods such as mine that will be demolished (or remodeled so as to be unaffordable) under RIP, not the 3-story, 6000-square-foot mansions in Irvington, Laurelhurst, Alameda, Eastmoreland, or the West Hills. Many of these mansions, ironically, could easily be converted into spacious duplexes, even triplexes, or more, each plex far larger than the square footage of my entire home, with barely a modification to their exteriors. The interior stairwell is often quite near the front door, so add a wall and a door here and there to create a dual entry, add an upstairs kitchen above the downstairs kitchen, add a downstairs shower, if there isn't one already, keep the basement as part of the first floor (or separate it off into its own apartment—this can usually happen quite easily: in

older, large homes these basements are often quite livable since they have windows and full-height ceilings), and keep the attic as part of the second floor. Boom. With a modicum of interior work you've just doubled, possibly tripled, the number of units in some of the most desirable close-in neighborhoods in Portland, without changing much, if any, of the exterior of these houses, and with little impact to neighbors. Sadly, it's unlikely this'll happen anytime soon, if ever, since these are wealthy neighborhoods, and the wealthy always find a way to preserve their specialness. All Americans need to learn to live with less, but no one so much as the wealthy. *Consider that upzoning has negative effects on existing affordable housing. Rapacious profiteering developers are already buying up housing at alarming rates, demolishing perfectly good homes, or tearing houses down to one wall and then calling what is essentially new construction a remodel to avoid the requirements and fees associated with new construction. This will continue and will, in fact, certainly accelerate under RIP. Address this problem now rather than later. (Related: very extensive remodels, such as what is occurring at 3014 NE 48th, to give just one example, should also trigger the deconstruction ordinance, not just demolitions. This is too big a loophole to allow. The entire 2nd floor and roof was removed, all the siding was removed, all the windows were removed, a major extension was built off the back of the first floor, and all of the interior walls were removed, and that's just what I was able to glean by biking by.) When single-family zoning is banned, new construction tends towards buildings that maximize profit for developers, i.e. duplexes+, which are then put up for sale; the only people who can afford to buy duplexes+ are far wealthier than the people who can buy single-family homes, thus decreasing/eliminating affordable home-ownership opportunities. *If the city can't outright ban it, figure out how to dis-incentivize homeowners selling to investors/flippers/developers/cash buyers (I don't even know what to call it all anymore) when there is a viable "regular" buyer who is not going to flip the house. The house across the street from me, the house two houses north of that one, the house across the street from that one, etc., all got flipped just since I bought my house 2 years ago. The house next door to me got flipped not long before I bought mine. My house, too, would have been flipped had I not bought it, as I mentioned earlier. This increases prices unnecessarily for a number of reasons, including that flippers often add bedrooms/baths, even when that creates weird, ultra-tiny rooms that aren't natural to the house layout, even when the house is super-small, or an idiotic number of bathrooms for a house that would never need more than one, just to up the sale price. One rarely hears anymore about people like me—the person who could only afford the derelict house and is doing the rehab work themselves. Flippers have prevented that. Many homeowners in Portland who renovated their houses themselves would not even own their homes if what is happening now had been happening 10 or 15 years ago because they didn't have to compete with cash offers: The "fixer-upper" used to be a thing, now it is not. Flipping is also unsustainable practice from a building materials perspective and therefore inconsistent with the city's stated sustainability/climate change goals: Much of what gets installed in a flipped house is unnecessary and also brand new and eventually gets ripped out and likely ends up in a landfill since it is generic garbage to no-one's taste and is likely not being salvaged. House flipping has contributed significantly to the decrease in affordable home-ownership opportunities for low to moderate income-earners in Portland. (Recently, large high-end houses in

wealthy neighborhoods like Alameda are also being flipped, but since the wealthy have so many more options, I'll not discuss that more-recent trend here and will let them write their own letter.) The RIP does nothing to address this problem and will definitely exacerbate it. *Consider ecosystem collapse/climate change/other environmental concerns. RIP will contribute to/accelerate loss of green space. Portland has a significant amount of green space and a longstanding history that has continued into the present of urban farms (RF-zoned property is luckily exempt from RIP for some unexplained reason), community and home gardens, including productive food gardens, as well as a supportive network of nonprofits surrounding this, such as the Portland Fruit Tree Project and Growing Gardens, as well as all the school garden projects, the Oregon Food Bank's farm in NE Portland, and the OSU Beginning Urban Farmer Apprenticeship program, which shares farm/garden space in SE Portland with the PSU Sustainability Education Program farm, the OSU Master Gardeners' demonstration gardens, a community garden, garden space reserved for recent immigrants, a large orchard tended by Portland Fruit Tree Project volunteers, and Portland Public Schools. What is the waitlist for the city's community garden plots? Last I checked it was 2 years at some gardens. The RIP is obviously not addressing this demonstrated need. OSU has produced studies determining that home gardens will be increasingly important for community food security, climate moderation, and biodiversity conservation. A surprising amount of food and pollinator habitat can be grown on a regular city lot—especially if the house on that lot is moderately sized—without a lot of space. What is needed? Sun. Max height new construction/remodel can irrevocably change that by blocking it. The economic costs/benefits of home gardening have been studied and the conclusion is that it's economically worth it to grow your own food, to say nothing of all the other proven non-economic benefits. *Consider how many giant parking lots and garages there are in the city and how this is normalized/considered necessary, to say nothing of street space itself. Transportation and housing issues are interconnected. Coordinate with the transportation department to dis-incentivize driving everywhere all the time, making underutilized space now prioritized for cars available for housing without demolishing existing homes. There are scads of examples of this around town, but I'll just mention one near me: The US Bank parking lot at 68th and NE Glisan. What a great example of a total waste of space: I've never seen more than 4 vehicles parked in this lot at any one time, there's copious nearby street parking available, yet the lot takes up the entire length of a city block on Glisan, which of course includes the bank building itself, but still. Start regulating/restricting the size of commercial buildings and their parking lots, to say nothing of restricting their construction in the first place. (How many bars, restaurants, and expensive tchotchke shops does one city need anyway?) This is a prime location for a larger residential building on a major thoroughfare near mass transit and established bikeways that wouldn't negatively impact that many homeowners, or likely even necessitate a zoning change. Another example near my house, which I bike by almost every day, is the old corporate headquarters of Banfield Pet Hospital on NE 82nd and Tillamook. It's a giant empty parking lot with an empty building attached. It was a citizen-financed corporate boondoggle, the old story of a corporation dangling the magical stardust of *JOBS!* in front of the city in exchange for the type of egregious tax benefit that could've instead funded affordable housing (or other important things). As quick as could be they quit

Portland for VanWA. The building's been empty ever since. How much housing could be there now, in that giant, empty parking lot? (After sitting empty for so long, this building is just now turning into something else, but the parking lot will still be just as grotesquely large, considering how close to bikeways and transit it is. Residential neighborhoods near transit are deemed prime for the most invasive and disruptive upzoning and redevelopment; commercial properties, it seems, are exempt.)

*Consider that building market-rate housing will never deliver the amount of housing people need at prices they can afford. New development will not be affordable. The supply-demand market argument has been proven false. Inclusionary zoning laws have fatal loopholes. *Consider real public housing on the land trust model. Taking housing units permanently off the market is the only long-term solution to the housing crisis. Developers and investors need to be disempowered. All buildings—regardless of number of units—with tenants that are put up for sale need to be offered first to tenants to purchase collectively and turn into co-operative housing. (Related to this, research housing co-operatives in other cities.) It's a tragedy Portland didn't go down this road earlier, when housing was much more affordable. Nationwide, 4 million formerly owner-occupied houses became investor-owned after the 2008 recession. I don't know what the percentage of that number is in Portland, but this is a huge problem. Similarly, there are a lot of Portland renters living in single-family homes (as opposed to plexes or large apartment buildings), some of which have been owned by the same person/people for a very long time, and these houses therefore have very affordable mortgages. What percentage of landlords of these buildings are charging rents that have any correlation whatsoever with their mortgage? Federally, rental income is taxed at a rate about half that of wage income. I see how this can theoretically help to keep rents lower because if the taxes rise on the landlord, the rent is guaranteed to rise on the tenant, since all landlords pass on all costs to their tenant(s). And yet, if a landlord is charging rent that has no correlation whatsoever to their mortgage, as seems likely in Portland since housing costs have risen exponentially in recent years, maybe some sort of fee should be in place? Or they should no longer be eligible for that tax benefit? In any event, something needs to be done about this structural problem, and yet I've never heard anyone associated with the city mention it. Below, please consider my line item changes to the RIP: I have reprinted the number and text of the existing proposal, with my proposed changes noted below, following a space. Housing Options and Scale 2.b. Scale the FAR to increase as the number of units increases on the site. Amend as to height: limit to surrounding houses. 2.c. Exclude attics and basements from FAR. Amend to include attics in FAR. In new constructions/remodels attics are rarely the traditional short-as-possible empty spaces we see in older houses, but function instead as additional floors and are being built-out and utilized as such, increasing the sellable/rentable square footage and, thus, the price. FAR as to height should be lowest point on property to roof peak. Keep basement exclusion, which would actually encourage basement construction, which is currently rare, since it's expensive. Most new construction lacks basements so far as I can tell (this is an anecdotal observation that I've noticed biking around town which I'm sure would be proven true if researched) but they're an easy way to add space that doesn't negatively impact neighbors, unlike tall attics. 2.d. Allow a bonus increase in FAR on the site if at least one of the units is affordable (80% median family income). Delete this. This bizarre definition of "affordable" is, quite frankly, total garbage. Of

the 50 largest cities in the U.S., Portland has seen the fastest growth in the share of high-earning households. Thusly, median income here has increased 20% in the past 5 years. As I'm sure you can deduce, this is 100% NOT because working- and lower-middle-class Portlanders who have lived here awhile have seen dramatic wage increases recently; it's because a bunch of high-income earners have moved here, displacing lower-income earners. In fact, the average American worker, according to many oft-cited studies, has seen stagnant wages for the entire time I've been alive (i.e. since the Ford presidency). I myself have not had a wage increase in over 2 1/2 years, meaning I make less now than I did then, on account of general inflation and all manner of cost-of-living expenses that go up at an even more dramatic rate, like property taxes and healthcare costs. I expect these trends to continue. Basing anything related to housing on median family income does NOT translate into affordable. Randomly allowing larger buildings related to a non-existent metric is total garbage, and seems hand-crafted by developers. 2.e. Allow existing houses to add up to 250 sq ft every 5 years, regardless of building size limit. The phrase "regardless of building size limit" is weird and vague and I'm not sure what this means, and therefore can't address it, and I doubt I'm the only one. It's hard to parse. Does this mean I could turn my house into a 30-story building if I built it up by adding 250 sq ft in height every 5 years? Clarify explicitly what is meant, and amend to include a height restriction to similar to/less than surrounding houses. Building Design 8. Revise how height is measured (all zones). 8.a. Measure height from the lowest point near the house, not the highest point. Yes, but in addition clarify what "near" means, and have a procedure in place to prevent developers from figuring out the loophole(s) to this vague wording, as they surely will. 8.c. Continue to allow 2 1/2 story houses (30 feet high) on standard lots. Delete. Replace with, "All houses/plexes will now be "similar to, or lower in, height to existing houses on block." Thank you for considering my—and everyone else's—testimony. Some people are quite cynical about our chances of having any effect whatsoever on city policy through the public comment process, believing that city planners are beholden to developers but pretend to care what citizens think, a situation about which geographer Samuel Stein writes, "Planners must proceed with enough openness and transparency to maintain public legitimacy, while ensuring that capital retains ultimate control over the processes' parameters." I would so love to believe this isn't true here. It has been obvious to me since I was a teenager that massive, progressive structural economic change is needed throughout American society, and while I don't expect Portland to solve the nationwide housing availability/affordability crisis with one set of guidelines, let's at least try to not continue to exacerbate the problems we already have or make them demonstrably worse. Testimony included as an attached file as I was not able to paste into this box.

Testimony is presented without formatting.

Nancy Lin

#83021 | January 15, 2020

Testimony to **Portland City Council** on the **Residential Infill Project, Recommended Draft**

When my husband and I were looking to move to Portland, OR from downtown Chicago, IL, we wanted to live “close” in from downtown Portland but still live in a neighborhood that was walkable, and have a neighborhood feel with sidewalk and streets that allow kids to be able to bike safely. We chose Laurelhurst neighborhood because of all those qualities, hence why Laurelhurst was designated an historic neighborhood so that my neighborhood would remain with single family home. We know that Portland is growing into a larger city and changes need to happen. RIP is based on offering high density affordable housing but the average cost of housing is outside the range of “average” families. Additionally without better and more frequent connect metro transit, RIP will just add more cars on the roadways, less available parking and more traffic jams. Before approving RIP, consider improving the roadways—more traffic lanes on I-5, 405, 84 and a better bridge before destroying existing neighborhoods. Please vote NO on RIP.

Testimony is presented without formatting.

Recommendations to Residential Infill Code Change Project Anti-Displacement PDX | January 2020

Endorsed by the following members: Asian Pacific American Network of Oregon, Community Alliance of Tenants, Cully Housing Action Team, OPAL Environmental Justice Oregon, Portland African American Leadership Forum, 1000 Friends of Oregon

Anti-Displacement PDX supports the Residential Infill Project's goal of diversifying and expanding the number of homes in Portland's often-exclusive single-dwelling zones. However, for this code change to be truly equitable -- rather than simply adding housing supply -- it must include measures that support the production of regulated affordable homes and provide more stability for renters.

The Housing Bureau reports for a fourth year in a row that average rents and home prices in most Portland neighborhoods are out of reach for indigenous people, people of color, immigrants and refugees, and older adults. Even more alarming, there are *no* neighborhoods affordable to the average Black household or single parent with children.¹ Even as more apartments are developed in many neighborhoods, continued rent increases mean that there are fewer homes accessible to these communities. Portlanders continue to be displaced, seeking affordable rents in cities across the metro region.

Portland's 2035 Comprehensive Plan requires that all land use decisions respond to and proactively prevent these disproportionate impacts to Black, indigenous, and people of color. It is critical that we include anti-displacement measures in any policy that affects housing production and induces changes in the market -- including the Residential Infill Project.

We call on City Council to support the stability of our communities, and the creation of new opportunities for Black, indigenous, people of color and low-income Portlanders to live in neighborhoods of their choice -- including the choice to return to neighborhoods from which they have been displaced. **To transform this housing-supply policy into an equitable housing policy, the Residential Infill Project should be amended to include the following provisions:**

1. Incentives for developers to build regulated affordable units

These incentives make it more feasible for non-profit developers to build affordable infill housing, and incentivize for-profit developers to include at least one affordable unit.

- A. **Density bonus:** The RIP Recommended Draft allows four units on all lots without any affordability requirements. Instead, allow only three units on all lots by-right, but up to six units if all units beyond the first three are regulated to be affordable at 60% MFI. Provide a meaningful FAR increase (plus height and/or lot-coverage increases, if

¹ 2018 State of Housing Report, pp. 31-35; Portland Housing Bureau <https://www.portlandoregon.gov/phb/article/707182>

needed) along with any bonus units. Allow developers to pay an in lieu fee as an alternative to developing affordable units on-site, with revenue going to subsidize regulated affordable units in single-dwelling zones.

- B. **Waive the Construction Excise Tax (CET)** for the entire project, in return for at least one regulated affordable unit on-site (60% MFI).
- C. **Waive or reduce the System Development Charges (SDCs)** for the entire project, in return for at least one regulated affordable unit on-site (60% MFI).
- D. **Property tax exemption** for any regulated affordable units built on-site, for the duration of the affordability restriction.

2. Subsidies for affordable units

Create a dedicated source of funding to help developers acquire properties and build regulated affordable homes in the single-dwelling zones.

- A. **Earmark Construction Excise Tax (CET) revenue from construction in single-dwelling zones** as a source of subsidy for affordable units in single-dwelling zones. This does not require any new fees on development.
- B. **Charge a fee for any redevelopment of a RIP-eligible property that does *not* include at least two units, unless prevented by site constraints.** This provision would discourage the 1-to-1 replacement of a demolished home, and instead encourage additional, more affordable housing options. Use the new revenue from this fee to subsidize regulated affordable units in the single-dwelling zones.

3. Tools for tenant stability - (will likely need to exist outside of the zoning code)

These measures provide greater stability for renters in single-dwelling zones, who are already vulnerable to displacement as a result of both rent increases and redevelopment.

NOTE: These policies should be extended to all renters, not just those living in RIP zones.

- A. Require **advance written notice to tenants** if the owner plans to sell the property or applies for permits for demolition or redevelopment.
- B. **A “right to stay” for existing tenants to remain in their neighborhoods** by renting a unit on a redeveloped property at a cost comparable to what they had been paying, or by purchasing a unit with down-payment assistance.
- C. Any **Tenant Opportunity to Purchase** policy enacted by City Council must apply to all renters, including those living in single-dwelling zones.

Nicole Johnson

#83044 | January 15, 2020

Testimony to **Portland City Council** on the **Residential Infill Project, Recommended Draft**

Testimony attached

Testimony is presented without formatting.

Tony Greiner

#83141 | January 15, 2020

Testimony to **Portland City Council** on the **Residential Infill Project, Recommended Draft**

If you have been reading your constituent emails, you know that the Residential Infill Project is one that will cause more problems than it will solve. Even if PollyAnna is right this time and somehow everything will work out okay, consider that between HB 2001 and the so-called "Better Housing by Design" initiative, two major changes in Portland's zoning have been implemented in the last year. Let's work those out, see how things develop, and not add a third program to the mix. If HB 2001 and Better Housing by Design do the job that it is claimed they will do, there really isn't a point to RIP. If those programs fail to produce affordable housing, then re-consider RIP at a future date.

Testimony is presented without formatting.

Jeanne Henry

#83148 | January 15, 2020

Testimony to **Portland City Council** on the **Residential Infill Project, Recommended Draft**

I posted a comment last week but want to add: I have owned a home in inner SE for 45 years. Our current home is now an Audubon certified wildlife habitat. I had not addressed the importance of INCREASING tree canopy, rather than PAVE PARADISE. Jeanne Henry 3290 SE.

HarrisonPortland 97214 RE: Testimony Opposing the Residential Infill Project RIP is being promoted as a solution to the housing affordability crisis. However, the analysis commissioned by the City of Portland showed that rezoning all single-family lots to allow for duplexes, triplexes, quadplexes, and townhouses will promote market-rate rentals over home ownership. The new units are predicted to be mostly micro-rental units with unaffordable average market-rate rents of \$1,823/month. Rather than affordable housing, Portland will see speculative redevelopment accompanied by increased demolitions of the most-affordable existing housing and more displacements of the most-vulnerable residents. According to the City's analysis, this type of rezoning will result in the displacement of low-income residents with no path of return. This will disproportionately impact minorities. The adopted 2035 Comprehensive Plan already has a 20-year housing supply of all housing types without RIP, including detached single-family, duplexes, triplexes, quad-plexes, and townhouses. Objections to RIP include: • Elimination of Single-Family Neighborhoods • Promotion of rentals over home ownership • Increased demolitions of affordable housing • No parking requirements • No infrastructure requirements • No transportation planning • Environmental protections overridden • Significant loss of residential tree canopy • No protection for historic resources • No restrictions on vacation rentals • Decreased fire safety in multi-units • Creates unaffordable housing • Displaces minorities worse than redlining • Exceeds the State-mandated requirements of HB 2001 The predicted unintentional consequences of RIP are far too negative to jeopardize the livability of the City of Portland. Please vote against it. Please add this to the Record.

Testimony is presented without formatting.

Marla McDonald

#83188 | January 15, 2020

Testimony to **Portland City Council** on the **Residential Infill Project, Recommended Draft**

Residential Infill Project RIP is being promoted as a solution to the housing affordability crisis. However, the analysis commissioned by the City of Portland showed that rezoning all single-family lots to allow for duplexes, triplexes, quadraplexes, and townhouses will promote market-rate rentals over home ownership. The new units are predicted to be mostly micro-rental units with unaffordable average market-rate rents of \$1,823/month. Rather than affordable housing, Portland will see speculative redevelopment accompanied by increased demolitions of the most-affordable existing housing and more displacements of the most-vulnerable residents. According to the City's analysis, this type of rezoning will result in the displacement of low-income residents with no path of return. This will disproportionately impact minorities. The adopted 2035 Comprehensive Plan already has a 20-year housing supply of all housing types without RIP, including detached single-family, duplexes, triplexes, quad-plexes, and townhouses. Objections to RIP include: • Elimination of Single-Family Neighborhoods • Promotion of rentals over home ownership • Increased demolitions of affordable housing • No parking requirements • No infrastructure requirements • No transportation planning • Environmental protections overridden • Significant loss of residential tree canopy • No protection for historic resources • No restrictions on vacation rentals • Decreased fire safety in multi-units • Creates unaffordable housing • Displaces minorities worse than redlining • Exceeds the State-mandated requirements of HB 2001 The predicted unintentional consequences of RIP are far too negative to jeopardize the livability of the City of Portland. Please vote against it. Please add this to the Record.

Testimony is presented without formatting.

Claire Coleman-Evans

#83189 | January 15, 2020

Testimony to **Portland City Council** on the **Residential Infill Project, Recommended Draft**

RIP is being promoted as a solution to the housing affordability crisis. However, the analysis commissioned by the City of Portland showed that rezoning all single-family lots to allow for duplexes, triplexes, quadraplexes, and townhouses will promote market-rate rentals over home ownership. The new units are predicted to be mostly micro-rental units with unaffordable average market-rate rents of \$1,823/month. Rather than affordable housing, Portland will see speculative redevelopment accompanied by increased demolitions of the most-affordable existing housing and more displacements of the most-vulnerable residents. According to the City's analysis, this type of rezoning will result in the displacement of low-income residents with no path of return. This will disproportionately impact minorities. The adopted 2035 Comprehensive Plan already has a 20-year housing supply of all housing types without RIP, including detached single-family, duplexes, triplexes, quad-plexes, and townhouses. Objections to RIP include: • Elimination of Single-Family Neighborhoods • Promotion of rentals over home ownership • Increased demolitions of affordable housing • No parking requirements • No infrastructure requirements • No transportation planning • Environmental protections overridden • Significant loss of residential tree canopy • No protection for historic resources • No restrictions on vacation rentals • Decreased fire safety in multi-units • Creates unaffordable housing • Displaces minorities worse than redlining • Exceeds the State-mandated requirements of HB 2001 The predicted unintentional consequences of RIP are far too negative to jeopardize the livability of the City of Portland. Please vote against it.

Testimony is presented without formatting.



January 15, 2019

RE: Residential Infill Project

Mayor Wheeler and City Commissioners,

The Welcome Home Coalition represents some 65 organizations throughout the Portland tri-county area that uses its collective resources to advance policies that enable each of our neighbors to succeed in their housing outcomes. In recent years our coalition has helped secure nearly \$1 billion to build thousands of newly affordable homes throughout the Metro region. Despite this significant new revenue for affordable housing development, we know that much more needs to be done in order to ensure each of our neighbors has an affordable place to call home.

As you consider the broader Residential Infill Project (RIP), we would urge you to maximize this opportunity to ensure (1) RIP results in more deeply affordable housing being produced, and (2) that RIP does not result in further displacement of vulnerable communities.

In terms of deeper affordability, we are supportive of the Deeper Affordability Bonus that allows for increased unit production when the homes created are affordable in the 60 to 80 percent area median income range. This production is critical to the long-term viability of our community, and it would be a critically missed opportunity were it not included in the finalized version of RIP.

We are also appreciative of the attention the Bureau of Planning and Sustainability has paid to studying the issue of displacement prior to RIP being enacted, and are encouraged by the findings in the modeling done by staff. However, in that modeling, three neighborhoods are called out as areas that have a higher risk of displacement impacts: Brentwood-Darlington, Lents, and parts of Montavilla. We strongly urge the City to find ways to further partner with affordable housing developers and directly impacted communities in those neighborhoods to prevent such displacement. Adoption of the Deeper Affordability Bonus is one critical way in which affordable housing developers could help mitigate the risk of further displacement.

Thank you all for your commitments and efforts to make Portland an affordable place to call home for each of our neighbors. We know there is significant work ahead to achieve that vision, but know that together we can make that vision a reality.

Sincerely,

A handwritten signature in dark ink, reading "Tyler Mac Innis". The signature is fluid and cursive, with the first name "Tyler" and last name "Mac Innis" clearly distinguishable.

Tyler Mac Innis, coalition director

Tyler MacInnis

#83209 | January 15, 2020

Testimony to **Portland City Council** on the **Residential Infill Project, Recommended Draft**

Letter from Welcome Home Coalition attached.

Testimony is presented without formatting.

Kevin and Gail Davis-Powell

#83211 | January 15, 2020

Testimony to **Portland City Council** on the **Residential Infill Project, Recommended Draft**

We are writing to express our opposition to further pursuit of the portion of the Residential Infill Project proposal that would allow deviation from zoning restrictions previously applicable to R5 and R7 designations. According to the map published by the City, the proposed overlay allowing duplexes and triplexes would be applicable to our property and our entire neighborhood. It would adversely affect our quality of life. We purchased our home in 1985 at this specific location expressly for the reason that lots are relatively large and the zoning protected the feeling of openness and space between neighbors that many of us prefer. At least, we thought the zoning protected us. It is a neighborhood of single-family dwellings mostly inhabited by those who own the properties. We have worked diligently for 35 years to enhance the visual appeal of our home and property, for the benefit of ourselves and our neighbors. Allowing duplexes and triplexes would destroy the very things that brought us here in the first place. Smaller homes will likely be demolished to make way for new duplexes and triplexes. Larger lots will be filled with additional structures and trees will be removed to make room for this densification. The increased traffic, increased demand for street parking and overall increased density would be objectionable, as would the change of character that inevitably occurs when properties shift from owner occupied to renter occupied. We understand that many people if given the opportunity might like to move to Portland. Accommodating at least some of them is a reasonable objective, but not at the expense of those of us who have been here for decades. It is poor policy to injure the current, home owning, taxpaying residents for the benefit of those who might like to move here in the future. There is no obligation to take such action and no logical reason to diminish the livability of neighborhoods in order to pack in possible newcomers. We are strongly opposed to the portion of the Residential Infill Project described above and ask you to reject further consideration of it.

Testimony is presented without formatting.

Helen Ann Feeney

#83212 | January 15, 2020

Testimony to **Portland City Council** on the **Residential Infill Project, Recommended Draft**

RIP is being promoted as a solution to the housing affordability crisis. However, the analysis commissioned by the City of Portland showed that rezoning all single-family lots to allow for duplexes, triplexes, quadraplexes, and townhouses will promote market-rate rentals over home ownership. The new units are predicted to be mostly micro-rental units with unaffordable average market-rate rents of \$1,823/month. Rather than affordable housing, Portland will see speculative redevelopment accompanied by increased demolitions of the most-affordable existing housing and more displacements of the most-vulnerable residents. According to the City's analysis, this type of rezoning will result in the displacement of low-income residents with no path of return. This will disproportionately impact minorities. The adopted 2035 Comprehensive Plan already has a 20-year housing supply of all housing types without RIP, including detached single-family, duplexes, triplexes, quad-plexes, and townhouses. Objections to RIP include: • Elimination of Single-Family Neighborhoods • Promotion of rentals over home ownership • Increased demolitions of affordable housing • No parking requirements • No infrastructure requirements • No transportation planning • Environmental protections overridden • Significant loss of residential tree canopy • No protection for historic resources • No restrictions on vacation rentals • Decreased fire safety in multi-units • Creates unaffordable housing • Displaces minorities worse than redlining • Exceeds the State-mandated requirements of HB 2001 The predicted unintentional consequences of RIP are far too negative to jeopardize the livability of the City of Portland. Please vote against it. Please add this to the Record.

Testimony is presented without formatting.

Michelle Lee

#83213 | January 15, 2020

Testimony to **Portland City Council** on the **Residential Infill Project, Recommended Draft**

RIP is being promoted as a solution to the housing affordability crisis. However, the analysis commissioned by the City of Portland showed that rezoning all single-family lots to allow for duplexes, triplexes, quadraplexes, and townhouses will promote market-rate rentals over home ownership. The new units are predicted to be mostly micro-rental units with unaffordable average market-rate rents of \$1,823/month. Rather than affordable housing, Portland will see speculative redevelopment accompanied by increased demolitions of the most-affordable existing housing and more displacements of the most-vulnerable residents. According to the City's analysis, this type of rezoning will result in the displacement of low-income residents with no path of return. This will disproportionately impact minorities. The adopted 2035 Comprehensive Plan already has a 20-year housing supply of all housing types without RIP, including detached single-family, duplexes, triplexes, quad-plexes, and townhouses. Objections to RIP include: • Elimination of Single-Family Neighborhoods • Promotion of rentals over home ownership • Increased demolitions of affordable housing • No parking requirements • No infrastructure requirements • No transportation planning • Environmental protections overridden • Significant loss of residential tree canopy • No protection for historic resources • No restrictions on vacation rentals • Decreased fire safety in multi-units • Creates unaffordable housing • Displaces minorities worse than redlining • Exceeds the State-mandated requirements of HB 2001 The predicted unintentional consequences of RIP are far too negative to jeopardize the livability of the City of Portland. Please vote against it. Please add this to the Record.

Testimony is presented without formatting.

Nancy Thomas

#83214 | January 15, 2020

Testimony to **Portland City Council** on the **Residential Infill Project, Recommended Draft**

I am opposed to RIP. It will decrease the livability of Portland by: - Disrupting and eliminating single-family neighborhoods - Promoting rentals over home-ownership - Increased demolition of affordable housing - Displacement of people from their existing homes and neighborhoods - Increased congestion and parking challenges - Destruction of tree canopy Thanks for your consideration.

Testimony is presented without formatting.

Donald and Marlene Winn

#83215 | January 15, 2020

Testimony to **Portland City Council** on the **Residential Infill Project, Recommended Draft**

RIP is being promoted as a solution to the housing affordability crisis. However, the analysis commissioned by the City of Portland showed that rezoning all single-family lots to allow for duplexes, triplexes, quadraplexes, and townhouses will promote market-rate rentals over home ownership. The new units are predicted to be mostly micro-rental units with unaffordable average market-rate rents of \$1,823/month. Rather than affordable housing, Portland will see speculative redevelopment accompanied by increased demolitions of the most-affordable existing housing and more displacements of the most-vulnerable residents. According to the City's analysis, this type of rezoning will result in the displacement of low-income residents with no path of return. This will disproportionately impact minorities. The adopted 2035 Comprehensive Plan already has a 20-year housing supply of all housing types without RIP, including detached single-family, duplexes, triplexes, quad-plexes, and townhouses. Objections to RIP include: • Elimination of Single-Family Neighborhoods • Promotion of rentals over home ownership • Increased demolitions of affordable housing • No parking requirements • No infrastructure requirements • No transportation planning • Environmental protections overridden • Significant loss of residential tree canopy • No protection for historic resources • No restrictions on vacation rentals • Decreased fire safety in multi-units • Creates unaffordable housing • Displaces minorities worse than redlining • Exceeds the State-mandated requirements of HB 2001 The predicted unintentional consequences of RIP are far too negative to jeopardize the livability of the City of Portland. Please vote against it. Please add this to the Record.

Testimony is presented without formatting.

Teresa M McGrath

#83216 | January 15, 2020

Testimony to **Portland City Council** on the **Residential Infill Project, Recommended Draft**

we oppose rip, as the last few yrs and decades demonstrates portland doesn't care about its residents who live here and love their city...by demolishing a 300k house, and erecting a duplex that costs 7-800k each is not building affordable housing...we don't have a housing shortage, since 16,000 apts are empty, and many homes remain investments for those that don't rent them out...it's wrong ...rip up the rip, it's a bad idea...there are numerous examples we've sent to the city council that illustrates this reality the last few yrs.....pls listen to the people who want to save their city....thx

Testimony is presented without formatting.