

Patrick Ebbett

#133873 | May 25, 2020

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

I just want to say that I support the fourplex plan and the position of Portland Neighbors Welcome. I vigorously oppose Amendment 7.

Testimony is presented without formatting.

Shannon Wilson

#143870 | May 26, 2020

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

I support the position of Portland: Neighbors welcome and amendments to the city's plan to add more housing choices, prioritize regulated-affordable homes, increase age-friendly and physically accessible housing, and reduce displacement of low-income renters citywide.

Testimony is presented without formatting.

Nick Buri

#143871 | May 26, 2020

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

My name's Nick Buri & I'm an organizer with Sunrise PDX. We already know that densifying our housing stock is one of many essential tools for fighting the climate crisis: from reducing energy use per occupant to increasing the efficiency of public transportation, the many ways in which densification reduces greenhouse emissions are well-documented. That's why Sunrise PDX is here to support the Residential Infill Project and the amendments recommended by Portland: Neighbors Welcome. RIP is a crucial foundational step in undoing some of the harms of Portland's racist housing codes, adding much needed density to our metro area, increasing affordability to address our housing crisis, and combating the climate catastrophe. To that end, we need to pass amendments one through four, and we need to ensure amendments five, seven, and eight through seventeen remain out of the final project. Most importantly, though, we need to make sure amendment 6, the Deeper Affordability Bonus, gets passed. We need to ensure that the solutions we implement to fight the climate *and* housing crises are equitable and don't leave out marginalized communities – amendment 6 brings us closer to that goal by ensuring that the dense housing built as a result of this project isn't just a luxury-housing giveaway to developers, but is available to folks in the middle unaffordability zone. All that said, passing this project even in the best possible condition isn't enough. We need to use this momentum to surge forward on anti-displacement policies, building more deeply affordable homes, allowing mixed-income buildings, and adopting strong funding and zoning reforms to fight homelessness. RIP is a great step, but it needs to be the first of many. Thanks for your time.

Testimony is presented without formatting.

Joseph Curran

#143881 | May 26, 2020

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

Hello City Council Members, my name is Joe Curran, and I am a member of Sunrise PDX. Thank you for the opportunity to speak today. At Sunrise, we appreciate the ways in which residential infill reduces the impacts we have on the climate. Compared to single family housing, denser housing consumes less energy per person. And as opposed to sprawling neighborhoods, denser ones increase the efficacy of public transportation, lessening the need for more and more cars on the road and inducing more people to walk, bike, or take the bus and train. For these reasons, I would like to thank the Council for their support on this measure. But at Sunrise we do not just care about the climate: we are a movement for climate justice. And climate justice does not look like denser, more environmentally friendly housing that is inaccessible to all but the rich. Climate justice does not look like more and more Portlanders displaced every month. Which is why we strongly oppose Amendments 7 and 8-17, and enthusiastically support the adoption of Amendment 6, in solidarity with our friends at Portland: Neighbors Welcome. While recognizing the significant need for a comprehensive anti-displacement strategy and more money for affordable and supportive housing, Amendment 6, by reducing barriers to building affordable homes, is a great opportunity for you, the City Council, to make a solid stride in the direction we need to go. So let's take this step, and then walk further. Thank you, Joe

Testimony is presented without formatting.

Lisa Cox

#143883 | May 26, 2020

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

Hello! I am profusely opposed to RIP. I do not believe it will benefit the vulnerable in our neighborhoods. What I see is affordable housing torn down to be replaced by unaffordable housing. Gentrification has displaced many people. People that can't afford to live here now. Portland should be a place everyone can afford a home in. Sadly, it no longer is and I believe RIP, as is, will not help. RIP will benefit developers. It's more money for the city leaders who can't seem to solve our city's issues. Thank you for your time.

Testimony is presented without formatting.

From: [Council Clerk – Testimony](#)
To: [Commissioner Hardesty](#); [Eudaly, Chloe](#); [Fritz, Amanda](#); [Wheeler, Ted](#)
Cc: [BPS Residential Infill](#); [King, Lauren](#); [Rees, Linly](#); [Aiten, Herico](#); [Bradley, Derek](#); [Carrillo, Yesenia](#); [Eale, Ocean](#); [Pierce, Meeseon Kwon](#); [Washington, Mustafa](#); [Williams, Tia](#)
Subject: Testimony for RIP: FW: No to RIP
Date: Tuesday, June 2, 2020 2:15:31 PM

From: Amy Wilson <nowaste@comcast.net>
Sent: Tuesday, June 2, 2020 2:00 PM
To: Council Clerk – Testimony <CCTestimony@portlandoregon.gov>
Subject: No to RIP

Dear Commissioners,

All signs point to this already being a done deal, but in the event there might still be an open mind, I oppose the RIP in its current format for the following reasons:

There are some things that are great about RIP, like reducing the size of McMansions, and allowing for more ADUs, but the majority is a **quantity over quality** approach where the only thing that seems to matter is counting new units. There doesn't seem to be any real concern for what the experience living in or around these units is like.

As an example, the **Inclusionary Housing** policy had great intentions, but developers were able to exploit loopholes. The City is aware of its failures yet has taken no action to correct them.

It is very likely RIP will follow suit, where the City will take no action when developers use the policy to increase their profits and contribute to the glut of luxury, unaffordable housing stock that does not address the intentions to provide affordable housing. Worse, the City has not taken any meaningful action to prevent new units from being turned into **short-term rentals**, as they are in my inner NE neighborhood.

WHO WINS?

Developers - who will now have even fewer restrictions to profiting from replacing affordable smaller homes with unaffordable development in desirable close-in neighborhoods.

Largely white, middle class, young transplants - as they displace the older, marginalized families without adequate resources to remain in their old neighborhoods.

Politicians - who will cite the numbers of new units as evidence of action but not understand what the lived experience is for people in neighborhoods where developers will concentrate their efforts.

WHO LOSES?

Established residents, especially POC - who will find this policy will only exacerbate gentrification in historical minority neighborhoods without extra protection from displacement.

Young homebuyers – or anyone trying to buy an affordable house who will find each new home, no matter how many to a lot, will be more expensive than the original that was bulldozed. Developers will continue to outbid families for small affordable homes.

Renters – who will continue to be evicted when developers approach owners with lucrative deals.

As the **four RIP commission members** who voted no insisted, RIP should not be approved until there are mandated safeguards that protect long-term community members from the displacement and gentrification that ruins community. Please vote no and consider a better plan that includes safeguards to prevent unintended consequences.

Sincerely,
Amy Wilson, Chair
King Neighborhood Association

Amy Wilson

#144062 | May 26, 2020

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

All signs point to this already being a done deal, but in the event there might still be an open mind, I oppose the RIP in its current format for the following reasons: There are some things that are great about RIP, like reducing the size of McMansions, and allowing for more ADUs, but the majority is a quantity over quality approach where the only thing that seems to matter is counting new units. There doesn't seem to be any real concern for what the experience living in or around these units is like. As an example, the Inclusionary Housing policy had great intentions, but developers were able to exploit loopholes. The City is aware of its failures yet has taken no action to correct them. It is very likely RIP will follow suit, where the City will take no action when developers use the policy to increase their profits and contribute to the glut of luxury, unaffordable housing stock that does not address the intentions to provide affordable housing. Worse, the City has not taken any meaningful action to prevent new units from being turned into short-term rentals, as they are in my inner NE neighborhood. WHO WINS? Developers - who will now have even fewer restrictions to profiting from replacing affordable smaller homes with unaffordable development in desirable close-in neighborhoods. Largely white, middle class, young transplants - as they displace the older, marginalized families without adequate resources to remain in their old neighborhoods. Politicians - who will cite the numbers of new units as evidence of action but not understand what the lived experience is for people in neighborhoods where developers will concentrate their efforts. WHO LOSES? Established residents, especially POC - who will find this policy will only exacerbate gentrification in historical minority neighborhoods without extra protection from displacement. Young homebuyers - or anyone trying to buy an affordable house who will find each new home, no matter how many to a lot, will be more expensive than the original that was bulldozed. Developers will continue to outbid families for small affordable homes. Renters - who will continue to be evicted when developers approach owners with lucrative deals. As the four RIP commission members who voted no insisted, RIP should not be approved until there are mandated safeguards that protect long-term community members from the displacement and gentrification that ruins community. Please vote no and consider a better plan that includes safeguards to prevent unintended consequences.

Testimony is presented without formatting.

Keith Comess

#143898 | May 27, 2020

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

This statement is in opposition to the Residential Infill Proposal (RIP). The RIP is predicated on the assumption that there will be a large influx of residents to the City. That projection was based on the economy as it was before the COVID-19 pandemic. It's no longer valid. As is well known, unemployment levels are now ~20% and the economy has suffered correspondingly. Projections for "re-opening" and economic recovery vary, but the consensus of economic experts (e.g.,

<https://fivethirtyeight.com/features/dont-expect-a-quick-recovery-our-survey-of-economists-says-it-will-likely-take-years> is for a protracted downturn. In short, the foundational assumption of RIP (need for many more homes based on an economy that no longer exists) has been nullified. In this case, the consensus of professional economists can be validated by common sense and empiric observations made by the general public based on their own circumstances, combined with those of family, friends, co-workers, etc. Speculation aside, prospects for a vigorous recovery - one that will induce job seekers to the Portland area - are slim for the next few years. Should Portland though be "pro-active" and engage in "infill" building now, assuming that this will provide for the future? Optimally yes but practically that can't be accomplished. What will induce builders, developers, lenders, and others to build with no expectation of return or profit? To summarize, RIP may already be functionally moribund. Why not use the interval to plan a more robust, generally acceptable urban development plan, one perhaps based on extending and expanding public transportation? Alternatively (or as a complement), why not devote public funds to sustaining the existing economy and supporting those of us unfortunate enough to be in economic peril and are therefore at risk of eviction, loss of our homes and means of support?

Testimony is presented without formatting.

Frances DeRook

#143901 | May 27, 2020

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

I am testifying in opposition to the Residential Infill Proposal (RIP). The RIP assumes an ongoing an expanding shortage of homes in the Portland area because of an expanding economy. The corona virus pandemic has short-circuited that assumption. Can the City afford to indulge in speculative building (that will likely need extensive public subsidies) when current residents are in danger of eviction and loss of existing shelter? I think not. Time and effort should be devoted to dealing with our current problems, rather than indulge in a grand plan that assumes a near-term rosy future. Why squander more time, effort and money on a speculative outcome? The RIP is dead and it should be buried.

Testimony is presented without formatting.

Saskia Comess

#143903 | May 27, 2020

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

I am testifying in opposition to the Residential Infill Proposal (RIP). Initially, there was some justifiable basis for the RIP: a vibrant economy and an influx of new residents who would profit from it. Because of the corona virus pandemic, the economy is in severe recession. As there is presently no vaccine or readily available treatment, we can't assume a quick recovery will occur. So, why use limited metropolitan resources to support a future that likely won't appear for at least a few years when time, money and planning should be immediately directed to dealing with our current levels of unemployment, evictions and mortgage default? In other words, the RIP can no longer be justified in terms of current needs.

Testimony is presented without formatting.

Diane Luck

#143933 | May 27, 2020

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

I am strongly opposed to the RIP. If implemented, it will irreversibly ruin the character and integrity of neighborhoods in Portland. We do not have the infrastructure to support such density nor should we destroy neighborhoods by allowing developers to outbid the average house buyer, put up multiple units on a lot, and make a profit with little concern for the impact on the neighbors. Portland will no longer be a desirable place to live when neighborhoods that were once charming and functional are ruined by greed of a few. Please, do not allow such infill to destroy our beautiful city.

Testimony is presented without formatting.

Let voters decide infill project

With opposition growing for the hope-

lessly convoluted Residential Infill Proj-

ect and developers pushing for a so-called

deeper affordability bonus, the Portland City

Council should let voters decide the destiny

and density of Portland neighborhoods. The

project was pushed by former Mayor Charlie

Hales, who is a former builders' lobbyist, and

trumpeted by developers as a way to create

"affordable" housing along transportation

corridors. The concept has been perverted

into something completely different: Picture

that great old bungalow next door bulldozed

and a blockhouse six-plex plopped down in

its place.

Face it, developers do this and then

move on. Experts have testified that the

infill project will have little or no effect on

affordability. While we still have a democ-

racy, let's all urge the City Council to give

Portlanders a vote on this issue in November

2020. If the council won't do this, Portland

voters need to ask why.

Frank DiMarco, Portland

teresa mcgrath

#143938 | May 28, 2020

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

OPPOSE RIP....the oregonian's letter to the editor echos our view...rip the rip...density is so old fashioned....rip the rip, it's not a vision, but wrong for portland....throw it out.....

Testimony is presented without formatting.

Anastasia Pyz

#143946 | May 28, 2020

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

Hello. My name is Anastasia and I am a youth climate activist with Sunrise PDX and a resident of the Sellwood neighborhood. As it is no news by now, Portland is in the middle of an affordable housing and houslessness crisis. Part of this reason is due to outdated and arbitrary laws that have been dictating how our cities' developers are allowed to construct or remodel single family homes that could otherwise provide residence for far greater people. In the year 2020, hearing that we still enforce coding such as limiting duplexes unless they are on a corner lot with one door facing in each direction OR worse yet, making an otherwise sound home illegal due to a lack of parking space, is asinine. Rules like these must absolutely be rewritten to accommodate the modern times we live in which call for denser housing, more public transit solutions, and the dissolving of the notion that every American must live in a massive home as a single family with a necessity to drive cars. An age of capitalism and a mass push for the use of the automobile have got us into this pigeon hole that is grossly mismanaging liveable square footage and we must usher in every creative and green solution at our disposal to fix the mess created in the past. This solution begins with the Residential infill project and its proposed amendments. By passing the Residential Infill Project, a greater variety of developers will be able to work on housing and they'll be able to create smaller units that will make housing more affordable for teachers, first responders, and other hard working low income and middle class families. However, please take into consideration some specific amendments that would be beneficial or detrimental to this proposal. Please support amendments 1-4 which will create more housing at lower prices in many neighborhoods to welcome people to Portland. Amendment 5 should not be supported as it would limit the development of three or more units on lots that lack frontage on an improved street with a curb or an otherwise approved alternate street standard. This essentially bans 4,5 and 6 plexes on curbless streets. Though this amendment doesn't stop new development, it does prevent the building of denser units which the city desperately needs. This amendment also lacks incentive to build sidewalks, just shifting the onus from developer to public taxpayers. I stand firm with our allies who also oppose this amendment: NAYA, VERDE, Living Cully, Oregon Walks, and Cully Neighborhood Association. I strongly support amendment 6 which enables non-profit housing providers to build truly affordable dense units on land they are ready to develop but aren't currently able to. Strong support is needed for this because this amendment addresses disparities in "the middle unaffordability zone" (being not low income enough for section 8 vouchers yet putting market rate housing out of reach for most middle income buyers). Continuing on, please oppose amendment 7, which would not lead to reusing existing homes, but to more

expensive homes. Opponents of the residential infill project refuse to have change come to their historic neighborhoods and have pushed to keep a ban on 3 and 4 plexes and deeper affordable 5 / 6 plexes on sites formerly occupied by "Historic Resources." This is a BAD policy that would allow richer neighborhoods to block new housing projects and would NOT incentivize internal conversions of existing homes (historic or otherwise). Portland McMansions could be much more efficient if properly remodeled to accommodate more families. But what's desperately needed is the allowed building of multiplexes. And to quell the uproar that new development will "destroy the look of Portland", many of the coolest homes I see around the city are multiplexes and still maintain character and charm of the city. It's foolish to hang on to old laws that perpetuate income inequality and do nothing to aide the housing crisis for the sake of those who want to keep everything untouched, despite this crisis. Finally, please remain steadfast in opposition to amendments 8 - 17. These would delay the adoption of this critically time-sensitive project, create unworkable standards that would block new housing, maintain the ban on 3 and 4 plexes throughout the city, allow "snout-house" garages that eat up precious space on narrow lots, and it would require countless and needless setback standards for new homes. The people of this city are in dire need of housing. The developers are salivating at the prospect of more building incentives. The environment is under daily and mounting strain of its resources and we must find a way to accommodate the humans in an intelligent and efficient way - not by protecting the vain facade of a historic home that shelters only one family. This is nonsense, so please do the right thing now and pass forward this monumental proposal to fix the mess of the past and pave the way for Portland to be a sustainability leader once again. Housing justice is climate justice. Thank you

Testimony is presented without formatting.

Jynx Houston

#143951 | May 28, 2020

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

It is indisputable by now that RIP will have no effect whatsoever on affordability. If you vote to pass it you are in bright letters showing yourselves to be complete lapdogs of the real estate & developer class.

Testimony is presented without formatting.

With each iteration of the Bureau of Planning and Sustainability's Residential Infill Project (RIP) proposals, the potential impacts on Portland neighborhoods have increased.

Amendment #6 would allow a building with up to six units on all R2.5, R5 and R7 residential single family zoned lots if at least half of the units (so three units if the building is a six plex) are affordable as rentals to those earnings not more than 60% of Mean Family Income (MFI).

The amendment would allow additional floor area ratio (FAR) for these 'multi-dwelling structures'. Under the proposed amendment, the following sizes would be allowed for these buildings:

- 3200 square feet in the R2.5 Zone
- 4500 square feet in the R5 Zone
- 6000 square feet in the R7 Zone

Amendment #6 would also grant an additional height bonus of 5 feet in the R5 and R7 zones which means buildings could be 35 feet tall.

Data from the City of Portland shows the median Portland house is 1500 square feet and 15 feet tall (to the midpoint of the roof pitch). The multi-dwelling structures allowed under Amendment #6 would be grossly out of scale in almost all Portland neighborhoods.

One of the goals of the original Residential Infill Project was to modify building codes so the scale of new construction would fit in better with existing homes in a neighborhood. In the five years since this project began, each iteration of RIP has become more removed from achieving this goal. Amendment #6 takes us ever further from the goal of changing city code to create compatible infill.

Furthermore there is nothing in RIP or in Amendment #6 that would require or even encourage the higher density units to be located near frequent transit.

The 2035 Comprehensive Plan directs us to focus density around centers and transportation hubs. Instead of well-planned increases in density directed by the Comprehensive Plan, RIP ignores the Comp Plan by allowing random density throughout the residential neighborhoods, without consideration of infrastructure needs, including parking. A better plan would be for the City to focus the levels of Middle Housing around town centers and transportation corridors with frequent (every 15 minutes), reliable and safe public transit.

Amendment #6 is likely to result in more demolitions; BPS has not analyzed the demolition risks associated with this amendment.

Finally, while BPS acknowledges there is a displacement risk with RIP, they have no proposal to mitigate this displacement. The City should wait to pass RIP until it has a serious anti-displacement plan in place. This plan would need to have long term funding and a tracking system to determine if is effective.

Jacquie Walton

#143954 | May 28, 2020

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

Please vote no on Amendment #6. It will likely result in more demolitions and displacement of current residents. The City should wait until a serious anti-displacement plan is in place. See the attached PDF doc for more information.

Testimony is presented without formatting.

Paul Leitman

#143973 | May 28, 2020

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

I support the approval of the amendment to the Residential Infill Project. These changes will ensure consistency between previous policies already adopted by the Council, comply with state-mandated zoning laws, simplify the process for lot line adjustments, provide additional incentives for affordable infill development, and encourage adaptive reuse of existing historic resources. Please adopts these amendments. Thank you.

Testimony is presented without formatting.

From: [Council Clerk – Testimony](#)
To: [Commissioner Hardesty](#); [Eudaly, Chloe](#); [Fritz, Amanda](#); [Wheeler, Ted](#)
Cc: [BPS Residential Infill](#); [King, Lauren](#); [Rees, Linly](#)
Subject: Testimony for RIP: FW: Residential Infill Project Testimony for the June 3, 2020 Portland City Council Public Hearing
Date: Thursday, May 28, 2020 1:44:15 PM

From: Terry Parker <parkert2012@gmail.com>
Sent: Thursday, May 28, 2020 12:00 PM
To: Council Clerk – Testimony <CCTestimony@portlandoregon.gov>; Wheeler, Mayor <MayorWheeler@portlandoregon.gov>; Commissioner Fritz <amanda@portlandoregon.gov>; Commissioner Hardesty <joann@portlandoregon.gov>; Commissioner Eudaly <chloe@portlandoregon.gov>
Cc: <board@lists.rcpna.org> <board@lists.rcpna.org>; landuse <landuse@lists.rcpna.org>; Stoll, Alison <alisons@cnncoalition.org>
Subject: Residential Infill Project Testimony for the June 3, 2020 Portland City Council Public Hearing

From the time the Residential Infill Project was first conceived by way of a stakeholder committee that was a stacked with developer interests, it is my belief the interests of homeowners who have long term investments in the community have been under represented and over shadowed by for-profit developer interests and build baby build housing advocates that want more density everywhere. The negative impacts of adding more density in single dwelling zoned neighborhoods must not be ignored.

Due to City Hall being closed to the public and the hearing being held electronically, many people including myself who do not have internet access at home are being left out of what should be a totally open public process. Since RIP is such a contentious issue, any City Council decisions that would permanently change city-wide zoning codes and regulations including the types of the development that can take place residential neighborhoods should be delayed until such time City Hall reopens and face to face public hearings can be held. I am sending you my testimony by sitting in my SUV utilizing my laptop on limited time battery power to connect with the wifi outside of a closed Multnomah County Library.

In addition to Portland's treasured parks and public golf courses, one of the characteristics that makes Portland a beautiful, livable and tourist friendly city is the existing single-family home neighborhoods. The Residential Infill Project (RIP) experiment is closely related city-wide to what happened in Albina in the 1960s. The destruction of in-city/established single family home neighborhoods could conceivably result in the gentrification and displacement of middle and working class families fleeing to the suburbs. Moreover, RIP was never designed to provide affordable housing. The last minute amendment to add six units per individual lot to the density mix is likely to become an inadequate and failed attempt to create some sense of affordability.

Increasing density in single-dwelling zoned neighborhoods with RIP as the blueprint will not only target demolishing the most affordable homes, but also historic and architecturally significant homes and structures. The greenest buildings are the ones already built. Adding density in single-dwelling zoned neighborhoods will also reduce and eliminate green yards that produce oxygen, and remove mature trees that act as carbon offsets thereby destroying the neighborhood environment and ambiance. A turf area 50' x 50' can produce enough oxygen to meet the daily needs of a family of

four. An average golf course can produce enough oxygen to support 4,000 to 7,000 people. RIP will allow heat island type development to take place directly within single dwelling zoned neighborhoods.

As a kid who was born in Portland and grew up living in an approximate 1500 square foot modest single family home on an approximate 5000 square foot lot, my neighbor and I had a six hole golf course crisscrossing our adjoining front yards where we used plastic practice golf balls and tuna cans for the cups. In my back yard, there was just enough room to set up and play croquet corner to corner. Along with my sister and her friends, we had monopoly tournaments and played other board games under the trees. In the garden I played with my ten cent Tootsietoy cars on paved roads of dried mud formed with a garden trowel that washed away every time it rained. My neighbor and I even built a ramshackle clubhouse in his yard, using what ever building materials we could find.

If the Coronavirus has taught us anything, it should have taught us that a virus spreads faster in areas that have high density housing and housing with little or no adjacent outdoor living space. Be it an adult barbeque or a kids activity, the proposals and amendment to permit the building of three to six units on all R2.5, R5 and R7 residential single family zoned lots does not allow for enough adjacent outdoor space for such activities and still have social distancing should another pandemic occur. Therefore, the primary purpose for allowing this larger footprint and out of scale dense development in R2.5, R5 and R7 single dwelling zoned neighborhoods coupled outdoor amenities is for the most part non-existent. This is not the desired outcome.

Likewise, the Coronavirus has also taught us the value of drive through pickup windows and that diving in one's own car is social distancing transport. If the expectation is that people will transition from internal combustion powered vehicles to electric vehicles, access to electricity to connect over night charging devices is a necessity. The current range of an electric car is approximately 200 miles, even less if the heater or air conditioner is being used. A full quick charge at a charging station takes away about one-half of an hour of travel time. 89% of households in the Portland-Metro area have one or more cars. The city's own studies suggest that 72% of households in new large multi-unit buildings without parking have one or more cars. Adequate off-street parking is needed which equates to no less than three parking spaces for every four units that also includes access to electricity for plugging in charging devices so electric vehicles can be charged over night. There is a demand for this off-street parking and it needs to be required with all new residential development.

Furthermore, it should be noted that without adequate off-street parking, residential streets will likely become unacceptable full-time car storage lots. Curb cuts for driveways in residential neighborhoods allow access to homes for service and delivery vehicles, create a space for garbage and recycle pickup, and allow direct access to TriMet's Lift or other on-call vehicles for hire that mobility impaired utilize.

The 2035 Portland Comprehensive Plan serves as the starting point from which changes to the Municipal Code are made. Without amending the plan, RIP fails in this matter and therefore has been originated by a flawed process.

RIP and the amendments fail to provide zoning implementation tools that would be equal to or more supportive of the Comprehensive Plan as a whole. No such evaluation against the Plan's relevant goals and policies was made or available for public review. RIP and the amendments fail to comply with the Buildable Lands Inventory and Growth Allocation GIS model which serves as a basis for utility and transportation assumptions.

The proposed Table Summary of Development Standards fails to provide a clear land use designation in single-dwelling zones. The Comprehensive Plan designates specific areas to

apply appropriate zoning for middle housing. Instead, RIP allows a city-wide implementation of densities in single-dwelling zones that are normally found in multi-family dwelling zones.

No public facility adequacy study has been published to identify the impacts on the existing and future availability of urban public facilities and services; and no system capacity analyses or foundation of public investment (such as for water, sewer, transportation and roadway needs) has been conducted. Additionally, no adequacy study has been published to identify the impacts of not requiring adequate off-street parking, the positive benefits of curb cuts, the future residential needs for charging electric vehicles overnight and the impacts of removing green yards and cutting down large trees that provide carbon offsets.

Higher densities including triplexes and quadplexes etc. should be restricted to town centers, major corridors and close-in to transit centers, identified as the places to locate multi-family housing in Portland's Comprehensive Plan. Most Portland neighborhoods have one or more of these types of locations likely meeting the directives in HB2001. Pilot projects to identify affordability and impacts should also be allowed to take place in neighborhoods where a majority of residents want more density. New structures in single dwelling zoned neighborhoods should not be built in isolation and match the scale and setbacks of the surrounding structures within those diverse neighborhoods

Finally, investing in home ownership is a form of creating wealth, and likely the biggest lifetime investment a family makes. On the other hand, RIP appears to propose replacing affordable home ownership availability with more corporate owned rental properties. By increasing the allowable density, RIP increases the cost of the land thereby increasing the costs of all housing along with setting out the "for sale" sign offering up single family home neighborhoods to for-profit developers for the highest bid. It opens the door to the kind of neighborhood destruction that is taking place in Vancouver, B.C. where one in every four single family homes being sold is demolished.

If RIP is to be adopted, either the entire one size fits all Residential Infill Project and any amendments must be sent back to the PSC to comply with Portland's Comprehensive Plan, or the Comprehensive Plan needs to be updated with a rigorous face to face public process. Since there is already enough land zoned to meet Portland's housing needs, the least contentious option is to follow the already approved Comprehensive Plan with RIP and the proposed amendments declared as null and void.

Respectfully submitted,

Terry Parker
Northeast Portland

Terry Parker

#144053 | May 28, 2020

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

From the time the Residential Infill Project was first conceived by way of a stakeholder committee that was a stacked with developer interests, it is my belief the interests of homeowners who have long term investments in the community have been under represented and over shadowed by for-profit developer interests and build baby build housing advocates that want more density everywhere. The negative impacts of adding more density in single dwelling zoned neighborhoods must not be ignored. Due to City Hall being closed to the public and the hearing being held electronically, many people including myself who do not have internet access at home are being left out of what should be a totally open public process. Since RIP is such a contentious issue, any City Council decisions that would permanently change city-wide zoning codes and regulations including the types of the development that can take place residential neighborhoods should be delayed until such time City Hall reopens and face to face public hearings can be held. I am sending you my testimony by sitting in my SUV utilizing my laptop on limited time battery power to connect with the wifi outside of a closed Multnomah County Library. In addition to Portland's treasured parks and public golf courses, one of the characteristics that makes Portland a beautiful, livable and tourist friendly city is the existing single-family home neighborhoods. The Residential Infill Project (RIP) experiment is closely related city-wide to what happened in Albina in the 1960s. The destruction of in-city/established single family home neighborhoods could conceivably result in the gentrification and displacement of middle and working class families fleeing to the suburbs. Moreover, RIP was never designed to provide affordable housing. The last minute amendment to add six units per individual lot to the density mix is likely to become an inadequate and failed attempt to create some sense of affordability. Increasing density in single-dwelling zoned neighborhoods with RIP as the blueprint will not only target demolishing the most affordable homes, but also historic and architecturally significant homes and structures. The greenest buildings are the ones already built. Adding density in single-dwelling zoned neighborhoods will also reduce and eliminate green yards that produce oxygen, and remove mature trees that act as carbon offsets thereby destroying the neighborhood environment and ambiance. A turf area 50' x 50' can produce enough oxygen to meet the daily needs of a family of four. An average golf course can produce enough oxygen to support 4,000 to 7,000 people. RIP will allow heat island type development to take place directly within single dwelling zoned neighborhoods. As a kid who was born in Portland and grew up living in an approximate 1500 square foot modest single family home on an approximate 5000 square foot lot, my neighbor and I had a six hole golf course crisscrossing our adjoining front yards where we used

plastic practice golf balls and tuna cans for the cups. In my back yard, there was just enough room to set up and play croquet corner to corner. Along with my sister and her friends, we had monopoly tournaments and played other board games under the trees. In the garden I played with my ten cent Tootsie toy cars on paved roads of dried mud formed with a garden trowel that washed away every time it rained. My neighbor and I even built a ramshackle clubhouse in his yard, using what ever building materials we could find. If the Coronavirus has taught us anything, it should have taught us that a virus spreads faster in areas that have high density housing and housing with little or no adjacent outdoor living space. Be it an adult barbeque or a kids activity, the proposals and amendment to permit the building of three to six units on all R2.5, R5 and R7 residential single family zoned lots does not allow for enough adjacent outdoor space for such activities and still have social distancing should another pandemic occur. Therefore, the primary purpose for allowing this larger footprint and out of scale dense development in R2.5, R5 and R7 single dwelling zoned neighborhoods coupled outdoor amenities is for the most part non-existent. This is not the desired outcome. Likewise, the Coronavirus has also taught us the value of drive through pickup windows and that driving in one's own car is social distancing transport. If the expectation is that people will transition from internal combustion powered vehicles to electric vehicles, access to electricity to connect over night charging devices is a necessity. The current range of an electric car is approximately 200 miles, even less if the heater or air conditioner is being used. A full quick charge at a charging station takes away about one-half of an hour of travel time. 89% of households in the Portland-Metro area have one or more cars. The city's own studies suggest that 72% of households in new large multi-unit buildings without parking have one or more cars. Adequate off-street parking is needed which equates to no less than three parking spaces for every four units that also includes access to electricity for plugging in charging devices so electric vehicles can be charged over night. There is a demand for this off-street parking and it needs to be required with all new residential development. Furthermore, it should be noted that without adequate off-street parking, residential streets will likely become unacceptable full-time car storage lots. Curb cuts for driveways in residential neighborhoods allow access to homes for service and delivery vehicles, create a space for garbage and recycle pickup, and allow direct access to TriMet's Lift or other oncall vehicles for hire that mobility impaired utilize. The 2035 Portland Comprehensive Plan serves as the starting point from which changes to the Municipal Code are made. Without amending the plan, RIP fails in this matter and therefore has been originated by a flawed process. RIP and the amendments fail to provide zoning implementation tools that would be equal to or more supportive of the Comprehensive Plan as a whole. No such evaluation against the Plan's relevant goals and policies was made or available for public review. RIP and the amendments fail to comply with the Buildable Lands Inventory and Growth Allocation GIS model which serves as a basis for utility and transportation assumptions. The proposed Table Summary of Development Standards fails to provide a clear land use designation in single-dwelling zones. The Comprehensive Plan designates specific areas to apply appropriate zoning for middle housing. Instead, RIP allows a city-wide implementation of densities in single-dwelling zones that are normally found in multi-family dwelling zones. No public facility adequacy study has been published to identify the impacts on the

existing and future availability of urban public facilities and services; and no system capacity analyses or foundation of public investment (such as for water, sewer, transportation and roadway needs) has been conducted. Additionally, no adequacy study has been published to identify the impacts of not requiring adequate off-street parking, the positive benefits of curb cuts, the future residential needs for charging electric vehicles overnight and the impacts of removing green yards and cutting down large trees that provide carbon offsets. Higher densities including triplexes and quadplexes etc. should be restricted to town centers, major corridors and close-in to transit centers, identified as the places to locate multi-family housing in Portland's Comprehensive Plan. Most Portland neighborhoods have one or more of these types of locations likely meeting the directives in HB2001. Pilot projects to identify affordability and impacts should also be allowed to take place in neighborhoods where a majority of residents want more density. New structures in single dwelling zoned neighborhoods should not be built in isolation and match the scale and setbacks of the surrounding structures within those diverse neighborhoods. Finally, investing in home ownership is a form of creating wealth, and likely the biggest lifetime investment a family makes. On the other hand, RIP appears to propose replacing affordable home ownership availability with more corporate owned rental properties. By increasing the allowable density, RIP increases the cost of the land thereby increasing the costs of all housing along with setting out the "for sale" sign offering up single family home neighborhoods to for-profit developers for the highest bid. It opens the door to the kind of neighborhood destruction that is taking place in Vancouver, B.C. where one in every four single family homes being sold is demolished. If RIP is to be adopted, either the entire one size fits all Residential Infill Project and any amendments must be sent back to the PSC to comply with Portland's Comprehensive Plan, or the Comprehensive Plan needs to be updated with a rigorous face to face public process. Since there is already enough land zoned to meet Portland's housing needs, the least contentious option is to follow the already approved Comprehensive Plan with RIP and the proposed amendments declared as null and void.

Testimony is presented without formatting.

Greg Raisman

#143974 | May 29, 2020

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

I'm writing just to say that I support RIP for about a million reasons and that I also support the amendments proposed by Portland Neighbors Welcome.

Testimony is presented without formatting.

Philip Quarterman

#143976 | May 29, 2020

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

To Portland City Council: I wish to submit this testimony on the Residential Infill Project, as a follow up to testimony I submitted 3-4 years ago both written and in person. I have owned and resided at my property since 2002. I have a small single family dwelling with a large garden space on a 10,000 sf lot. The current and proposed plan designation and zoning is R7. Over this period the burden of proper maintenance of the property has grown larger to the point where I have considered my options (I am now 72 and retired) and I wish to partition my lot and sell a portion of it for development of a single family home. I hope to continue living on the remaining property for the foreseeable future. I looked at the other options under the existing and proposed zoning code: multi-family housing and ADU. Neither of these options is practicable for me, not least because at my stage in life, taking out a large construction loan is not in the cards. My house is situated in such a way that with standard setbacks, a lot could be created of over 4,000 sf to accommodate a modest sized house with access off SW Marigold Street. This would leave me with a much more manageable garden space. I consulted with a planner at the BPS and was informed that partitioning my property under R7 provisions is not possible. However, he told me, had my lot been zoned R5, I would have met the density test of one dwelling per 5,000 sf, and could have partitioned to create a lot as small as 3,000 sf. This is apparently because the R7 zone was written specifically to limit increased density and infill opportunities by simple partitioning of larger lots. This struck me as ironic given the City's initiative to increase infill and allow for more affordable housing. Especially so, because as you can see from the attached zoning map, the area immediately across the street is zoned R5! This led me to question why the two zones have different provisions for partitioning given the City's policy direction. Further, I question whether the two zones are rationally applied to my neighborhood, given that it is relatively homogenous in character and density. Indeed, the same question might be asked about large parts of the SW Portland area, including around Multnomah Village. Whatever the rationale for the R5 and R7 plan designations and zones when the Comprehensive Plan was originally adopted, with neighborhood association input, it seems to me that rationale has been superseded by the new policy direction. I support the City's policy to encourage infill and provide for more affordability and housing choice. The City has taken considerable heat from some neighborhoods about amendments to allow more multi-family housing. However, I believe the City is missing an important change that could promote infill: to amend the R7 zone to allow partition under the same rules as R5. I would go further, and suggest that the City, during Periodic Review of its Comprehensive Plan, consider eliminating the R7 designation/zone

entirely, as it seems to somewhat arbitrarily prevent partition of large lots where reasonable infill could occur. I think you will agree that amending the R7 zone would have been a much less controversial step than the more ambitious “middle housing” initiative. Yet the City seems to have overlooked this idea. Surely there must be hundreds of similar situations with large lots in R7 where owners wish to partition all over Portland especially in SW. Changing this could result in additional infill with no impact on livability. I urge the City Council to give serious consideration to this idea, now and in the future. I am writing out of self-interest of course, but also as a one-time urban planner, with an interest in sound public policy. Philip J Quarterman

Testimony is presented without formatting.

Constance Harvey

#143978 | May 31, 2020

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

PLEASE include the highlighted text on page 8, item E, Triplexes and fourplexes. That block of SW Dewitt is NOT maintained by the city and since the residents maintain it, a triplex or fourplex should not be added to that corner. That corner is already a dangerous intersection, people speed on SW 18th all the time.

Testimony is presented without formatting.

Brittany Bogue

#143980 | May 31, 2020

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

I am submitting testimony in favor of the residential infill project. Portland badly needs more, better, and less expensive housing in every neighborhood. I strongly support the re-legalization of duplexes, triplexes, and four-plexes in single-family neighborhoods. I am also I favor of allowing projects with additional units so long as half of the units are deeply affordable. The city needs an overarching (and funded) anti-displacement toolkit. Portland needs apartments to be legal in exclusive neighborhoods near transit.

Testimony is presented without formatting.

Matt Doyle

#143981 | May 31, 2020

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

Portland has positioned itself well as an attractive place to live. Part of the attractiveness is access to housing options near jobs, transit, and community. This has caused considerable growth, but also decline, as some feel their housing options are so limited it restricts access to what makes the city an attractive place to live. This forces long-time residents out of their communities as supply is crushed by demand, driving rent beyond reach, and discourages others from trying to live here to begin with. We need to rethink how we house our community in terms of our current reality. 40% of Portland is zoned for single family housing, an unrealistic percentage to maintain given the housing demands put on our city today. The Residential Infill Portland will help address this by unlocking more dense housing in our city where we need it most, allowing people to be closer to work and play, releasing the mounting pressure on our existing supply, and building a stronger Portland.

Testimony is presented without formatting.

Emily Platt

#143982 | May 31, 2020

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

Testimony to the Portland City Council on the Residential Infill Project, Recommended Draft To Portland City Council, RIP has the laudable goal of providing affordable housing for long-term and more recent residents of Portland. It is obvious that development is booming in Portland, benefiting developers and wealthy real-estate speculators. I don't see how RIP will be able to rein in developers who are only looking to make money, not improve neighborhoods, as I have witnessed in my own community. From my understanding, RIP will limit the size of buildings, but increase the allowed number of buildings per lot, a goal which I whole-heartedly support. However, just because the houses are smaller and there are more of them, it doesn't follow that they will be affordable to someone making 35,000\$ a year – the salary of an essential worker employed at New Seasons, for example. Developers will charge what the market will bear. For many reasons Portland is an attractive place to live and competition for housing will only increase, even as more units are built. A few more comments and suggestions for improving RIP: 1. Environmental concerns a. Loss of tree canopy: require developers to save trees/plant native plants. Loss of tree canopy will negatively affect birds, which are already struggling, as well as increase the “heat island effect”. b. Natural gas: Do we really want to commit to decades of gas-fired houses in a time of climate crisis? New housing should be highly energy efficient and not be hooked up to gas. This will also keep utility costs low. As I'm sure you're aware, the greenhouse gas potency of methane is almost 2 orders of magnitude more than that of carbon dioxide. c. Climate refugees: Portland still has a pretty good climate, and refugees will arrive from within our own country, not to mention Mexico and Central America. For refugees fleeing unlivable climates, affordable housing will be key to rebuilding their lives. During a time of climate disruption housing prices could rise and I don't see how the City is going to be able to keep a lid on prices. d. Wastefulness of teardowns: My house is 118 years old, and pretty dang solid. It is built of old-growth fir. I consider my house to be in danger of being torn down if I am not careful to whom I sell (not that I'm moving anytime soon!). It would be so wasteful for my house to end up in a land-fill. Only structurally unsound houses should be torn down 2. Consequences of more dense development a. Increased car population: There will need to be strong disincentives directed at car ownership (fees? Congestion pricing?), as well as strong incentives to use public transportation (work with Metro to lower fares), and other transportation modes. b. Increased noise: A city-wide ban on machines powered by 2-stroke engines would be a good place to start. Adequately staff a noise board to handle neighborhood noise disputes. c. Loss of solar access: effects on existing roof-top solar and backyard garden plots and habitats. Loss of solar access affects

me directly since we have roof-top solar and are avid backyard gardeners, as well as stewards to a thriving backyard habitat. I hope that the height limits outlined in RIP can have some “wiggle” room to be worked out between stakeholders (developer and home owner). Backyard vegetable gardens will become an important food supplement as interruptions to the food chain, due to climate disruption and pandemics - to name just two causes, become more common. A poorly implemented RIP could decrease food resiliency. d. Loss of trees: Noted above 3. Equity a. RIP will be enacted only in poorer neighborhoods. I live just south of Ladd’s addition. While Ladd’s addition is being re-zoned for denser development in RIP, there is no way that is going to happen. From my observations, it is a wealthy, stable community with few rentals and low home-sales turnover. The houses there are not good targets for teardowns since many of them are older and of historic importance (because of the architect that the original wealthy owner hired, for example) and since fewer of them are rentals, they are in general better maintained. My neighborhood at 18th and Clinton has seen many teardowns (at least some of them poorly maintained rentals). There are many charming small Victorians that were originally built for working people, for example, Italian produce workers early in the last century. These houses are just as an important part of Portland’s history as the houses built for the rich in Ladd’s addition, yet they are endangered by RIP and that just makes me sad. The burden of RIP will not be borne equally – wealthy neighborhoods within the RIP-zone will be relatively unchanged while poorer neighborhoods will be unrecognizable. That might be OK, if at least the new housing is affordable, energy efficient, and durable. I’m skeptical. Poor neighborhoods will also have to bear the brunt of construction disruption. Within the last 5 years there have been at least 5 teardowns (and 2 other infill houses constructed) within a three-block radius of my house. The noise (power tools, shouting, etc), parking issues with large trucks and cement mixers, etc, is very disturbing and anxiety producing. The work often proceeds 7 days a week. I doubt if this has happened much in Ladd’s addition or Laurelhurst neighborhoods, and forget about the West Hills! b. RIP favors commercial developers. I think RIP could work better and be less damaging to neighborhoods if there were more support for independent homeowners to make infill changes to their properties. This could take the form of low interest loans and logistical advice on planning and permitting. It has been my observation that owner-initiated housing projects use better materials, are more carefully constructed, and are more sensitive to neighborhood concerns; the owners have to live alongside their neighbors, after all! Thank you for this opportunity to testify. Sincerely, Emily Platt

Testimony is presented without formatting.

kristina pierce

#143983 | May 31, 2020

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

The short sidedness of densifying the city is harming the livability of my neighborhood. New buildings without parking is clogging the old streets. Think!!!

Testimony is presented without formatting.

Terry Parker

#143987 | June 1, 2020

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

From the time the Residential Infill Project was first conceived by way of a stakeholder committee that was a stacked with developer interests, it is my belief the interests of homeowners who have long term investments in the community have been under represented and over shadowed by for-profit developer interests and build baby build housing advocates that want more density everywhere. The negative impacts of adding more density in single dwelling zoned neighborhoods must not be ignored. Due to City Hall being closed to the public and the hearing being held electronically, many people including myself who do not have internet access at home are being left out of what should be a totally open public process. Since RIP is such a contentious issue, any City Council decisions that would permanently change city-wide zoning codes and regulations including the types of the development that can take place residential neighborhoods should be delayed until such time City Hall reopens and face to face public hearings can be held. I am sending you my testimony by sitting in my SUV utilizing my laptop on limited time battery power to connect with the wifi outside of a closed Multnomah County Library. In addition to Portland's treasured parks and public golf courses, one of the characteristics that makes Portland a beautiful, livable and tourist friendly city is the existing single-family home neighborhoods. The Residential Infill Project (RIP) experiment is closely related city-wide to what happened in Albina in the 1960s. The destruction of in-city/established single family home neighborhoods could conceivably result in the gentrification and displacement of middle and working class families fleeing to the suburbs. Moreover, RIP was never designed to provide affordable housing. The last minute amendment to add six units per individual lot to the density mix is likely to become an inadequate and failed attempt to create some sense of affordability. Increasing density in single-dwelling zoned neighborhoods with RIP as the blueprint will not only target demolishing the most affordable homes, but also historic and architecturally significant homes and structures. The greenest buildings are the ones already built. Adding density in single-dwelling zoned neighborhoods will also reduce and eliminate green yards that produce oxygen, and remove mature trees that act as carbon offsets thereby destroying the neighborhood environment and ambiance. A turf area 50' x 50' can produce enough oxygen to meet the daily needs of a family of four. An average golf course can produce enough oxygen to support 4,000 to 7,000 people. RIP will allow heat island type development to take place directly within single dwelling zoned neighborhoods. As a kid who was born in Portland and grew up living in an approximate 1500 square foot modest single family home on an approximate 5000 square foot lot, my neighbor and I had a six hole golf course crisscrossing our adjoining front yards where we used

plastic practice golf balls and tuna cans for the cups. In my back yard, there was just enough room to set up and play croquet corner to corner. Along with my sister and her friends, we had monopoly tournaments and played other board games under the trees. In the garden I played with my ten cent Tootsie toy cars on paved roads of dried mud formed with a garden trowel that washed away every time it rained. My neighbor and I even built a ramshackle clubhouse in his yard, using what ever building materials we could find. If the Coronavirus has taught us anything, it should have taught us that a virus spreads faster in areas that have high density housing and housing with little or no adjacent outdoor living space. Be it an adult barbeque or a kids activity, the proposals and amendment to permit the building of three to six units on all R2.5, R5 and R7 residential single family zoned lots does not allow for enough adjacent outdoor space for such activities and still have social distancing should another pandemic occur. Therefore, the primary purpose for allowing this larger footprint and out of scale dense development in R2.5, R5 and R7 single dwelling zoned neighborhoods coupled outdoor amenities is for the most part non-existent. This is not the desired outcome. Likewise, the Coronavirus has also taught us the value of drive through pickup windows and that driving in one's own car is social distancing transport. If the expectation is that people will transition from internal combustion powered vehicles to electric vehicles, access to electricity to connect over night charging devices is a necessity. The current range of an electric car is approximately 200 miles, even less if the heater or air conditioner is being used. A full quick charge at a charging station takes away about one-half of an hour of travel time. 89% of households in the Portland-Metro area have one or more cars. The city's own studies suggest that 72% of households in new large multi-unit buildings without parking have one or more cars. Adequate off-street parking is needed which equates to no less than three parking spaces for every four units that also includes access to electricity for plugging in charging devices so electric vehicles can be charged over night. There is a demand for this off-street parking and it needs to be required with all new residential development. Furthermore, it should be noted that without adequate off-street parking, residential streets will likely become unacceptable full-time car storage lots. Curb cuts for driveways in residential neighborhoods allow access to homes for service and delivery vehicles, create a space for garbage and recycle pickup, and allow direct access to TriMet's Lift or other on-call vehicles for hire that mobility impaired utilize. The 2035 Portland Comprehensive Plan serves as the starting point from which changes to the Municipal Code are made. Without amending the plan, RIP fails in this matter and therefore has been originated by a flawed process. RIP and the amendments fail to provide zoning implementation tools that would be equal to or more supportive of the Comprehensive Plan as a whole. No such evaluation against the Plan's relevant goals and policies was made or available for public review. RIP and the amendments fail to comply with the Buildable Lands Inventory and Growth Allocation GIS model which serves as a basis for utility and transportation assumptions. The proposed Table Summary of Development Standards fails to provide a clear land use designation in single-dwelling zones. The Comprehensive Plan designates specific areas to apply appropriate zoning for middle housing. Instead, RIP allows a city-wide implementation of densities in single-dwelling zones that are normally found in multi-family dwelling zones. No public facility adequacy study has been published to identify the impacts on the

existing and future availability of urban public facilities and services; and no system capacity analyses or foundation of public investment (such as for water, sewer, transportation and roadway needs) has been conducted. Additionally, no adequacy study has been published to identify the impacts of not requiring adequate off-street parking, the positive benefits of curb cuts, the future residential needs for charging electric vehicles overnight and the impacts of removing green yards and cutting down large trees that provide carbon offsets. Higher densities including triplexes and quadplexes etc. should be restricted to town centers, major corridors and close-in to transit centers, identified as the places to locate multi-family housing in Portland's Comprehensive Plan. Most Portland neighborhoods have one or more of these types of locations likely meeting the directives in HB2001. Pilot projects to identify affordability and impacts should also be allowed to take place in neighborhoods where a majority of residents want more density. New structures in single dwelling zoned neighborhoods should not be built in isolation and match the scale and setbacks of the surrounding structures within those diverse neighborhoods. Finally, investing in home ownership is a form of creating wealth, and likely the biggest lifetime investment a family makes. On the other hand, RIP appears to propose replacing affordable home ownership availability with more corporate owned rental properties. By increasing the allowable density, RIP increases the cost of the land thereby increasing the costs of all housing along with setting out the "for sale" sign offering up single family home neighborhoods to for-profit developers for the highest bid. It opens the door to the kind of neighborhood destruction that is taking place in Vancouver, B.C. where one in every four single family homes being sold is demolished. If RIP is to be adopted, either the entire one size fits all Residential Infill Project and any amendments must be sent back to the PSC to comply with Portland's Comprehensive Plan, or the Comprehensive Plan needs to be updated with a rigorous face to face public process. Since there is already enough land zoned to meet Portland's housing needs, the least contentious option is to follow the already approved Comprehensive Plan with RIP and the proposed amendments declared as null and void. Respectfully submitted, Terry Parker Northeast Portland

Testimony is presented without formatting.

Rod Merrick

#143988 | June 1, 2020

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

Deeper Deception: RIP Lacks Public Support and Accountability. This may not surprise everyone. The Residential Infill Project is not a “modernization” of Portland’s zoning code but an untested and radical inversion. The impacts are as divisive as its “RIP” acronym might suggest- effectively handing over single family neighborhoods across the city to investors for random density redevelopment. The advocates including BPS planners, both mayoral candidates, and boosters all offer aspirations and ideology. Maybe it will be needed in 20 years. Maybe it will welcome new neighbors. Maybe it will produce “innovative” housing. Maybe it will advance social justice. Maybe it will lower housing costs. Maybe it is compelling in that unlikely bed-fellows 1000 Friends (under various guises), real estate investors, and the home builders joined forces to advance their own interests and ideological notions of how Portlanders should live. Maybe. Or maybe it has become a race to displace – our most disadvantaged citizens, our most affordable housing, our most desired housing types, our adopted comprehensive planning goals for livability, home ownership, stable neighborhoods, compatible infill, and goals for resilience and sustainability. Leading to this point of final decisions, there has been no testing, an embarrassing lack of analysis, and no framework or standards for assessing the impacts of these far reaching policies. RIP emerged from an increasingly ham-fisted process flagrantly disregarding thoughtful public testimony in opposition over several years. Even the heavily lobbied planning commission (PSC) found it a challenge to provide a green light to the previous iteration. The reduced lot sizes and “deeper affordability” amendments, under consideration this week by the four remaining City Council members, continue this pattern. What has become crystal clear is that new higher density rental/condo housing displacing older single family housing is not about affordability. Encouraging 6 and 8-plex housing everywhere is simply deeper deception. Displacement of every sort has been one of the Achilles heels of this project. Displacement mitigation remedies remain ill-conceived, without standards for accountability, and of course unfunded. For these reasons, we urge that if the RIP advances it must be constrained by a mandated periodic assessment; this to be conducted by an independent auditor and published at least every 5 years until the next (2055?) Comprehensive Plan is approved. This audit should include at minimum an assessment of the following indicators associated with additional density building permits in the “Single Family Zones”(R2.5-R20). • Transportation impacts and specifically: Transit ridership, pedestrian travel, parking congestion, and auto ownership patterns associated with the additional density. • Displacement of lower income residents and communities associated with the additional density. • Housing Affordability relative to income associated with the additional density.

• Ownership patterns (owner occupied, small scale investor owned, corporate ownership) associated with the additional density building permits. • Displacement of middle income families with children associated with the additional density. • Urban tree canopy reductions and changes in the heat sink characteristics. • Public school participation rate associated with the additional density. • Complaints about incompatibility of scale and design of structures associated with the additional density building permits. In this season of ugly surprises and crisis, let's take careful thoughtful steps for a change. We have time on our side -time to assure that assessment is integral to the approval of the RIP and time to clarify RIP's purpose; time to evaluate outcomes and to allow for adjustments in guiding development of our city.

Testimony is presented without formatting.

Stephanie Winters

#143989 | June 1, 2020

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

I urge the City Council to consider a pause on the Residential Infill Project and evaluate the priorities of our city. There are many issues that need further consideration. COVID-19 has changed our world. The relationship between urban density and a life-threatening contagion needs further research. The mental health of our citizens must be considered during a pandemic and homes with limited outdoor space prove to be detrimental. From an environmental standpoint, the demolition of historic homes to build multiplexes that will require more maintenance in the long run, is contrary to the sustainability our city desires. The effects on our infrastructure and school systems will be devastating and costly. Lastly, do we want to lose the charm of our beautiful and historic neighborhoods? These homes need our protection. These communities need our support as they consist of the families who tend to be the most financially and emotionally invested citizens of our city. Our older neighborhoods are the face of Portland family life. They are beautiful. I encourage the Council to explore more suitable locations for multiplexes. Preserve our family neighborhoods, please. Prioritize our current residents over wealthy, out of state developers. RIP will not solve the housing problem but will damage our city in many ways.

Testimony is presented without formatting.

Eastmoreland Neighborhood Association

June 1, 2020

To: Mayor Ted Wheeler
Commissioner Chloe Eudaly

Commissioner Amanda Fritz
Commissioner Joann Hardesty

Cc: Record Testimony

Dear Mayor and Commissioners,

The Eastmoreland Neighborhood Association shares widespread concerns about the lack of affordable housing and strongly supports efforts to address this need in ways that are consistent with the 2035 Comprehensive Plan. While the Residential Infill Project (RIP) Recommended Draft makes a number of recommendations that we support, we find that it is overall unsupportable. The ENA has discussed this proposal over several years and has worked with many other neighborhoods to understand and formulate our position during the formulation of an increasingly top down, aggressive, and we believe irresponsible vision for the future of Portland's livability.

RIP seems likely to exacerbate, rather than alleviate, housing affordability and dislocation problems. RIP also falls short in addressing major goals of the 2035 Comprehensive Plan, including and especially Goal 4.A: context-sensitive design and development, which calls for "new development [that] is designed to respond to and enhance the distinctive physical, historic and cultural qualities of its location." ([Comp Plan Goal 4A](#)).

Long on ideology, short on analysis are both the RIP and the state legislation HB 2001, 2003, etc.. The impacts will be far reaching. There may still be time to get the details right. It is time to rework RIP following simple principles that are consistent with the 2035 CP:

- Direct density around centers and where appropriate along corridors with access to frequent and reliable transit.**
- Require Affordability as the tradeoff for additional density in Single Family Zones**
- Improve the Zoning Code to provide Building Design that respects the neighborhood context.**

Top down RIP policies are the result of a well-funded campaign funded by development interests and lead by 1000 Friends of Oregon under various brand entities to reshape our city outside the bounds of the comprehensive plan. Advocates have painted a rosy picture of what amounts to a handout to development interests –solutions that do not respond to the cost of housing or the shortage of land for housing. Widespread legitimate objections been brushed aside by Planning staff.

As Portland and many other cities learned from the urban-renewal era, well-intentioned programs sometimes yield disastrous results. According to the Buildable Land Inventory, Portland's existing zoning already provides a 20 year supply of land for all types of housing, *including* the promised "innovative housing". The high demand regionally for single family houses suggests that RIP may result in additional

Eastmoreland Neighborhood Association

pressure on the region's urban reserves, drive inequity, and reduce diversity in the City's housing choices.

Our testimony includes entails recommendations for constructive principle-based reworking the RIP during the coming years that will accommodate additional housing density without harm to the character and values that make Portland an attractive and healthful place to live, work, and recreate.

Our concerns with the macro-impacts of RIP includes the following six issues:

Issue #1: RIP upzoning provides no assurance that new replacement housing will be either affordable or family-friendly while it incentivizes the demolition of smaller, less expensive houses, thereby displacing families.

Issue #2: A Bureau of Planning and Sustainability economic analysis has concluded that RIP will yield a relatively modest number of new housing units, but will likely displace concentrations of existing residents, particularly those living in more affordable housing units.

Issue #3: RIP allows scattershot densification that fails to advance Portland's walkability, sustainability, and transportation goals. It conflicts with policies of the 2035 Comprehensive Plan.

Issue #4: Portland is a city of distinctive neighborhoods, yet RIP takes a "one-size-fits-all" approach by applying the same housing-scale and density allowances to residential neighborhoods throughout the city. This approach conflicts with at least 11 policies in the Comprehensive Plan (CP I-27)

Issue #5: RIP fails to adequately address environmental and waste stream impacts of housing demolitions and undermines the benefits from large tree canopies.

ISSUE #6: RIP's promise to produce or induce "right-sized housing" and offer more "housing options" is untried, untested, and unproven in the face of market demand and economics. Portland will need to begin planning for beyond 2035 but not in haste, not without carefully assessing the options, and not without a vision beyond door-count planning offered by the RIP.

We hope that you will take the time to review the recommendations for the above issues beginning on page 6. You will find a full explanation of the three principles followed by detailed recommendations for reworking the RIP consistent with those principles.

Thanks for your time and consideration.

With best wishes for the New Year,

Rod Merrick, Board President
Eastmoreland Neighborhood Association
Email: president@eastmorelandpdx.org

C: ENA Board of Directors

Eastmoreland Neighborhood Association

PRINCIPLES FOR RESIDENTIAL INFILL AND DENSIFICATION ALIGNED WITH THE 2035 Comprehensive Plan (CP)

1. Siting, Placement And Urban Form. Direct density around centers and where appropriate along corridors with access to frequent and reliable transit.

- Zone for “Middle Housing” (meaning duplex, triplex, quadplex, and row houses) as a transition from higher to lower density. Encouraging *random density and scale is inconsistent with sensible planning.* (CP Policies)
- Promote density in Single Family Zones (SFZ) to support streetscape, site, and building designs that encourage healthful Walking Scale Neighborhoods with transportation supportive siting of Middle Housing. (CP Policies 4.10 & 9.17) (CP Policy 4.6). (CAP, p. 51, 103-104) (CP Policy 3.2).
- Meet Portland’s housing needs in ways demonstrated to be consistent with desired outcomes and consistent with environmental, sustainability, resilience, and public health policies in the [2035 Comprehensive Plan](#) and [2015 Climate Action Plan \(CAP\)](#).
- Respect and enhance the distinctive characteristics of each neighborhood including the Inner Ring Districts (Policies 3.42 & 3.43).

2. Displacement and Affordability. Require Affordability with Density in Single Family Zones (SFZ).

- Focus additional density to minimize *displacement* of families and *demolition* of housing to maintain affordability, diversity, stability, character, and vibrancy of neighborhoods.
- Offset redevelopment upzoning incentives with Effective Anti-Displacement Programs.
- Constrain demolition of existing sound housing to limit the impact on the waste stream and on the carbon foot print for replacement construction. Preserve greater affordability inherent in existing housing and encourage rehabilitation and adaptive reuse of buildings (CP Policy 4.17 & 4.60) and to minimize displacement. (CP Policy 4.48).
- Allow three-plex and four-plex densities outside Middle Housing overlay zones only for dedicated low income housing as a *conditional use*.

3. Context Responsive Building Design. Place matters. People matter. Context matters.

- Base urban form and building design on neighborhood scale and context. *“One size does not fit all.”* (CP 4.3 including the Inner Ring Districts (Policies 3.42 & 3.43). Celebrate significant places (Policy 3.12)
- Use zoning regulations to preserve and build well-designed places that engender civic pride and so that people will be *motivated to sustain* them for many generations.
- Work with neighborhoods to encourage well-designed appropriately-placed density that provides additional housing, meets market needs, and supports the [Climate Action Plan](#). See p. 5 of CAP)

Eastmoreland Neighborhood Association

DETAILED RECOMMENDATIONS FOR RIP INFILL AND DENSIFICATION

1. Siting, Placement And Urban Form

- 1.1 Use zoning to reinforce a continuum of scale and density to support Neighborhood and Town Centers and Complete Neighborhoods. Strategically overlay SFZs with areas of “Middle Housing”. Multiplying housing density by a factor of 3 to 4 everywhere results in diffuse, unplanned density. This further implies long-term, unrestricted redevelopment of all Portland neighborhoods with multi-family form and density resulting in pressure to expand the Urban Growth Boundary for single family homes.
- 1.2 Limit “Middle Housing” *overlay* in SFZs within 400 feet of designated centers and within a 300-foot path of most transit stops along the 15 frequent, reliable transit corridors where appropriate. This will reduce congestion and auto dependence and improve functional walkability. (CP 3.2)
- 1.3 Pilot areas in which to test zoning regulations for RIP density increases in a few self-selected neighborhoods. Evaluate impacts on displacement, market viability, affordability, transportation, and land prices.
- 1.4 Protect structures of local significance by updating the Historic Resource Inventory (HRI).
- 1.5 Work with neighborhoods and communities to identify their distinctive characteristics and establish clear and objective design standards that encourage compatible well-designed “Middle Housing” consistent with the Comprehensive Plan, Goal 10 of Oregon land use law and the Climate Action Plan.

2. Displacement and Affordability.

- 2.1 Postpone RIP adoption until the City’s anti-displacement protections are not merely aspirational but adequately funded, demonstrably effective, enforceable, and approved. Evaluate the effectiveness of the proposed zoning changes during the pilot period of at least 5 years as described in 1.3 above.
- 2.2 Reduce System Development Charges (SDC) for affordable triplex and quadplex units that are comparable in size and features to the other units and that are permanently affordable at 80% of Median Family Income (MFI).
- 2.3 Impose a substantial permit surcharge for demolition of existing housing if sound and habitable when purchased. Require deconstruction of all demolished housing. (Revise City code 24.55.150 accordingly)
- 2.4 Within the “Middle Housing” zoning overlay, provide incentives (excluding any FAR bonus) for internal conversion of single-family houses to multiple units. Internal conversion means retaining at least a majority 3 original exterior walls and roof. Incentives could include property tax abatement and reduced SDC fees.
- 2.5 Retain single family zoning for one and two family structures in most areas of the city to provide long term options for families to reside in this housing type that effectively addresses the desire for

Eastmoreland Neighborhood Association

independence, access to nature, air and light, acoustic privacy. They are proven adaptable to changing needs of families and provide for long term occupancy. According to the recent Metro study, the single family dwelling is overwhelmingly the preferred housing type. It is also the housing type most in demand and for which there is the greatest shortfall.

- 2.6 **Affordability Bonuses:** For permanently affordable to households earning no more than 80% of the Median Family Income (MFI), System Development Charges and tax rates should be reduced or waived under bond funding for affordable housing in RIP overlay zones.
- 2.7 **Visitability bonus.** Houses and ADUs that are built to meet visitability standard should receive a subsidized 10% discount on building permit fees.
- 2.8 **No FAR bonuses may be used.** Maintain single standard to assist with affordability and remain true to purpose of the RIP. The “density bonus” comes in the form of profit for the owner or developer granted by the RIP. Density bonuses remove incentives for providing affordable houses.
- 2.9 **Conclusions in the Johnson economic analysis used to support the RIP indicated that the RIP densities in SFZs will replace single family houses with smaller investor owned rental units. Not only will the demolition lead to a loss of a more affordable home and displacement, but the replacement multifamily housing favors investor ownership. This is one of many unintended consequences of the untested RIP.**

3. Context Responsive Building Design. Place matters. People matter. Context matters.

- 3.1 **Retain the existing 2015 zoning code minimum lot size standards for all housing types for SFZs, i.e. R2.5, R5, R7, R10, R20. There is no justification for further reducing these already deeply compromised standards.**
- 3.2 **“Right size” new housing. One size does not fit everywhere. Adjust limits to the floor area ratio (FAR), height, and front and side yard setbacks when designing for new and remodeled structures to ensure that new construction is compatible with its surroundings. Following are modifications to the zoning code applying to all SFZs including the Middle Housing over-lay zones.**
 - a. **Allowed floor area ratio (FAR) applies to all occupied spaces on a buildable lot including basements wherever basement ceiling framing is > 3 feet above exterior grade and in attics where the finished ceiling is > 80 inches clear in height above the floor.**
 - b. **R2.5 zone. The maximum FAR is 0.6 x the site area. For lots adjacent to higher density zones (R2, R1 etc.) the maximum FAR is 0.7.**
 - c. **Zones R5, R7, R10, R20. The maximum FAR is 0.6 x the site area after adjusting for the size of nearby houses within 150 feet of the side lot line on the shared block face.**
 - d. **Zones R5, R7, R10, R20 is calculated by applying a multiplier of 1.5 x the average floor area of houses within 150 feet based on data base information provided by Portland Maps and not to exceed the maximum FAR for the zone.**

Eastmoreland Neighborhood Association

- e. Height limits for zones R5, R7, R10, R20 are adjusted based on lot width and 120% of the tallest house of nearby houses within 150 feet of the side lot line on the shared block face up to the maximum height the height: For lots less than 75 feet wide, 24 feet up to a maximum of 30 feet. For lots wider than 75 feet wide at street front 30 feet up to a maximum of 32 feet. Height limits for detached accessory structures: maximum 15 feet. Height limits for R2.5 zone: maximum 32 feet.
- f. Minimum Front Setback: For R2.5: 10 feet front and 4 feet on side of corner lot. For R5-R7: 15 feet front and 8 feet on side of corner lot. For R10-R20: 20 feet front and 15 on side of corner. For infill, match or average setback for adjacent structures.
- g. Site Coverage: R2.5=.50% of site area. R5, R7 = 40% of site area, R10, R20 30% of site area. Allow 5% increase for external garage or ADU in R5, R7, R10, R20.

3.3 We support or recommend revising the standards in the "Building Design" recommendations in the "RIP Staff Report August 2019 Recommended Draft" as follows:

- a. Support. Measure "height" from lowest point not the highest point (#8a)
- b. Support. Standards for front door height above the grade.
- c. Support. Require lots on alleys to access off street parking access from alleys.
- d. Revise. Allow eaves to project up to *within 18 inches* of side and rear setbacks consistent with fire code requirements (#8b)
- e. Support. Lots 25 feet and narrower must be constructed as attached structures with side/rear yard parking. Discourage "skinny houses" that are energy inefficient, make poor use. Revise. Standards for garage width: 12 feet within 30 feet of front lot line.(Not 50% of front street facing wall)
- f. Revise. Prohibit parking between the front of the building and the street for lots *less than 40 feet wide*.
- g. Revise. Require one off-street parking space for all housing types where *lots are >30 feet wide*.
- h. Revise. Retain *corner lot* duplex requirements that entries face opposite sides of the corner.
- i. of available land, and when fitted with street facing garages degrade the streetscape
- j. There is more.....to come

3.4 Improve and clarify the zoning code. Revise zoning code structure to consolidate requirements for a given site with graphic representations. Improve clear and objective design standards.

Following is a summary of our primary concerns with the macro- impacts of RIP and our recommendations for addressing each.

Issue #1: RIP upzoning provides no assurance that new replacement housing will be either affordable or family-friendly while it incentivizes the demolition of smaller, less expensive houses, thereby dislocating families.

Recommendation: Require affordability as the tradeoff for additional density in single family zones. Allow demolitions of sound, affordable housing only if replacement units are permanently affordable at 60-80% of Median Family Income.

Eastmoreland Neighborhood Association

Issue #2: A Bureau of Planning and Sustainability economic analysis has concluded that RIP will yield a relatively modest number of new housing units, but will likely displace concentrations of existing residents, particularly those living in more affordable housing units.

Recommendation: To avoid intensifying already serious displacement problems, before adopting RIP, the city should complete an Anti-Displacement Action Plan, assure long-term funding for its implementation, and develop a system for tracking ADAP's effectiveness.

Issue #3: RIP allows scattershot densification that fails to advance Portland's walkability, sustainability, and transportation goals. It conflicts with policies of the 2035 Comprehensive Plan.

Recommendation: Focus density around centers and along corridors with frequent, reliable and safe transit service. (See [Comp Plan Policies 3.2](#) and 5.23, pp. GP3-8 & GP5-9) Analyze the transportation impacts of scattershot densification. As called for in the Comprehensive Plan, "[e]nsure that new high-density and large-scale infill development adjacent to single dwelling zones incorporates design elements that soften transitions in scale and limit light and privacy impacts on adjacent residents." ([Comp Plan Policy 4.30, p. GP4-9](#))

Issue #4: Portland is a city of distinctive neighborhoods, yet RIP takes a "one-size-fits-all" approach by applying the same housing-scale and density allowances to residential neighborhoods throughout the city. This approach conflicts with at least 11 policies in the Comprehensive Plan (CP I-27)

Recommendation: Respect context. Make building design compatible with surrounding areas in single family zones especially with respect to the size, height and front setbacks of nearby structures. Transition building scale from higher to lower density using "middle housing" forms. Create affordable housing through financial and regulatory incentives, not through Floor Area Ratio bonuses that increase the allowable size.

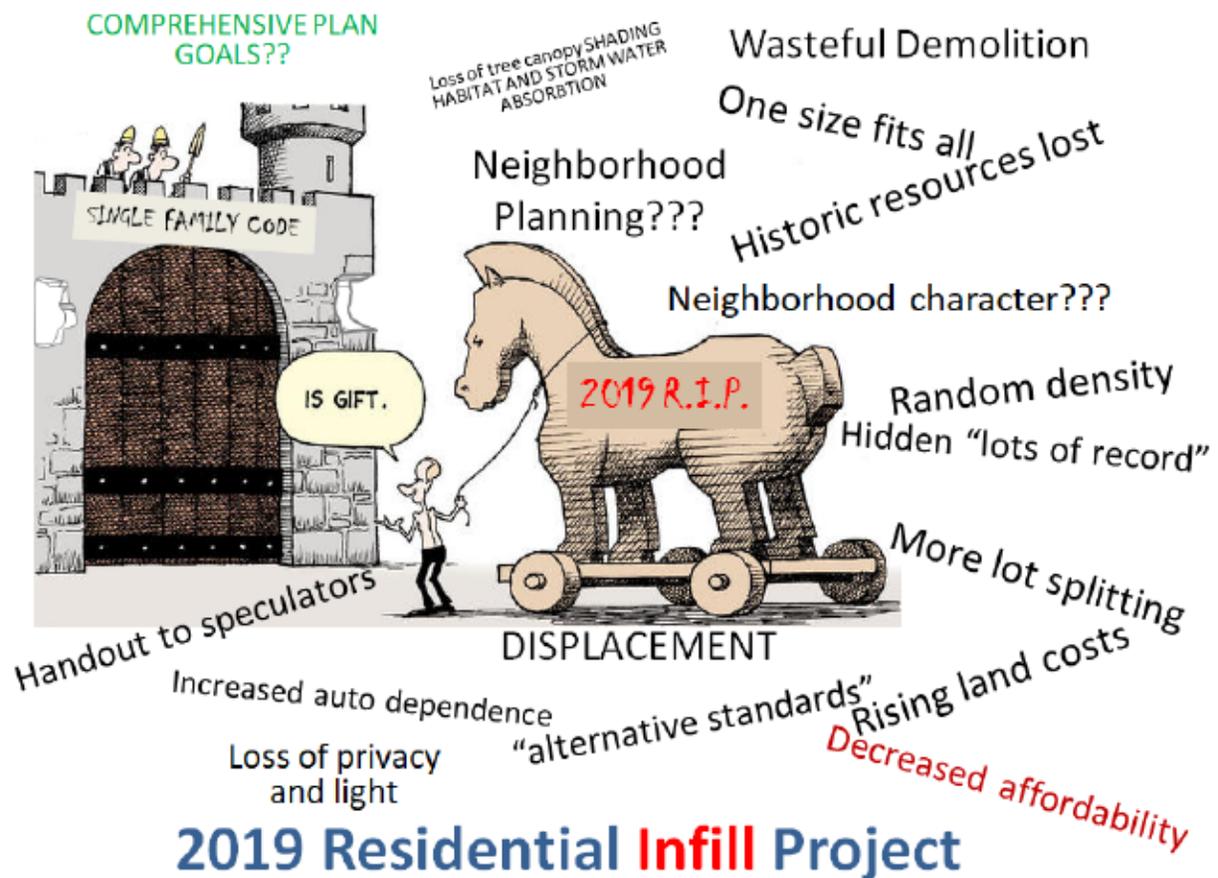
Issue #5: RIP fails to adequately address environmental and waste stream impacts of housing demolitions and undermines the benefits from large tree canopies.

Recommendation: Constrain demolition of sound existing housing to reduce the impact of replacement construction on the waste stream and on our carbon foot print. Additionally, encourage rehabilitation and adaptive reuse where appropriate to minimize carbon and waste impacts, preserve mature trees, minimize community disruption, and provide more affordable homes. (Comp Plan Policy 4.17, 4.48, & 4.60 at pp. GP4-7, GP 4-11, & GP 4-13). Require that RIP analysis include energy, environmental, and waste stream impacts.

ISSUE #6: RIP's promise to produce or induce "right-sized housing" and offer more "housing options" is untried, untested, and unproven in the face of market demand and economics. Portland will need to begin planning for beyond 2035 but not in haste, not without carefully assessing the options, and not without a vision beyond door-count planning offered by the RIP.

Recommendation: Pilot the proposal. Before applying RIP's far-reaching and potentially irreversible concepts city-wide, conduct and assess pilot projects in a few self-selected neighborhoods to determine whether the results line up with the desired goals. Create locally appropriate strategies by involving these communities.

Eastmoreland Neighborhood Association



Rod Merrick

#143990 | June 1, 2020

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

The Eastmoreland Neighborhood Association shares widespread concerns about the lack of affordable housing and strongly supports efforts to address this need in ways that are consistent with the 2035 Comprehensive Plan. While the Residential Infill Project (RIP) Amendments attempt to rescue a fundamentally flawed project, we find that it is overall unsupportable. The ENA has discussed this proposal over several years and has worked with many other neighborhoods to understand and formulate our position during the formulation of an increasingly top down, aggressive, and we believe irresponsible vision for the future of Portland's livability. RIP seems likely to exacerbate, rather than alleviate, housing affordability and dislocation problems. RIP also falls short in addressing major goals of the 2035 Comprehensive Plan, including and especially Goal 4.A: context-sensitive design and development, which calls for "new development [that] is designed to respond to and enhance the distinctive physical, historic and cultural qualities of its location." (Comp Plan Goal 4A). Long on ideology, short on analysis are both the RIP and the state legislation HB 2001, 2003, etc.. The impacts will be far reaching. There may still be time to get the details right. It is time to rework RIP following simple principles that are consistent with the 2035 CP:

- Direct density around centers and where appropriate along corridors with access to frequent and reliable transit.
- Require Affordability as the tradeoff for additional density in Single Family Zones
- Improve the Zoning Code to provide Building Design that respects the neighborhood context.

Top down RIP policies are the result of a well-funded campaign funded by development interests and lead by 1000 Friends of Oregon under various brand entities to reshape our city outside the bounds of the comprehensive plan. Advocates have painted a rosy picture of what amounts to a handout to development interests – solutions that do not respond to the cost of housing or the shortage of land for housing. Widespread legitimate objections been brushed aside by Planning staff. As Portland and many other cities learned from the urban-renewal era, well-intentioned programs sometimes yield disastrous results. According to the Buildable Land Inventory, Portland's existing zoning already provides a 20 year supply of land for all types of housing, including the promised "innovative housing". The high demand regionally for single family houses suggests that RIP may result in additional pressure on the region's urban reserves, drive inequity, and reduce diversity in the City's housing choices. Our testimony includes entails recommendations for constructive principle-based reworking the RIP during the coming years that will accommodate additional housing density without harm to the character and values that make Portland an attractive and healthful place to live, work, and recreate. Our concerns with the macro-impacts of RIP includes the following six issues:

Issue #1: RIP upzoning provides no assurance that new replacement housing will be either affordable or family-friendly while it incentivizes the demolition of smaller, less expensive houses, thereby dislocating families. Issue #2: A Bureau of Planning and Sustainability economic analysis has concluded that RIP will yield a relatively modest number of new housing units, but will likely displace concentrations of existing residents, particularly those living in more affordable housing units. Issue #3: RIP allows scattershot densification that fails to advance Portland's walkability, sustainability, and transportation goals. It conflicts with policies of the 2035 Comprehensive Plan. Issue #4: Portland is a city of distinctive neighborhoods, yet RIP takes a "one-size-fits-all" approach by applying the same housing-scale and density allowances to residential neighborhoods throughout the city. This approach conflicts with at least 11 policies in the Comprehensive Plan (CP I-27) Issue #5: RIP fails to adequately address environmental and waste stream impacts of housing demolitions and undermines the benefits from large tree canopies. ISSUE #6: RIP's promise to produce or induce "right-sized housing" and offer more "housing options" is untried, untested, and unproven in the face of market demand and economics. Portland will need to begin planning for beyond 2035 but not in haste, not without carefully assessing the options, and not without a vision beyond door-count planning offered by the RIP. We hope that you will take the time to review the recommendations for the above issues beginning on page 6. You will find a full explanation of the three principles followed by detailed recommendations for reworking the RIP consistent with those principles. Thanks for your time and consideration.

Testimony is presented without formatting.

Colin Cortes

#143991 | June 1, 2020

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

June 1, 2020 Dear City Council: I urge the City Council to adopt the Residential Infill Project (RIP) with the amendments proposed by staff, summarized as: - Aligning the proposals with recently adopted projects for consistency - Conforming to revised statutes - Creating a combined process for lot consolidations and property line adjustments - Providing for a "Deeper Affordability Bonus", and - Adding a historic resource demolition disincentive (Amendment 7). I urge the Council also to take two more actions: Direct staff to: 1. Research and propose to Council how amendments of system development charge (SDC) and Local Transportation Infrastructure Charge (LTIC) methodology and assessment can incentivize additional housing units through internal conversions or additions instead of full demolitions of ordinary, non-historic dwellings. For example, incentivize conversion of a house into a fourplex instead of demolition and construction of four new housing units. Establish a spectrum for a given SDC and the LTIC so that the higher the project valuation of housing, the more a developer pays, while the lesser the project valuation the developer would pay less. Luxury projects would pay more, while modest and incremental projects would pay less. 2. Track and report back to the Planning and Sustainability Commission and Council on the effects of the RIP, the ones opponents in particular most fear, within a year to 18 months of it taking effective, that is, by sometime between July 2021 and January 2022. Sincerely, Colin Cortes, AICP, CNU-A
4704 SW Beaverton Hillsdale Hwy, Apt 5 Portland, OR 97221-2968

Testimony is presented without formatting.

Susie Bacon

#144040 | June 1, 2020

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

I am fully supportive of urban RIP with the following hopeful details: Awareness that infill needs to occur in SW Portland, even among the more affluent neighborhoods NIMBY-ism needs to be eradicated. Parking capacity is a consideration for any infill. In SE Portland, very little parking has been added/provided, and car vs. pedestrian or bike has increased, and driving visibility is poor. Adding affordable housing is critical, even among the more affluent neighborhoods. Reward builders for houses that sell for \$250,000- 300,000 or a price range that teachers, police, nurses can afford. House size cannot continue to be built in the 3000-3500 SF on a 50,000 SF lot or smaller. It erodes landscape, wildlife, urban life. Please consider requiring houses to be sized appropriately to the lot. The developments we see with houses literally 6-8 feet apart and tiny grass-heavy yards are less livable than row houses. In 1947 the average 4 person household lived in 1742 SF and now it's 3400 SF. This is a problem stemming from greed and not need. Consider row houses with off-street parking required of the builder. Consider requiring eco-friendly materials as much as possible. Consider requiring builders to leave large, mature native trees and to landscape using more natives. In building tracts, require open or shared green spaces, even if they are small. Build for the future, for our young adults and children, who will not be able to afford a \$750,000 house in a neighborhood of "just a little better than you" attitudes. Build for safety, for the environment, for livability and for moderation. Conspicuous residential house consumption is ugly and unnecessary. I want diverse neighbors and neighborhoods and am fully supportive of what you want to accomplish. Thank you for helping keep Portland buildable for middle and working class families

Testimony is presented without formatting.



7688 Capitol Hwy, Portland, OR 97219

"We envision that the Multnomah Neighborhood will remain a place defined by conscientious decision about the preservation of our canopy of trees, open space, and natural areas; limited and thoughtful residential and commercial development; small businesses; and safe streets. It is our vision that the Neighborhood will retain and judiciously improve on its small-town historic charms and small-scale main street Village character. The [Plan's] policies and objectives were formulated to help realize our vision for Multnomah's future."
(Multnomah Neighborhood Plan 1995)

May 31, 2020

Subject: Multnomah Says Rip up RIP

Dear City Council,

This letter serves as the Multnomah Neighborhood Association's testimony on the Residential Infill Plan (RIP), June 3, hearing. We oppose the current iteration of the RIP and believe a house that is standing has more value than demolishing it for big-box apartments/condos.

Multnomah has had a 50/50 multi-family/single family level of density since the mid-1990's as defined by the City's 2000 comprehensive plan. Since then, we've witnessed the slaughter of many stately trees, stormwater overflows, and other environmental and social impacts. SW Portland including Multnomah is defined by hilly terrain and streets that were once streams. You already know that slopes and seeps add a level of complexity to managing stormwater especially when there's a loss of pervious surfaces. Building big-box houses and apartments is an expense that the City and taxpayers can't afford, despite the increased revenue.

Multnomah's recommendations include the following:

- Update the existing inventory of housing stock and ground truth what actually exists.
- Generate an analysis of housing needs that is based on intrinsic values. These values include costs of stormwater management (due to loss of pervious surfaces), traffic impacts, costs based on household incomes of working poor, and other values that define livability.
- Create an index of intrinsic livability traits and assign economic costs to intrinsic values.
- Press "pause" on development and let nature heal. Use the current economic downturn as an opportunity to reassess environmental priorities.

We appreciate you redefining livability and what it means to have a healthy environment.

Regards,

/s/ Maria Thi Mai

Multnomah Neighborhood Association President

503.539.4966 mnachair@gmail.com <https://swni.org/multnomah>

cc: Multnomah Neighborhood Board Members and Committee Chairs

Portland Bureau Directors and City Council

SWNI Chair, Leslie Hammond thinkleslieh@gmail.com

SWNI Director, Sylvia Bogert Sylvia@swni.org

Board Chair--Maria Thi Mai * Vice Chair--Vacant* Secretary--Vacant * Treasurer--Sim Hyde*
Committee Chairs: Equity: Will Fuller, Land Use--Jim Peterson * Transportation--Katherine Christensen * Watershed--Murphy Terrell * SW Capitol Hwy Project Subcommittee--Chris Lyons

Maria Thi Mai

#144048 | June 1, 2020

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

Letter attached from Multnomah Neighborhood Association

Testimony is presented without formatting.



June 2, 2020

TO: Commissioner Chloe Eudaly
Commissioner Amanda Fritz
Commissioner Jo Ann Hardesty
Mayor Ted Wheeler

FR: Restore Oregon

RE: Testimony on Residential Infill Project (RIP) Amendments (Hearing 6/3/20)

On the proposed amendments, Restore Oregon **opposes Amendment #6**, which effectively crams a small apartment building onto a single-family lot and further increases the financial motivation to demolish existing homes and cultural heritage.

Restore Oregon **strongly supports Amendment #7**. It is essential that we dis-incentivize demolition in historic and conservation districts. RIP incentivizes demolition everywhere else.

Restore Oregon continues to be very concerned that RIP will cost Portland dearly while having no measurable impact on what really matters: affordability, housing for families, and homelessness. To be clear, we support density as provided in the Comp Plan, which provides ample capacity to accommodate projected growth. But we fear RIP will:

- accelerate demolitions of existing affordable and family-sized housing,
- release massive amounts of carbon emissions,
- erase the cultural heritage embedded in Portland's neighborhoods,
- increase displacement, and
- severely strain infrastructure.

If these fears are unfounded, **PROVE IT!** One cannot help but compare the rush towards this over-simplified and evidence-deficient plan with the urban renewal schemes of the 60s. At the very least, the unproven assumptions baked into RIP should be piloted before being rolled out city-wide, and **a requirement to track and report the impact of RIP must be adopted.**

Thank you.

Peggy Moretti
Executive Director

Peggy Moretti

#143992 | June 2, 2020

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

Please see attached testimony.

Testimony is presented without formatting.

dean and susan gisvold

#143993 | June 2, 2020

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

Type or paste your testimony in this box...Dear Mayor and Commissioners Your consideration of the RIP amendments, and the ultimate passage of RIP, as amended, will occur during what appears to be the perfect storm playing out for the next 12-18 months that cries out for delay and reconsideration. You should delay the amendments to, and the passage of RIP for at least a year, if not longer, to get a better read on how our world will change. Will our changed world need RIP? The events and circumstances that will cause the perfect storm are: 1. Covid 19. This virus will be with us for some time, no one knows for sure how long. The 1918 epidemic lasted for 15 months. The polio epidemic even longer. The virus will cause major changes to our lives, how we work, where we work, how we educate our children, do we use public transit, where do we shop, where do we live. Are these changes compatible with or in need of RIP and its increased density. RIP is built on not requiring parking for the increased density because transit is readily available. The virus makes that statement now questionable. Does RIP help us deal with the virus? 2. Renters are or will be under siege. Articles with headlines such as An Avalanche of Evictions' Could be Bearing Down on America's Renters are appearing every day. If only partially true, vacancies appear likely, which will be sweep up by multinational investors and hedge funds looking for deals. Does RIP help us deal with mass evictions. 3. Unemployment and the resulting economic nightmare. Forty million filing for unemployment insurance, and more coming when the feds, states, cities, counties, and school districts across the nation start cutting budgets for their next fiscal year. RIP was not intended to help those without jobs and income. Passage of RIP will exacerbate the economic nightmare. 4. Homelessness will increase. We all know that RIP does nothing for homelessness or affordable housing. Developers will abandon the so called deeper affordability bonus as fast as they jumped ship on inclusionary zoning. This bonus has always been false narrative, a pipedream. Those in the under 60% MFI category need supplemental services which cannot be provided efficiently to small projects. Where are the positive examples of such projects? Are there any or is this too merely aspirational? 5. Neither RIP nor its amendments include a long-term, effective anti-displacement plan that is funded and includes a tracking system to determine if it is effective. When and how will this needed plan be completed to help those who need it. RIP can wait while this plan is put together. 6. And in the weeds, waiting for the evictions, the demolitions, and the displacements, will be the major beneficiaries of RIP, the investors, the lenders, the developers/homebuilders-they cannot wait, but you can, take the time to deal with this perfect storm. These current circumstances, including the pandemic, require that you delay and rethink the effect of RIP on our community.

190093

Dean Gisvold 2225 NE 15th Ave Portland, OR 97212 PS-have to note the June 1 headline in the W Post-"To stay or to go: Pandemic provides push for city dwellers to relocate"

Testimony is presented without formatting.

dean and susan gisvold

#143994 | June 2, 2020

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

Mayor and Commissioners Regarding the amendments under consideration, I wish to comment on two of them. First, the so called Deeper Affordability Bonus. I am opposed to this amendment because it will not work, and further erodes single family areas. RIP started life as an effort to deal with demolitions. Then it morphed to be a middle income housing program, which was also touted as a solution to the City's affordable housing crisis. Some residents thought this meant that RIP would also be part of the solutions to the homeless issues. But not so much. Comments, and studies showed this not to be true. Now the plan is to allow 2 more units, up to six units on a 50 by 100 lot, if 50% of those units are affordable to those folks in the 60% or under MFI category. This looks like RIP combined with inclusionary zoning, which did not go well. Developers do not like inclusionary zoning. Apparently not for profit developers do, but where are the positive examples of such projects. This category of housing requires supplemental services to deal with numerous issues, which the council knows too well. How will those services be provided and who will pay for them? This amendment should be dead on arrival. Second, I support the Historic Resource Demolition Disincentive Amendment. This amendment will make RIP consistent BHD. And it strengthens protections for resources in Conservation Districts. No reason to reward a developer to knock down an historic resource. This amendment actually makes some sense. Dean Gisvold 2225 NE 15th Ave Portland, OR 97212 Type or paste your testimony in this box...

Testimony is presented without formatting.

Tom Christ

#143995 | June 2, 2020

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

Dear Commissioners: I wrote you on April 25 to urge you to support the Residential Infill Project, because it will help to alleviate the dire shortage of affordable housing in Portland and, perhaps more importantly, help to alleviate the lingering problem of racial segregation in the city, which is caused in no small part by exclusionary land-use policies and practices, like single-family zoning. I'm writing now to urge you to reject proposed amendments to the RIP that would, for all practical purposes, allow any neighborhood to opt out of the law – without the approval of the City Council, or even the consent of most of the neighborhood's residents. I'm speaking, of course, about the proposal to limit the development options on any site where an historic resource was demolished in the preceding ten years. On those sites, unlike others, triplexes, fourplexes, additional ADUs, and certain other types of dwellings would not be allowed, under this amendment. If the RIP were to pass with this amendment, the people who oppose infill and redevelopment, or who oppose any new housing, at least in their backyards, would rush to turn their neighborhoods into historic districts. It's easy enough to do. To get your neighborhood listed on the National Register of Historic Places and thus turn neighborhood houses into historic resources, you don't need the City Council's approval. You don't need the approval of your affected neighbors, or even a majority of them. In fact, you don't need the approval of any of them. You just need to keep a majority of them from disapproving the plan. And disapproval can only be expressed by filing a signed and notarized letter, an onerous burden that, of course, discourages many from even trying. It doesn't matter whether there are more letters objecting to the district than supporting it – even many more. If the notarized objections don't reach fifty-percent-plus-one of all eligible homeowners, the district will be listed. It's an unfair and undemocratic process that should not have local land-use consequences and, in particular, should not be allowed to exempt a neighborhood from the RIP's requirements, even in part. The RIP, if passed, should apply everywhere except where Portland voters, or you, their elected representatives on the City Council, decide that it shouldn't. No neighborhood should be able to opt out on the say-so of its residents, let alone a minority of them. Please don't overlook the fact that the neighborhoods that are already in historic districts are some of our wealthiest and whitest – the ones most in need of the diversification that the RIP would foster, as explained in my prior letter. Irvington and Ladd's Addition are HDs. Laurelhurst just became one, and Eastmoreland is trying to follow suit, against the wishes of most of the homeowners, myself included, who voted it down in an election that the district proponents decided to ignore. NIMBYs in other neighborhoods that are wealthier and whiter than the city as a whole are likewise planning to seek historic district designation. This amendment,

if passed, will spur them on, and many others, too. Please reject it. At the very least, please restore some democracy to the process, by amending the amendment to provide that the only historic resources to which these special rules would apply are those that were created by the City Council, not those created through the National Register process. Thank you.

Testimony is presented without formatting.

Jonathan Greenwood

#143996 | June 2, 2020

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

I just want to say I support Portland: Neighbors Welcome's stance: "We support the technical amendments 1 through 4 and amendment 6, the crucial "deeper affordability" bonus to allow below-market family-size homes on any lot in the city. We oppose amendment 7. This amendment would ban triplexes, fourplexes, and regulated affordable 5- and 6-plexes in certain affluent neighborhoods. In addition, amendment 7 would do nothing to incentivize internal conversions or the retention of historic buildings. More broadly, we call your attention to the fact that as exciting as this project is, as much as it will help create a better city for future generations, it is neither adequate to the full needs of future Portlanders nor a solution to the immediate crises many Portlanders face today. More action is needed soon: a citywide anti-displacement strategy; new funding to fight homelessness and build deeply affordable homes; zoning reforms to bring larger mixed-income buildings to currently exclusive areas near jobs and transit. Pass this plan, but do not rest on it."

Thank you, Jonathan Greenwood

Testimony is presented without formatting.

Ethan Seltzer

#143997 | June 2, 2020

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

To the members of the Portland City Council: Thanks for this opportunity to testify on the Residential Infill Project (RIP). The RIP is one of the most important planning decisions the City will be making in my entire time in Portland, now going back over 40 years. While there might have been a time when zoning according to "family" or as a means for keeping noxious uses out of residential areas may have made sense, what we see today is a zoning system that only perpetuates the segregation and exclusion we've come to understand is at the root of our current zoning code. Simply put, zoning primarily serves to keep people apart, not to create great and welcoming communities. It's time to recognize that restricting new residential growth to a fraction of the City's land area is not useful, inclusive, or humane. Rather, it's past time to expect that every neighborhood offer the opportunity for broad range of housing options to be found there. Further, it's also important to recognize that density and overcrowding are not the same things. We shouldn't fear or demonize density. We should work to ensure that no household in our city is subject to overcrowding, and that means adding to the housing stock in every neighborhood with a range of housing types. There is simply no excuse for putting off the day when, once again, we can build neighborhoods just like the ones we built 100 years ago and that are now both revered by the public and illegal according to the zoning. I have two main points that I want to leave you with. First, I am in opposition to Amendment Package 7. As written, it could apply the term "contributing structure" to an entire district. This only furthers the perversion with which historic districts have been created throughout the city, mostly, in my view, with dubious links to history and too little specificity regarding the rationale for historic significance. My own neighborhood, Alameda, were it to be proposed for historic status, would, like all of the other historic districts in the city have to be recognized for it's legacy of overt racial and ethnic segregation and exclusion, the true historic legacy of these neighborhoods. Amendment package 7 simply creates another barrier to real housing production and reform due to its sweeping language and invitation for imprecise application. If the City wants to create a disincentive for demolishing historic structures, then it should require that each of those structures has a specific listing pertaining to its historic worth and significance. Please note that "old" is not good enough. Unfortunately, Amendment package 7 only perpetuates the use of historic preservation as a means for preventing needed change, and with little historic justification. Second, I urge you to act. We have been working on the RIP for too long. It has been put off, despite excellent staff work and careful public comment, largely due to a lack willingness to bring this process to a successful conclusion, one that is deserved and deeply needed. Every crisis

you have asked us to face today--climate, housing, houselessness, sustainability, equity, etc.--runs through and with the RIP. Please move this process forward and lets get on with creating a better city for all of us. Thanks!

Testimony is presented without formatting.

Megan Van Woodward

#143998 | June 2, 2020

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

Hello City Council members, I am a future constituent of yours. Right now my husband, child and I are living with family and saving as much as possible with the intention of becoming home-owning citizens of Portland in the near future. The more housing the city allows to be built, the more moderately housing prices will rise, and the sooner we - and others like us - can become life-long citizens of this beautiful city. PLEASE LEGALIZE FOURPLEXES! They are a great example of "missing middle" housing, which allows density to develop gently without destroying the existing streetscape, the same way as was done all over the city before the 1950s. This development pattern helped to create the gorgeous, mixed-income place that we hope to live in soon. Middle-class families can and will be overjoyed to live in these houses. Please crack open the door and let us in!! Thank you, Megan

Testimony is presented without formatting.

Emily Kemper

#143999 | June 2, 2020

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

Please pass the RIP, once and for all. This has gone on since 2015 and too many Portlanders have suffered during that time from our lack of sufficient housing choices and inventory. I support the technical amendments 1 through 4, and especially amendment 6, for the deeper affordability bonus. I oppose amendment 7. Thank you for your consideration.

Testimony is presented without formatting.

David Robboy

#144000 | June 2, 2020

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

Residential infill is long overdue in Portland and I urge the city council to pass amendments 1 - 4, and especially amendment 6, the deeper affordability bonus. I oppose amendment 7, which basically exempts some affluent neighborhoods from greater density, and does not incentivize internal conversions or historic building preservation. Portland recently voted to tax ourselves to help homeless people, which is inadequate to actually help them, and does nothing to attack the root causes of homelessness. The residential infill project finally offers us a chance to start preventing homelessness by providing more housing, and I hope the city council will pass it in the strongest possible form.

Testimony is presented without formatting.



Portland Small Developer Alliance

June 1, 2020

Honorable Mayor and Commissioners:

I'm Mary Vogel, Founding Principal of PlanGreen and co-founder of Portland Small Developer Alliance. As I watched on TV over the weekend, then walked down SW Main St. to the Justice Center this morning, I saw evidence of the Black community's deep frustration with the way they have been and are being treated in Portland and throughout America. It was in the graffiti that was all over our public buildings and the cardboard signs that could still be found on the street and sidewalk. I hope the amendments before you—as well as RIP itself—can play a small role in allaying some of that frustration.

Even earlier this morning, thanks to Sandra Sorenson writing in The Skanner <https://www.theskanner.com/news/northwest/28791-hope-for-historical-preservation-in-portland-s-black-neighborhoods>, I learned more about the history of Denyse McGriff's testimony on the importance of Amendment 7 to the Black community. As I came to better understand what the National Register of Historic Places Multiple Property Documentation (MPD) form was about, I thought to myself that such a process should be used for all historic preservation projects going forward because it shifts the focus to the preservation of **cultural heritage sites**—not largely to architectural design.

We wholeheartedly agree with the GOAL of Amendment 7--protecting historic resources. We do question whether the proposed approach sends the wrong message: **You can demolish a historic landmark or contributing structure as long as you're only seeking to replace it with a single family home or a duplex?** This may be a disincentive to some, but a welcome invitation to a wealthier set.

However, in consideration of Denyse McGriff's Map App testimony <https://www.portlandmaps.com/bps/testimony/item.cfm#search=Denyse&itemID=103525> about unequal impact of RIP on African American historic resources, **we DO NOT suggest eliminating it.** Could Amendment 7 instead apply

- only to those **historic resources that have been through the MPD process OR**
- only to the area that was part of the **1993 Albina Plan?**

This way wealthy neighborhoods with historic designations won't be able to weasel their way out of providing more housing choice—as those testifying against Amendment 7 fear.

If the goal is to **encourage adaptive re-use**--as McGriff and others from Architectural Heritage Foundation insist—then City Council needs to acknowledge the complexity of such re-use projects and provide **building code changes** and **appropriate incentives** to ensure their success. In Portland Small Developer Alliance Feb. 13 Map App testimony <https://www.portlandmaps.com/bps/testimony/item.cfm#search=Garlyn&itemID=93340>,

Garlynn Woodsong had in-depth suggestions for regulatory changes and we strongly encourage you to consider that testimony. We covered the following areas:

- Building Code Classification
- Fire Sprinkler Requirement
- Fire Sprinkler Classification
- Elevator
- Greywater
- Openings allowed on walls within a certain distance of other buildings
- Sound Transmission Code
- Insulation Code

There are other problems in **Oregon Structural Specialty Code** that make it very difficult and expensive to do internal conversions of existing homes. Portland's city code largely obstructs adaptive re-use of large single-family homes for **group living** as well. We are aware that city staff is already working to change some of these regulations.

Continued work on such changes will make it economically feasible to adapt and re-use historic homes and to do so at reduced cost without any sacrifices to safety or health. We hope we can work with our allies to support the City's efforts in **the building code change process** as soon as you pass RIP!

Regarding the pandemic, the scientists who study how diseases emerge say that Climate change is making outbreaks of disease more common and more dangerous. The young people in Sunrise Movement PDX, have made the case so well that **housing policy is climate policy**. We urge you to act like climate change is an equal emergency to coronavirus—AND PASS RIP NOW!

Mary Vogel, CNU-A

P.S. We understand that Amendment 7 is a placeholder for new regulations to be proposed in the Historic Resources Code Project that would give properties in Conservation Districts greater protection through board review. We applaud that and hope that HRCP will be passed and implemented far more quickly than RIP.

Mary Vogel

#144001 | June 2, 2020

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

We largely address historic resources conservation and adaptive re-use in this testimony.

Testimony is presented without formatting.

June 2, 2020

The Honorable Mayor, Ted Wheeler
 Commissioner Amanda Fritz
 Commissioner Jo Ann Hardesty
 Commissioner Chloe Eudaly

RE: Residential Infill Project 2020

Dear Honorable Mayor and City Council members,

I have been following and participating with the Residential Infill project as a resident for a few years now. Through all manner of RIP meetings, commissions, testified on Map App, attended neighborhood associations, numerous open houses, attended Planning Commission meetings (witnessed the 5-4 vote.) And all four years, my mailbox has been stuffed with unsolicited fliers, postcards and letters offering quick cash for my house. I've met proponents and opponents to this project, both sides, and am still not convinced after all this time and your effort, RIP is good for the neighborhoods of the city of Portland, Oregon. I would implore the authors and supporters of the Residential Infill Project to admit that equity is not a goal, when all city policy needs to be sent through that prerequisite. It will not solve a lack diversity. The resistance to this proposal is not NIMBY-ism. Those who have stable houses understand how important it is to create and maintain generational wealth and to deny this in an engineered gentrification of poorer neighborhoods deprives POC the chance for stable housing, to build wealth...equity! All for the benefit of increasing property tax revenue? The proponents of this project recite the historic racist red-lining of the city neighborhoods to justify their own convictions that RIP could repair all that. I purport that it will just happen all over again. An economic red line. High end developers, realtors and high-minded small developers are making our policy decisions with the Bureau of Planning and Sustainability. No vote by any citizens! For the past four years, our neighborhood associations were commandeered by organizations that wrote letters on behalf of tired and trusting neighbors. Spoke for us and not about us. Yes, it only took a couple of tenacious neighborhood associations, and the awesome citizens of the United Neighborhoods for Reform to finally get heard above the well-funded Portland for Everyone. To that, the Home Builder's Association with Tina Kotek and supporters headed for an end run to the state level, HB2001, and well, now The City of Portland is poised to barrel down the trail first in this obliteration of owner-occupied homes within the city of Portland. These low and steady voices have implored you, BPS and the planning commission to examine the outcomes and displacement of your RIP proposal. It is plain and simple, a loss of habitat for people of color, poor, old and disabled (please add here anyone that isn't white, male, 30-50, able to ride a bike to work, doesn't have to drop the kids off, educated and monetarily self-sustaining.) No shade, you know it's true. Tell me, who owns these new infill houses, duplex, triplexes? (now even more density proposed so it "pencils out" or is "game-able" (actual words from a planning commissioner) for the investor/developers + bonus FAR!) Not the occupants. These units will be rented. Not for sale. Only a **percentage** of the building units will be **rent affordable**. An **owned** home provides stability. You'd always be at the mercy of your investment real estate landlords (read: no rent control.) The economic tsunami upon us will test all manner of shelter. Be better, City of Portland! Infill with small affordable homes, condos, town houses **to purchase**. Follow historic neighborhood covenants, aid historic black neighborhoods, provide ADU's. Follow the hard work of the BPS to mold a better form of housing with setbacks, backyards, height limits and tree preservation. Subsidize the citizens of Portland not real estate investors. The equity in a home that you own is still the best wealth investment in this society and it's being denied to most of us. By passing this proposal, you will effectively be drawing a new red line around the city of Portland. Your teachers, nurses, service workers and all our valued front-line

workers *might be* able to rent close in but they could *never afford to buy* the house next door. They will buy a home and invest in their future not here, not Portland. It is past time to take our building policies through the equity lens. There are those moments where planning policies and leadership can bring their citizens forward together or accelerate this cultural and economic divide. It's your watch. You are good people and this can only be great if we are all together.

Respectfully,
Elizabeth Moore

Elizabeth Moore

#144002 | June 2, 2020

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

Please DO NOT pass RIP

Testimony is presented without formatting.

Nancy Hedrick

#144003 | June 2, 2020

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

I am not comfortable with the current RIP draft plan. It seems like another incentive for massive demolitions and loss of tree canopy, with current homes being in the shadows with no options of gardens. The added 5' height in the latest RIP draft should be re-considered. 6 units is too many for the R2.5 and R5 lots. Middle housing of a lower number is called for and it should be limited to areas around transit. We should start with the transit-center development option first, and then go from there later on if more is needed. I am not comfortable with the city ridding itself of so many parking spaces. I am a semi-disabled senior who cannot do certain things without my car. I see the current RIP plan as too pro-development and oriented to small units which are not necessarily family-friendly. Earlier drafts were to have new density that would be somewhat compatible with neighborhood housing, but successive drafts get further away from that goal.

Testimony is presented without formatting.

Eric Winters

#144004 | June 2, 2020

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

The Laurelhurst neighborhood should be treasured and protected by the City. It is a model neighborhood because of its sense of community. Allowing multiplexing will destroy the look and feel of the neighborhood and slowly erode that sense of community. The RIP will only benefit the developers. These multiplexes will either be rentals which do not add to the sense of community because renters are temporary, or they will sell for far above the amount that the commissioners say these are meant for. All the money will go the developers, and the community will forever be changed. It is NOT an exclusive neighborhood. There are no gates, and ANYONE can purchase a home if they can afford it. I am 52 years old and could finally afford to buy a home here because we saved and chased our dream. We bought here because of Grant HS, a diverse school with opportunities for everyone. Yes there are communities with more expensive homes, that does not make the exclusive, or racist or whatever pejorative some commissioners are using. Solve the down payment problem of home ownership, and you'll find that more young people will be invested in their communities, and create neighborhoods just like Laurelhurst.

Testimony is presented without formatting.

6-3-20
Doug Klotz
1908 SE 35th Pl
Portland OR 97214

Re: Residential Infill Project Amendments
Mayor Wheeler and Commissioners:

I support the Residential Infill Project, but would like to put that support in the context of recent events:

For over a century, Blacks and other People of Color have been discriminated against by our city's institutions, including the Zoning Code. Single-family zoning was designed to keep Blacks and others out of White neighborhoods. That zoning persists today, denying the opportunity to build intergenerational wealth as well as access to jobs. The RIP will be a small step toward changing that, allowing more, and potentially less costly, units in all neighborhoods. (There are many other societal barriers, from policing to education to employment, that also need radical changes.)

The Pandemic has also highlighted housing inequality. Across the world, high density neighborhoods, but with uncrowded homes, are faring well. It is in poorer areas, where multi-generational, multi-family households are crowded into tight quarters, that the virus is more pervasive. Abundant, varied housing, with small but separate units, can help alleviate this. (Competent government helps too!)

Today, as in past years, I am writing in support of the Residential Infill Project. This project will enable construction of smaller, less expensive units in most parts of our city, and supply much needed housing, in all neighborhoods. I support Amendments 1-4, as well as "Deep Affordability" Amendment 6. I oppose Amendment 7. I agree with the testimony of *Portland: Neighbors Welcome*.

Amendment 6, with a Deeper Affordability Bonus, will allow non-profit developers like Habitat for Humanity, Proud Ground, PCRI and others to reduce the amount of subsidy needed per home by building up to 6 units on a residential

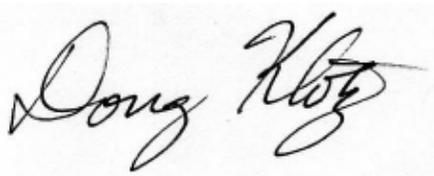
lot, as long as at least half are affordable to rent at 60% of Median family income, or affordable to buy at 80% of MFI. Please adopt amendment 6. While these provisions may not be used widely, they will be very valuable for these non-profits, who will be able to supply housing with less of the subsidies from various sources that they utilize now. The 1.2:1 Floor Area Ratio ensures that units up to 1000 square feet can be built.

I oppose Amendment 7. While well-intentioned, this could have the effect of removing the 3- to- 6-unit options. Structures would still be demolished, but they would be replaced by single houses or duplexes, instead of the less expensive homes that could be built. The \$15,000 fee to seek a Council Review is prohibitive for these smaller projects, and would effectively ban 3,4,5, and 6- unit buildings.

The city should support the Anti-Displacement Task Force with funding, and a speedy implementation of the resulting recommendations. The input of Portland African-American Leadership Forum will be especially valuable.

I urge Council to adopt the Residential Infill Project, with amendments 1-4 and 6, to help right injustices, and continue to work toward equitable, safe, and healthy housing for all in Portland.

Thank you.

A handwritten signature in black ink, appearing to read "Doug Klotz". The signature is written in a cursive, flowing style with some loops and flourishes.

Doug Klotz

#144005 | June 2, 2020

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

I support Residential Infill Project to add needed housing and address injustices. See attached letter.

Testimony is presented without formatting.



City of Portland
Historic Landmarks Commission

190093

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Portland, Oregon 97201
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www.portlandonline.com/bds

June 2, 2020

To: Mayor Wheeler and Portland City Council
Re: Residential Infill Project "Project Amendments for Consideration" May 15, 2020

The Portland Historic Landmarks Commission (PHLC) would like to provide written testimony for consideration during your deliberations on the Residential Infill Project amendments on June 3, 2020.

The commission previously submitted a letter to council outlining specific comments submitted on January 15, 2020. This letter will focus on potential amendments being considered in the documents dated February and March of this year. The commission has only one issue to make note of.

The PHLC would like to voice support for the Historic Resource Demolition Disincentive amendment that was discussed at City Council on February 12, 2020. We believe this measure will help to ensure that resources are protected, especially in vulnerable conservation districts. We agree that the policy should be aligned with the Better Housing by Design project. Our request is that the amendment be accepted as written.

We are very appreciative of the hard work by the Bureau of Planning and Sustainability and all involved. We are enthusiastic about and very supportive of many aspects of it. We feel that density can and should be increased everywhere in Portland, including in historic districts, using policies that respect the historic fabric of the City.

Sincerely,

Handwritten signature of Kristen Minor in black ink.

Kristen Minor
Chair

Handwritten signature of Maya Foty in black ink.

Maya Foty
Vice Chair

Handwritten signature of Ernestina Fuenmayor in black ink.

Ernestina Fuenmayor

Handwritten signature of Elisabeth A. Mahoney in black ink.

Elisabeth A. Mahoney

Handwritten signature of Matthew Roman in black ink.

Matthew Roman

Handwritten signature of Andrew Smith in blue ink.

Andrew Smith

Handwritten signature of Derek Spears in green ink.

Derek Spears

cc
Morgan Tracy, BPS
Hillary Adam, BDS
Brandon Spencer-Hartle, BPS

Kristen Minor

#144039 | June 2, 2020

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

Letter from PHLC attached.

Testimony is presented without formatting.

From: [Council Clerk – Testimony](#)
To: [Commissioner Hardesty](#); [Eudaly, Chloe](#); [Fritz, Amanda](#); [Wheeler, Ted](#)
Cc: [BPS Residential Infill](#); [King, Lauren](#); [Rees, Linly](#); [Aiten, Herico](#); [Bradley, Derek](#); [Carrillo, Yesenia](#); [Eale, Ocean](#); [Pierce, Meeseon Kwon](#); [Washington, Mustafa](#); [Williams, Tia](#)
Subject: Testimony for RIP: FW: RIP Amendments Nos 6 and 7
Date: Tuesday, June 2, 2020 2:11:30 PM

From: Dean P. Gisvold <deang@mcewengisvold.com>
Sent: Tuesday, June 2, 2020 12:19 PM
To: Council Clerk – Testimony <CCTestimony@portlandoregon.gov>
Cc: Wheeler, Mayor <MayorWheeler@portlandoregon.gov>; Commissioner Fritz <amanda@portlandoregon.gov>; Commissioner Hardesty <joann@portlandoregon.gov>; Commissioner Eudaly <chloe@portlandoregon.gov>
Subject: RIP Amendments Nos 6 and 7

Mayor and Commissioners

Regarding the amendments under consideration, I wish to comment on two of them.

First, the so called Deeper Affordability Bonus. **I am opposed to this amendment because it will not work, and further erodes single family areas.** RIP started life as an effort to deal with demolitions. Then it morphed to be a middle income housing program, which was also touted as a solution to the City's affordable housing crisis. Some residents thought this meant that RIP would also be part of the solutions to the homeless issues. But not so much. Comments, and studies showed this not to be true. Now the plan is to allow 2 more units, up to six units on a 50 by 100 lot, if 50% of those units are affordable to those folks in the 60% or under MFI category. This looks like RIP combined with inclusionary zoning, which did not go well. Developers do not like inclusionary zoning. Apparently not for profit developers do, but where are the positive examples of such projects. This category of housing requires supplemental services to deal with numerous issues, which the council knows too well. How will those services be provided and who will pay for them? This amendment should be dead on arrival.

Second, **I support the Historic Resource Demolition Disincentive Amendment.** This amendment will make RIP consistent BHD. And it strengthens protections for resources in Conservation Districts. No reason to reward a developer to knock down an historic resource. This amendment actually makes some sense.

Dean Gisvold
2225 NE 15th Ave
Portland, OR 97212

Dean P. Gisvold | Attorney at Law | Senior Partner

McEWEN GISVOLD LLP - EST. 1886

1600 Standard Plaza, 1100 SW Sixth Avenue, Portland, Oregon 97204

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**This message may contain confidential communications and/or privileged information.
If you have received it in error, please delete it and notify the sender.**

Dean Gisvold

#144046 | June 2, 2020

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

Letter attached

Testimony is presented without formatting.



June 2, 2019

RE: Support the Residential Infill Project with the Deeper Affordability Bonus

Mayor Wheeler and City Commissioners,

The Welcome Home Coalition represents 65 organizations throughout the Portland metro region that uses its collective resources to advance policies that move our community towards our vision of each of our neighbors having an affordable place to call home. Our membership consists of BIPOC-led community organizations, homelessness service providers, affordable housing developers, and many more. We are writing in support of the goals of the Residential Infill Project (RIP), and specifically the Deeper Affordability Bonus spelled out in the amendments you are considering.

We know that even with the successes of the City's affordable housing bond, and Metro's affordable housing bond now coming on line, our region will still have a significant deficit of affordable homes. By making the development of affordable units more viable, the Deeper Affordability Bonus serves as a critical tool to ensure our City is one where each of our neighbors can afford to live. It also is a critical component of a broader anti-displacement strategy. We urge your support of RIP that includes the Deeper Affordability Bonus.

We also urge you to not stop with RIP. It is a project worthy of your support, but too many Portlanders are bearing the brunt of the housing crisis today. Portland needs a more comprehensive and resourced anti-displacement strategy led by directly impacted communities. Additionally, the City should continue to insist that Trimet improve upon its Transit Oriented Development guidelines to be more inclusive of affordable housing development.

Thank you to the Council for your ongoing prioritization of housing in our community. We believe the passage of RIP that includes the Deeper Affordability Bonus will be a critical step forward towards addressing the housing needs of so many of our neighbors.

Sincerely,

A handwritten signature in black ink that reads 'Tyler Mac Innis'.

Tyler Mac Innis, Director

Tyler MacInnis

#144047 | June 2, 2020

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

Letter attached.

Testimony is presented without formatting.



John Sandie

#144058 | June 2, 2020

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

The present RIP proposal has wandered so far astray from its original goal to regulate new infill to better mesh with existing surroundings in size and character, it's unrecognizable and has become an antithesis of the initial intent. Besides not following the guidelines laid out in the City's Comprehensive Plan, the "one size fits all situations" mentality can do irreparable harm to many neighborhoods. As an example: The other day I meet a neighbor who had moved into their house less than a year ago, and had jumped right in to become active in the local Friends of Wilshire Park fund raising efforts to update and replace worn out playground equipment. When I inquired about where she lived, she responded, "I live on 35th Place, just a couple houses down from the Death Star House". Two things are sad about this exchange: 1) Not a real positive community visual reference for new residents; 2) I and most other neighbors knew exactly which house she used as landmark. This house is a relatively new, approx. 4000 sq-ft single family home; about same size as proposed 3-4 unit, affordability bonus option. The one, small saving grace of the Death Star House was that, due to the drive under garage, it closely matched the existing setbacks on abutting properties. When existing setbacks for a block are between 20 -25 feet as on many blocks within Portland; this produces a situation for potential large variation with new development's allowed 10- foot setback. This significant setback variation can form a virtual 35 foot high wall being dropped within the block, vastly curtailing line of sight issues for parents and children up and down sidewalks. All I'm asking for is 5 feet!. When the situation (abutting existing houses have 20' or larger setbacks) warrants, place a 15' minimum setback on new structure. This is a small; but important gesture for new development to have iota of reflection on impact to surrounding environment. The "one size fits all philosophy" fails miserably in this particular instance and needs fixing! ** The attached shows what a 15 ft setback looks like, so imagine a 10 ft setback. If BPS is really concerned about impact on a potential significant tree, Urban Forestry can support a waiver to save it. Please do not let this happen to Portland!

Testimony is presented without formatting.



Portland Small Developer Alliance

June 1, 2020

Honorable Mayor and Commissioners:

I'm Mary Vogel, co-founder with Garlynn Woodson of Portland Small Developer Alliance. As I watched on TV over the weekend, then walked down SW Main St. to the Justice Center this morning, I saw evidence of the Black community's deep frustration with the way they have been and are being treated in Portland and throughout America. It was in the graffiti that was all over our public buildings and the cardboard signs that could still be found on the street and sidewalk. I hope the amendments before you—as well as RIP itself—can play a small role in allaying some of that frustration.

Even earlier this morning, thanks to Sandra Sorenson writing in The Skanner <https://www.theskanner.com/news/northwest/28791-hope-for-historical-preservation-in-portland-s-black-neighborhoods>, I learned more about the history of Denyse McGriff's testimony on the importance of Amendment 7 to the Black community. As I came to better understand what the National Register of Historic Places Multiple Property Documentation (MPD) form was about, I thought to myself that such a process should be used for all historic preservation projects going forward because it shifts the focus to the preservation of **cultural heritage sites**—not largely to architectural design.

We wholeheartedly agree with the GOAL of Amendment 7--protecting historic resources. We do question whether the proposed approach sends the wrong message: **You can demolish a historic landmark or contributing structure as long as you're only seeking to replace it with a single family home or a duplex?** This may be a disincentive to some, but a welcome invitation to a wealthier set.

However, in consideration of Denyse McGriff's Map App testimony (<https://www.portlandmaps.com/bps/testimony/item.cfm#search=Denyse&itemID=103525>) about unequal impact of RIP on African American historic resources, we **DO NOT suggest eliminating it**. Could Amendment 7 instead apply

- only to those **historic resources that have been through the MPD process** OR
- only to the area that was part of the **1993 Albina Plan?**

This way wealthy neighborhoods with historic designations won't be able to weasel their way out of providing more housing choice—as those testifying against Amendment 7 fear.

If the goal is to **encourage adaptive re-use**—as McGriff and others from Architectural Heritage Foundation insist—then City Council needs to acknowledge the complexity of such re-use projects and provide **building code changes** and **appropriate incentives** to ensure their success. In our Feb. 13 Map App testimony (<https://www.portlandmaps.com/bps/testimony/item.cfm#search=Garlyn&itemID=93340>), we

had in-depth suggestions for regulatory changes and we strongly encourage you to consider that testimony. We covered the following areas:

- Building Code Classification
- Fire Sprinkler Requirement
- Fire Sprinkler Classification
- Elevator
- Greywater
- Openings allowed on walls within a certain distance of other buildings
- Sound Transmission Code
- Insulation Code

Such changes—and others that Leon Porter has pointed out in his Map App testimony (will make it economically feasible to adapt and re-use historic homes and to do so at reduced cost without any sacrifices to safety or health. Porter writes:

Amendment Package 7 would do nothing to encourage internal conversions or adaptive re-use of historic resources. The problem is that the Oregon Structural Specialty Code and local permitting requirements make internal conversions of existing homes into smallplexes extremely difficult and expensive—generally more so than building a new structure. Furthermore, Portland's city code largely obstructs adaptive re-use of large single-family homes for group living.

We will be happy to help you start the building code change process as soon as you pass RIP! We're happy to hear that BPS staff are already working on some changes.

Regarding the pandemic, we see the links with climate change that some scientists are making to coronavirus—from increasing air pollution from burning fossil fuels to habitat loss for wild animals. The young people in Sunrise Movement PDX, have made the case so well that *housing policy is climate policy*. We urge you to act like climate change is an equal emergency to coronavirus—AND PASS RIP NOW!

Mary Vogel, CNU-A

P.S. We understand that Amendment 7 is a placeholder for new regulations to be proposed in the Historic Resources Code Project that would give properties in Conservation Districts greater protection through board review. We applaud that and hope that HRCP will be passed and implanted far more quickly than RIP.

Mary Vogel

#144060 | June 2, 2020

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

Letter from Portland Small Developer Alliance attached.

Testimony is presented without formatting.

Paul Runge

#144016 | June 3, 2020

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

City Councilors and Mayor Wheeler, I am writing in support of the Residential Infill Project, including amendments for a deeper affordability option and concurrent efforts to combat displacement. Re-legalizing these housing types will gradually result in a greater variety of housing choices for renters and greater opportunities for homeowners to create revenue streams for themselves. Re-legalization will serve as a concrete step toward dismantling the racist legacy of exclusionary zoning. And re-legalization will facilitate gentle densification and neighborhood evolution, ushering forth opportunities for greener, higher amenity, and more efficient city living. Please vote in favor of RIP. Thank you for considering my perspective, Paul Runge PSU Student SE Portland Resident

Testimony is presented without formatting.

Quail Park Common Area Testimony

Although this testimony is submitted in relation to the upper portion of the Quail Park PUD common property it applies to the entire project that runs from Quail Post Road's intersection with Huber St. to its intersection with Lancaster Road adjacent to Lancaster Place .

The property was approved as planned development in the early 1970s on which 93 dwelling units were to be allowed. This tax parcel contains the majority of the PUDs common property and is where Quail Post Rd., that provides access to all of the originally approved 93 dwellings, intersects with Huber Street.

When the PUD was approved it appears that it was left to discretion of the developer as to what housing type would be developed. The PUDs original HOA documents specifically apply to "residential lots" and "single family dwellings, apartments, townhouses, condominium units and residential units of every kind". In the event the property was mostly developed with several "models" of single family dwellings related to small platted lots (84 total) and a two models of "duplexes" (9) with each dwelling also related to an individually platted lot. As a result of data developed for West Portland Town Center Plan (map on page 11 of the Urban Form Report) shows that in Quail Park most of the lots have much higher FARs than are found in SW single family areas

The Quail Post Rd. is a paved but uncurbed private road of varying width that somewhat problematically serves as the situs of most the HOAs private water system, equally problematically support its private storm sewer system and includes right of ways for some of the public sewers that serve the project and many neighboring uphill properties.

Lacking curbs the private "maintenance" of the paving has resulted in several repavings that have diverted water away from installed storm drains and into at best, drainageways in uncontrolled locations or at worst, onto downhill lots . Correcting these problems has necessitated the creation of ersatz asphalt curbs and often their replacement when any activity, like that of the PWB evaluating the water system, occurs on the road.

In addition it appears the development of the property in a primarily in a single dwelling unit configuration depending on a private street allowed the installation of a private water system in a manner below PWB standards with smaller pipes **and fewer fire hydrants** the fire marshal originally specified should be installed in the original land use approval.

Beyond that over time land use modifications have been allowed to the PUD application that eliminated active transportation connectivity through the project , slight increased the density allowed by the original approval and created additional infrastructure challenges and risks.

List of Transportation (& Watershed Related) Projects

Completed, Planned, Proposed and Conceptual Affecting Markham Neighborhood

Coming from the West -

- a. Pedestrian/Bikeway separate path along Pomona to 53rd (Proposed by LTIC program)*
- b. Potential Town Center Transportation Upgrades to Huber from Capitol Hiway to 35th (BPS-From WPTC Study)*
- c. A "complete" sidewalk and storm water improvement on south side of Huber from Capital to 35th Ave. Product of the 2009 Stimulus Act , when recommended by SWNI Markham supported the West Portland Park proposal Markham forgoing a 26th Ave. sidewalk improvement request.*

On Markham's SW Boundary 35th Ave. to Macara St.

- a. 35th Ave. Restriping for Active Transportation (Gas Tax Money Deferred due SW Bonne's Ferry Bridge rebuild) –Including Huber & 35th Ave. Inter section Improvements*
- b. Planned upgrades for 35th Ave. (TSP) –*
- c. I-5 North Bound Off Ramp at Taylor's Ferry Rd. (ODOT's Tolling Program)*

Internal Improvements Originating on Markham's West Boundary 35th Ave North to South

- a. Planned Upgrades for Taylor Ferry Road (TSP?)*
- b. Ridge Drive/ Wilbard/29th Place/ Ridge Drive/ Stanley Ct. to 26th Ave Green Street (SWIM) –Not as mapped in March 2020 WTCP materials*
- c. SW Huber to SW 25th Ave. Bikeway Improvements to Luradel (SWIM/ Bike Master Plan?)*
- d. Marcara St. to 30th Ave. to Ridge Drive -Safe Routes to Schools Trail (PBOT Trails Program)*

Improvements Internal to SW Markham (35th to Tryon Creek Branch West of 23rd Drive and north of SW Taylor's Ferry Working East from Taylor's Ferry Off Ramp)

- a. SW 29th Ave. (Private) Pine Hill Property Additional Development (BDS)*
- b. Quail Park Public Pedestrian Paths from Quail Post Rd. (private effectively SW 29th) to Ridge Drive (PWB) & SW 30th ROW to SW Lancaster (PWB –BES –BDS)*
- c. Green Street Improvement at SW Quail Post Rd. & SW Huber-BES (replaced an often clogged PBOT storm drain and eliminated a surface flooding problem within Quail Park) (Problem required out ROW QP common area improvement to reestablish PPS school bus stop)*

d. SW 26th Ave. from SW Taylor's Ferry to I-5 Undercrossing (ODOT Barbur Demo Project To PBOT/BES SW Corridor)

e. SW Markham to NE Markham Neighborhood Interconnection Trail between SW 25th & Marigold ROW and SW 23rd Place/ Quinault Ct. area (PBOT-BES Stephens Creek –Tryon Creek Plan)

Conceptual Plans/Proposals for Area –

i.) SW 30th Ave. Over Crossing to SW MAX Green Line Stop at 30th & Barbur (Proposed during SW Corridor Project & WPTC Project (?))

ii.) 25th Ave.(?)/ I-5 Interchange-Replacing SW TFR off ramp and improving Spring Garden on ramp (ODOT/ Raised during SW Corridor Project/ Barbur Concept Plan – Discussed use of Traffic Circles in Interchange Design)

iii.) West side of SW 26th Ave. & SW Marigold Transit Supportive E-Parking & Storm Water Mitigation Structure

On Eastern Boundary of SW Portion of Markam Neighborhood

a. 25th Ave. Pedestrian and Storm water Improvements on 10000 block demonstrates what type of roadway and storm water improvement is needed from Lancaster Rd. to the South Side of Marcara Natural Area (BDS)

b. SW Lancaster Rd. Bikeway and Foley Balmer Natural Area Trail/Bridge Access Improvements (SWIM – Parks –METRO)

External Transportation/Watersheds Project North Side of Southwest Markham Neighborhood Related to I-5 and Barbur Blvd.

a. Removal of through traffic from W. SW Barbur Court to downsize for impermeable surface removal consistent with maintenance needs of adjacent ODOT/BES water quality facility and active transportation access to the 30th Ave. station.

Northeast Markham Projects and Proposals Supportive of SW Corridor Transportation Improvement and RIP Density Enhancements

a. SW Spring Garden Sidewalk from SW 19th to SW Taylor Ferry Rd. (Actually on S. Burlingame side of Spring Garden) also product of 2009 Stimulus Act and support by Markham of a S. Burlingame proposal (similar to the Huber sidewalk)

b. 19th Ave. Green Street – Marigold to SW Taylors Ferry Road –(Stephens- Tryon Creek Basin Plan BES/PBOT)

c. Gravel Street Maintenance Plan – (PBOT Gas Tax Program(?))

d. Upper 19th Ave. Unimproved Street Closures –

e. Vacation SW Freeman between SW 17th & 19th supporting St. Clare's Parking

RIP Amendment Testimony

Presented by John Gibbon – 9822 SW Quail Post Rd.

Markham Neighborhood Assn. Transportation Chair/ Watershed Representative

I am speaking today to support the SWNI request the triplex and fourplex development on existing lots be limited to lots and parcels that have frontage on paved and curbed streets, in fact for reasons explained in Map App comments concerning 10038 Quail Post Rd. I am urging that the development privilege be limited to lots and parcels that directly access such a street.

The opinions presented in this testimony and its associated Map App filings are the solely the author's. They reflect my 40 plus years professional and personal experience primarily working on and living in housing that is now generally described as middle density housing. They also reflect nearly twenty years of engagement with the Markham neighborhood association and its associated coalition SWNI

They should be understood as a general statement of support for the City's RIP effort and West Portland Town Center effort as well as the Region's SW Corridor Plan that will in concert substantially impact the Markham neighborhood. I see (and believe a substantial number of my neighbors see) all these efforts be actions that attempt to rectify our society's and the City's long term failure to equitably provide for all types of tenure for the City's diverse communities in all neighborhoods. RIP can do this by developing more fair zoning and effective land division procedure. But they are also a plea to not make this effort unsafe by failing to adequately coordinate this effort with other City efforts to resolve significant infrastructure problems even now impacting existing residents in our neighborhood.

My experience leaves me with no doubt that in many ways, facilitated by neighborhood associations and coalitions, historic zoning and land division requirements together with market requirements have interfered with projects that would have provided greater housing equity. But as you move ahead with rectifying these inequities I would urge to look carefully at that fact the historic interplay between these factors have often produced existing housing dependent on infrastructure that may put it

During my 45 years of METRO residency and my 40 year professional career as real estate/ land use/ local government/ community association attorney I have often noted this failure in the equitable implementation of Oregon's land use planning system. As someone who intentionally chose to attend what was then Oregon's most diverse undergraduate institution and sought and obtained professional training in the field of natural resources and environmental law I personally I have been especially distressed by this failure often purporting to be justified on the basis of "protecting natural resources" or "preserving the environment or livability". Accordingly I personally believe that the RIP program and its proposed amendments are an appropriate and sadly long delayed policy change, and I believe in my Markham Neighborhood there at least a fragile consensus among engaged neighbors that implementation of the policy in some form is beneficial to the neighborhood and the City.

This testimony is specifically prepared to suggest that RIP, through modification of the amendments before the council in manner that brings them more in accord with the suggested amendments

submitted by SWNI, could, by achieving a more careful coordination with the City's previous transportation and watershed planning in the Markham neighborhood strength that consensus. Carefully coordinating RIP with extant community proposals would avoid working at cross purposes to important infrastructure policies the City has endeavoring to implement and enhance the deliverables sought by the current residents which are in my judgment also vital to safely accommodating the new residents RIP envisions into the neighborhood.

The technical amendments No. 1 before council from staff suggests that any lot or parcel that abuts a City maintained or is on a private that connects to a City maintained street should be allowed triplex or fourplex development. SWNI requests a revival of Amendment to specify the only lots and parcels abutting paved and curbed streets should be allowed to develop in this manner. I can report my believe, based on responses to the SWIM transportation project is there general support in the Markham Neighborhood (generally between SW 35th and SW Spring Garden along Inner Taylors Ferry east to west and I-5 and Marcara Street or Taylors Ferry north to south) I generally support this SWNI proposal.

On behalf on my HOA the Quail Park Association (between the 2900 block of SW Huber and the 2500 block of SW Lancaster) I urge you based on map app testimony covering the Park to consider even more stringent restriction and only grant the status to lots and parcels access from the paved and curbed streets.

SWNI's second proposed amendment shows, not uncontroversially among the coalition neighborhoods, support for general principals embodied in the RIP proposal. They do this by asking the council to consider limiting the effect of amendment 6 to areas along transportation corridors and around identified centers. SWNI's proposes this amendment because it believes that while the density bonus may be entirely appropriate for most of the City where a transportation grid supports urban living, it is not as applicable in the southwest's suburban midtwentieth style areas impacted by geography, has historic transportation and infrastructure choke points. In the Markham neighborhood there has been support for recent wise transportation and environmental planning decisions made with strong bureau effort to work with interested neighbors. The implementation the proposed amendment contained in the staff report, without some method to efficiently and at reasonably avoid the inherent safety risks it will cause in areas with inadequate infrastructure, as suggested by SWNI, will cost the City consistent neighborhood support needed to implement these decisions. In my opinion the SWNI request provides for the "fine tuning" in areas adjacent to 26th Ave., SW Taylor's Ferry Rd., SW 35th Ave., the Ridge Drive Greenway and 25th Ave. that has to date gained Neighborhood support.

The author believes data produced by the West Portland Town Center plan studies offers evidence that a moderate increase in the increase density in areas of Markham ifsupported by increases in active transportation infrastructure and by the retention or careful modification of transit access will enhance the possibility of RIP success.

John Gibbon

#144017 | June 3, 2020

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

This is the property that would be allowed to developed as a fourplex even under the SWNI proposal related to Amendment 5. Because of the infrastructure deficiencies in Quail Park described in the attachment 1 and duplicated in the Map App for the common property adjoining this lot to the west QPA request consider of more restrictive language preventing 3/4 plex development on lots or parcels accessed from uncurbed streets.

Testimony is presented without formatting.

Maggie McGann

#144018 | June 3, 2020

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

Council members, This year has highlighted the inequities in our society, as recent protest and the national conversation surrounding it have spotlighted how deep and pervasive racial inequities are in America, and we have seen what communities have been most effected by the Coronavirus. The residential infill project will not begin to solve these massive structural issues we face. But we can put an end to the exclusionary zoning in Portland, and create rules that will help more people of different incomes live in all parts of the city and have access to the best that Portland has to offer. It is time to pass this zoning change that has been 5 years in the making, and pass it with amendments that allow for bonuses for affordable housing. In my work and advocacy for Habitat for Humanity in Portland, I saw what safe, stable, affordable housing meant to families. I worked side by side building houses with future homeowners and heard them describe how they finally didn't have to move, how they were looking forward to housing with good air quality that would help promote their children's health. Today I am a recent nursing school graduate working on my advanced practice degree in midwifery. I have learned more about the impact of housing on health. One of the biggest takeaways I have learned is that of all the factors that go into affecting our health, social determinants actually comprise up to 70% of our health. We now know that one of greatest determinants of health is our zip code. This is due to many factors, but adopting the new zoning rules is one step towards equity in access to healthy air, parks, groceries, public transportation, public services, schools, etc. As a health care worker and lifelong Portlander, I encourage you to make housing affordability your guiding star and adopt the residential infill package with amendment 4 for the deeper affordability bonus. I urge you to ensure that as we implement this historical change to make all of Portland's neighborhoods more accessible and inclusive, that we truly broaden our outlook and support amendments that especially support housing affordability. Sincerely, Maggie McGann RN

Testimony is presented without formatting.

John Gibbon

#144019 | June 3, 2020

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

Quail ParK Common Area Testimony Although this testimony is submitted in relation to the upper portion of the Quail Park PUD common property it applies to the entire project that runs from Quail Post Road's intersection with Huber St. to its intersection with Lancaster Road adjacent to Lancaster Place . The property was approved as planned development in the early 1970s on which 93 dwelling units were to be allowed. This tax parcel contains the majority of the PUDs common property and is where Quail Post Rd., that provides access to all of the originally approved 93 dwellings, intersects with Huber Street. When the PUD was approved it appears that it was left to discretion of the developer as to what housing type would be developed. The PUDs original HOA documents specifically apply to "residential lots" and "single family dwellings, apartments, townhouses, condominium units and residential units of every kind". In the event the property was mostly developed with several "models" of single family dwellings related to small platted lots (84 total) and a two models of "duplexes" (9) with each dwelling also related to an individually platted lot. As a result of data developed for West Portland Town Center Plan (map on page 11 of the Urban Form Report) shows that in Quail Park most of the lots have much higher FARs than are found in SW single family areas The Quail Post Rd. is a paved but uncurbed private road of varying width that somewhat problematically serves as the situs of most the HOAs private water system, equally problematically support its private storm sewer system and includes right of ways for some of the public sewers that serve the project and many neighboring uphill properties. Lacking curbs the private "maintenance" of the paving has resulted in several repavings that have diverted water away from installed storm drains and into at best, drainageways in uncontrolled locations or at worst, onto downhill lots . Correcting these problems has necessitated the creation of ersatz asphalt curbs and often their replacement when any activity, like that of the PWB evaluating the water system, occurs on the road. In addition it appears the development of the property in a primarily in a single dwelling unit configuration depending on a private street allowed the installation of a private water system in a manner below PWB standards with smaller pipes and fewer fire hydrants the fire marshal originally specified should be installed in the original land use approval. Beyond that over time land use modifications have been allowed to the PUD application that eliminated active transportation connectivity through the project , slight increased the density allowed by the original approval and created additional infrastructure challenges and risks.

Testimony is presented without formatting.

John Gibbon

#144020 | June 3, 2020

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

This is a parcel, not a lot created from Quail Park, common area after the PUD was platted that increased its density above what was allowed by the PUD approval. The construction of the house on the parcel also blocked a "public pedestrian pathway" through Quail Park that was supposed, according to the PUD approval, to lead from 25th Ave. to Ridge Drive. The construction also creates a stormwater anomaly.

Testimony is presented without formatting.

John Gibbon

#144021 | June 3, 2020

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

I am submitting my testimony on behalf of Markham with referenced to this property because this property now owned by Habitat, is one whose development has been supported by the Neighborhood and whose development in a manner consistent with SWNI requested amendments supported in the this testimony would make sense. RIP Amendment Testimony Presented by John Gibbon – 9822 SW Quail Post Rd. Markham Neighborhood Assn. Transportation Chair/ Watershed Representative I am speaking today to support the SWNI request the triplex and fourplex development on existing lots be limited to lots and parcels that have frontage on paved and curbed streets, in fact for reasons explained in Map App comments concerning 10038 Quail Post Rd. I am urging that the development privilege be limited to lots and parcels that directly access such a street. The opinions presented in this testimony and its associated Map App filings are the solely the author's. They reflect my 40 plus years professional and personal experience primarily working on and living in housing that is now generally described as middle density housing. They also reflect nearly twenty years of engagement with the Markham neighborhood association and its associated coalition SWNI They should be understood as a general statement of support for the City's RIP effort and West Portland Town Center effort as well as the Region's SW Corridor Plan that will in concert substantially impact the Markham neighborhood. I see (and believe a substantial number of my neighbors see) all these efforts be actions that attempt to rectify our society's and the City's long term failure to equitably provide for all types of tenure for the City's diverse communities in all neighborhoods. RIP can do this by developing more fair zoning and effective land division procedure. But they are also a plea to not make this effort unsafe by failing to adequately coordinate this effort with other City efforts to resolve significant infrastructure problems even now impacting existing residents in our neighborhood. My experience leaves me with no doubt that in many ways, facilitated by neighborhood associations and coalitions, historic zoning and land division requirements together with market requirements have interfered with projects that would have provided greater housing equity. But as you move ahead with rectifying these inequities I would urge to look carefully at that fact the historic interplay between these factors have often produced existing housing dependent on infrastructure that may put it During my 45 years of METRO residency and my 40 year professional career as real estate/ land use/ local government/ community association attorney I have often noted this failure in the equitable implementation of Oregon's land use planning system. As someone who intentionally chose to attend what was then Oregon's most diverse undergraduate institution and sought and obtained professional training in the field of natural

resources and environmental law I personally I have been especially distressed by this failure often purporting to be justified on the basis of “protecting natural resources” or “preserving the environment or livability”. Accordingly I personally believe that the RIP program and its proposed amendments are an appropriate and sadly long delayed policy change, and I believe in my Markham Neighborhood there at least a fragile consensus among engaged neighbors that implementation of the policy in some form is beneficial to the neighborhood and the City. This testimony is specifically prepared to suggest that RIP, through modification of the amendments before the council in manner that brings them more in accord with the suggested amendments submitted by SWNI, could, by achieving a more careful coordination with the City’s previous transportation and watershed planning in the Markham neighborhood strength that consensus. Carefully coordinating RIP with extant community proposals would avoid working at cross purposes to important infrastructure policies the City has endeavoring to implement and enhance the deliverables sought by the current residents which are in my judgment also vital to safely accommodating the new residents RIP envisions into the neighborhood. The technical amendments No. 1 before council from staff suggests that any lot or parcel that abuts a City maintained or is on a private that connects to a City maintained street should be allowed triplex or fourplex development. SWNI requests a revival of Amendment to specify the only lots and parcels abutting paved and curbed streets should be allowed to develop in this manner. I can report my believe, based on responses to the SWIM transportation project is there general support in the Markham Neighborhood (generally between SW 35th and SW Spring Garden along Inner Taylors Ferry east to west and I-5 and Marcara Street or Taylors Ferry north to south) I generally support this SWNI proposal. On behalf on my HOA the Quail Park Association (between the 2900 block of SW Huber and the 2500 block of SW Lancaster) I urge you based on map app testimony covering the Park to consider even more stringent restriction and only grant the status to lots and parcels access from the paved and curbed streets. SWNI’s second proposed amendment shows, not uncontroversially among the coalition neighborhoods, support for general principals embodied in the RIP proposal. They do this by asking the council to consider limiting the effect of amendment 6 to areas along transportation corridors and around identified centers. SWNI’s proposes this amendment because it believes that while the density bonus may be entirely appropriate for most of the City where a transportation grid supports urban living, it is not as applicable in the southwest’s suburban midtwentieth style areas impacted by geography, has historic transportation and infrastructure choke points. In the Markham neighborhood there has been support for recent wise transportation and environmental planning decisions made with strong bureau effort to work with interested neighbors. The implementation the proposed amendment contained in the staff report, without some method to efficiently and at reasonably avoid the inherent safety risks it will cause in areas with inadequate infrastructure, as suggested by SWNI, will cost the City consistent neighborhood support needed to implement these decisions. In my opinion the SWNI request provides for the “fine tuning” in areas adjacent to 26th Ave., SW Taylor’s Ferry Rd., SW 35th Ave., the Ridge Drive Greenway and 25th Ave. that has to date gained Neighborhood support. The author believes data produced by the West Portland Town Center plan studies offers evidence that a moderate increase in the increase density in areas of Markham if supported by increases in

active transportation infrastructure and by the retention or careful modification of transit access will enhance the possibility of RIP success.

Testimony is presented without formatting.

Jonathan Konkol

#144022 | June 3, 2020

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

I am writing in support of the historic preservation amendment to the Residential Infill Project that is currently up for consideration. Our historic buildings are a non-renewable resource. They also represent the best-loved fabric of our city's built environment. We must be stewards of the resources we have, while ensuring the ability to build what we need around them. Opponents of this amendment have mischaracterized preservation as a covert attempt to discriminate. This is neither fair, honest or accurate. The truth is that most citizens recognize that we need significantly more housing in Portland, but have legitimate concerns about the destruction of what we love, and its replacement by ugly, parasitic development that detracts from its surroundings rather than enhances them. Framing the issue as a choice between these valid concerns is a false dichotomy, and if we use a little creativity and wisdom, we can do much better! As the Alphet District's standards make abundantly clear, we CAN protect historic resources while creating new, diverse, high-density urban fabric that is compatible with its surroundings and even enhances them. The implementation policies can be developed in the next round of legislation, or RIP II, as it is being called. In the meantime, we must act to safeguard the non-renewable resource of historic urban fabric. While the amendment, as written, could use some improvement, it is a baseline to ensure good stewardship until we can craft policies similar to those in the Alphet District to move forward with growth that is compatible and improves our overall quality of life. Jonathan Konkol, AICP

Testimony is presented without formatting.

Stefan Spielman

#144023 | June 3, 2020

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

I am strongly in support of the adoption of the RIP. This would help reverse Portland's worrying trend of increasing cost of living. I've lived in Portland for most of my life and have watched it change, sometimes for the better, sometimes for the worst. One major area it things have become much worse is affordability. Rent and the price of a first home have increased dramatically, driving people with lower income further from the city center. This increases traffic, pollution and lost time in commuting, as well as systematically destroying the community associated with specific neighborhoods. I also support the proposed amendments 1-4 and 6. 7 I find difficult to understand how much it will prevent the missing middle in certain historic neighborhoods. Overall this is what Portland needs to incentivize the further creation of affordable housing and increase the density and livability of the city.

Testimony is presented without formatting.

June 3, 2020

City of Portland
City Council
1900 SW 4th Street
Portland, OR 97201

RE: Woodstock Land Use Committee Comments on the Draft Amendments for the Residential Infill Project (RIP)

Dear City Commissioners:

On behalf of the Woodstock Neighborhood Association Land Use Committee (WNA LUC), we are submitting the following comments on the draft amendments to the RIP dated May 15, 2020. While we appreciate the effort and work product delivered by City of Portland RIP Staffers, we would like to offer the following input based on what we see on the ground in our Woodstock community.

As we have experienced with recent development proposals along the Woodstock Corridor, in lieu of FAR bonuses or height bonuses that may apply under the proposed amendments, applicants have achieved increased densities through height adjustments. As provided under previous WNA LUC letters submitted to the City and the Bureau of Development Services, we opposed and appealed the requested height adjustment on the grounds that the increased height adjustment submittal did not adequately address impacts to adjacent single-family residences and that increased height allowance would add additional units that would put further strain on the already substandard transportation infrastructure in the area (see the unimproved roadways summary provided in response below on page 3). Also, based on floor area plans, the applicant was proposing to achieve the affordability requirement by designating the 4 and 3-bedroom units as the affordable units, thereby achieving the requirement with less units and also creating tiny interior bedrooms without any windows within these units. We felt the unit layout and provision of affordable units to be substandard when compared to the other studio, 1-bedroom and 2-bedroom units. As such, our response to the RIP amendments reflects our concerns based on recent experience in the neighborhood.

Also, it should be noted that as initially drafted, the residential infill project was formed based on neighborhoods' and residents' concerns with new construction being built to minimum setbacks and maximum FAR, generally out of context with adjacent houses and the surrounding neighborhood. These "McMansions" and associated demolition of the existing housing inventory was the focus of the RIP. Over the course of the RIP progression over the last 2-3 years and state mandated single-family zoning reform, the resultant RIP before us today and drafted in this amended code language doesn't really reflect the true intent of the original vision. Furthermore, density was to occur along the commercial corridor with zoning and transit access to support increased density, a plan supported by the Woodstock LUC. We understand that different political and economic pressures have been at play, but wanted to note that change in RIP intent.

The proposed technical changes to the Zoning Code Amendments are provided below, separated by the proposed amendment package number i.e. Amendments Package #1-7, followed by City-provided commentary on the amended code provision, followed by the proposed amended code language,

ending with a WNA LUC response provided below the amended code language. Note that the City commentary and proposed amended code sections are shown in italics, highlights, and underlines, while the WNA LUC response is provided in standard 11 point Calibri font.

Amendments Package #1- Technical Amendments

33.110.265.E.3 Visitability—COMMENTARY

Access to housing for people of all ages and abilities is an important policy objective in the 2035 Comprehensive Plan but current Building Code requirements for “accessible” housing only apply to buildings with 5 or more dwelling units. This provision requires that one unit in a triplex or fourplex be visitable. Type C visitable units are not included in the Oregon Structural Specialty Code, but are detailed in International Code Council (ICC) standards.

To meet this requirement, units will need at least 200 square feet of living area on the same level as the unit entrance and must meet Type C standards that require:

- *No step, barrier free access to the unit (maximum slope of 1:20 or 1:12).*
- *A bathroom with a sink and toilet (with wall reinforcement for grab bars).*
- *Doorway clearances of 31¾ inches.*
- *Lighting controls at an accessible level (no higher than 4 feet).*

Using references to ICC code standards helps facilitate implementation, as it allows BDS building code staff – already familiar with such standards – to use their expertise to review proposals. This is also consistent with the visitability bonus option requirements in the multi-dwelling zones.

33.110.265.E.3 Visitability—PROPOSED AMENDED CODE LANGUAGE

*E. **Triplices and fourplexes.** Triplices and fourplexes that meet the following standards are allowed on interior and corner lots in the R7 through R2.5 zones. **Triplices and fourplexes are prohibited on lots that abut a street that has not been accepted for maintenance by the City of Portland, or the State of Oregon in the case of state highways, and are prohibited on lots that abut a private street that connects to a street or highway that has not been accepted for maintenance by the City or State.** See Title 17.42, Property Owner Responsibility for Streets. Payment in lieu of street improvements does not satisfy this requirement.*

- 1. **Density.** Up to a maximum of four dwelling units are allowed.*
- 2. **Minimum lot area.** Lots for triplices and fourplexes must meet the minimum lot area requirement shown in Table 110-7. Adjustments are prohibited.*

*Table 110-7
Triplex and Fourplex Minimum Lot Area Standard*

<i>Zone</i>	<i>Minimum Lot Area</i>
<i>R7</i>	<i>5,000 sq. ft.</i>
<i>R5</i>	<i>4,500 sq. ft.</i>
<i>R2.5</i>	<i>3,200 sq. ft.</i>

- 3. **Visitability.***
 - a. **Purpose.** The visitability standard ensures that a baseline of accessible features is provided to accommodate people living in or visiting the residence regardless of age or ability. The standards:*

- Promote a diverse supply of more physically accessible housing;
- Allow people of all ages and abilities to easily enter and visit the residence;
- Foster community interaction by reducing barriers that can lead to social isolation; and
- Enhance public safety for all residents and visitors.

b. *Visitability unit standard. Unless exempted by Subparagraph E.3.c., at least one dwelling unit on the lot must meet the requirements for Type C visitable units in ICC A117.1 (2009 Edition) and must have at least 200 square feet of living area on the same floor as the main entrance. The property owner must execute a covenant with the City that meets the requirements of Section 33.700.060 and ensures that the features required by the Type C standards are retained for the life of the dwelling unit.*

c. *Exemptions. The following are exempt from Subparagraph E.3.b:*

- (1) *Lots with an average slope of 20 percent or greater;*
- (2) *Lots where there is more than a 3-foot rise between the highest elevation along the street lot line and the lowest grade measured at the front setback.*
- (3) *Conversion of an existing residential structure to a triplex or fourplex.*

Response: The WNA LUC endorses the proposed amended code language as it relates to visitability and access to housing for people of all ages and abilities. The WNA LUC is a big proponent of creating neighborhoods that allow for aging in place and providing adequate housing inventory for aging residents. Furthermore, the WNA LUC supports the code language prohibiting triplexes and fourplexes on lots that abut a street that has not been accepted for maintenance by the City of Portland. More than 8% of roadways within the Woodstock Neighborhood are unimproved roadways in need of paving, curbs, sidewalks, and landscape strips. There is an even larger percentage (20%) of unimproved roadways within a quarter mile of Woodstock Boulevard and the commercial corridor. This amended code would help to rectify our existing network of unimproved roadways.

33.205.020.B.2 – COMMENTARY

In the R7 – R2.5 zone, a larger lot size is required for the third unit and the lot must front on a street that has been accepted for maintenance (consistent with the standards for triplexes – 33.110.265.E)

Additionally, to avoid potential conflicts with the building code, only one ADU is allowed within a house and an ADU added to a duplex must be detached. Three units with one structure must be permitted as a triplex under the building code.

33.205.020.B.2 – PROPOSED AMENDED CODE LANGUAGE

B. R7 through R2.5.

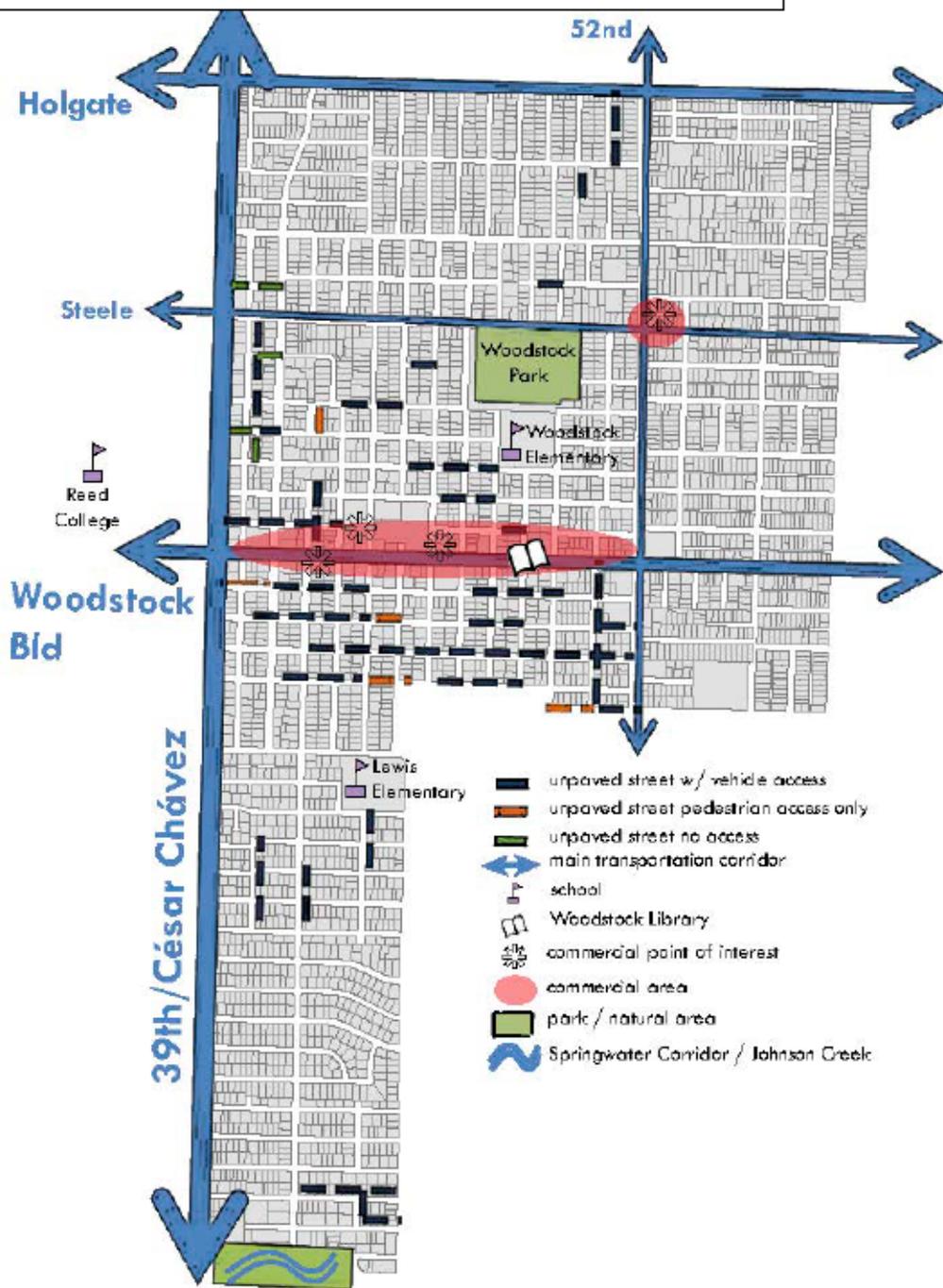
1. *One accessory dwelling unit is allowed on a site with a house, attached house or manufactured home in the R7 through R2.5 zones when the lot complies with Section 33.110.202, Development on Lots and Lots of Record.*
2. *Up to two accessory dwelling units are allowed on a site with a house, attached house or manufactured home in the R7 through R2.5 zones when the lot meets the minimum lot area requirement stated in Table 205-1. Two accessory dwelling units are prohibited on lots that do not abut a street that has been accepted for maintenance by the City of Portland, or the State of Oregon in the case of state highways, and are prohibited on lots that abut a private street that connects to a street or highway that has not been accepted for maintenance by the City or State.*

See Title 17.42, Property Owner Responsibility for Streets. Payment in lieu of street improvements does not satisfy this requirement. If there are two accessory dwelling units on the site, only one may be attached to or within the primary structure.

3. *One accessory dwelling unit is allowed on a site with a duplex in the R7 through R2.5 zones when the lot meets the minimum lot area requirements stated in Table 205-1. An accessory dwelling unit is prohibited on lots that do not abut a street that has been accepted for maintenance by the City of Portland, or the State of Oregon in the case of state highways, or is prohibited on lots that abut a private street that connects to a street or highway that has not been accepted for maintenance by the City or State. See Title 17.42, Property Owner Responsibility for Streets. Payment in lieu of street improvements does not satisfy this requirement. The accessory dwelling unit must be detached.*

Response: The WNA LUC endorses the proposed amended code language as it relates to development proposals on lots that abut a street that have been accepted for maintenance by the City of Portland. More than 8% of roadways (see Figure 1 below) within the Woodstock Neighborhood are unimproved roadways in need of paving, curbs, sidewalks, landscape strips, etc that are generally required when new construction is initiated. This is not always the case within the City of Portland, where ADU additions and single-family renovations or new construction have not triggered the requirement for frontage improvements. This is especially prevalent in Woodstock and only becoming more critical with larger proposed projects slated for construction. There are more than 300 units approved or in permitting process within the Woodstock Neighborhood and those units will only place a further burden on the roadway infrastructure, especially as drivers look to alternate routes to avoid congestion 'bottlenecks' at key intersections across the neighborhood. While we do appreciate the passive recreation opportunities along our unimproved roadways, adequate roadway infrastructure is necessary as the neighborhood continues to grow and densify. And requiring actual construction in lieu of fee payment is also supported by the WNA LUC.

Figure 1: Unimproved Roadways in the Woodstock Neighborhood



Source: Roadway Not Improved: Exploring temporary uses and community-based alternatives for unimproved streets (January 2010)

33.205.040.C.5 – PROPOSED AMENDED CODE LANGUAGE

5. *Visitability.*

- a. *Purpose.* The visitability standard ensures that a baseline of accessible features is provided to accommodate people living in or visiting a residence regardless of age or ability. The standards:
- Promote a diverse supply of more physically accessible housing;
 - Allow people of all ages and abilities to easily enter and visit the residence;
 - Foster community interaction by reducing barriers that can lead to social isolation; and
 - Enhance public safety for all residents and visitors.
- b. *When the visitability standard applies.* Unless exempted by Subparagraph C.5.d, the visitability standard applies in the following situations:
- (1) When there are two accessory dwelling units on a site with a house, attached house or manufactured home; and
 - (2) When there is one accessory dwelling unit on a site with a duplex.
- c. *Visitability standard.* Unless exempted by Subparagraph C.5.d., at least one dwelling unit on the lot must meet the requirements for Type C visitable units in ICC A117.1 (2009 Edition) and must have at least 200 square feet of living area on the same floor as the main entrance. The property owner must execute a covenant with the City that meets the requirements of Section 33.700.060 and ensures that the features required by the Type C standards are retained for the life of the dwelling unit.
- d. *Exemptions.* The following are exempt from Subparagraph C.5.c:
- (1) Lots with an average slope of 20 percent or greater;
 - (2) Lots where there is more than a 3-foot rise between the highest elevation along the street lot line and the lowest grade measured at the front setback.
 - (3) Conversion of an existing residential structure to a triplex or fourplex.

Response: The WNA LUC endorses the proposed amended code language as it relates to visitability and access to housing for people of all ages and abilities. The WNA LUC is a big proponent of creating housing options and diverse neighborhoods that allow for aging in place for residents.

Amendments Package #2- Amendments to Implement a Portion of House Bill 2001
33.110.255.C.2. Small flag lots—COMMENTARY

Specific development standards for development on small flag lots are being added to address structure size and design compatibility. Development on small flag lots (former backyard space) has the potential to overwhelm existing surrounding development especially on small sites with limited area for buffering. Additional size, height limit and design requirements are proposed to ensure more compatible development of these lots in R5 zones.

The new standards generally apply the height and design standards that apply to a detached accessory dwelling unit. This includes a 20-foot height limit and material, trim, and eave requirements that encourage matching the house on the front lot.

An FAR max of .5 is applied even when the lot has an ADU or is developed with a duplex. Given the small lot size and the building location in the former back yard of the house, the larger .6 FAR has a greater potential to impact adjacent neighbors. Where .5 FAR can be accommodated in a single level within building coverage limits, .6 FAR requires at least a portion of the structure have a second level.

33.110.255.C.2. Small flag lots—PROPOSED AMENDED CODE LANGUAGE

2. Small flag lots. The following standards apply to flag lots where the flag portion of the lot is less than 3,000 square feet in area:

a. Setbacks. Small flag lots have a 5 foot required building setback along all lot lines;

b. Building coverage. Only the area of the flag portion of the flag lot is included when calculating building coverage. The area of the pole portion of the lot is not included;

c. Maximum FAR. In the RF through R5 zones, the maximum floor area ratio allowed on a small flag lot is .5 to 1.

d. Maximum height. In the RF through R5 zones, the maximum height allowed for all structures is 20 feet. e. Design standards. In the RF through R5 zones, the following design standards apply to structures that are more than 15 feet high:

(1) The exterior finish material must be the same in type, size and placement as the exterior finish material on the primary structure on the lot in front of the flag lot, or be made from brick, stucco, wood, composite boards, vinyl or aluminum. Wood, composite boards, vinyl or aluminum siding must be arranged in a shingle, horizontal clapboard, or shiplap pattern. The boards in the pattern must be 6 inches or less in width.

(2) The pitch of the roof with the highest ridgeline must be the same as the pitch of the roof with the highest ridgeline of the primary structure on the lot in front of the small flag lot or be at least 6/12.

(3) The trim around all windows and doors must be the same as the window and door trim on the primary structure on the lot in front of the flag lot or be at least 3-1/2 inches wide.

(4) The eaves must project the same as the eaves on the primary structure on the lot in front of the flag lot, or project from the building walls at least 1 foot on all elevations.

Response: The WNA LUC endorses the proposed amended code language as it relates to a 0.5 FAR limit for small flag lots, particularly for former backyard spaces that may be incongruent with surrounding development.

Amendments Package #3- Amendments to Implement Senate Bill 534

33.110.202.C. Primary Structures Allowed—COMMENTARY

This section is amended to incorporate provisions relating to 2019 Senate Bill 534. This requires that development of at least one unit be allowed on each platted lot, unless the City determines the lot is constrained by natural resources, hazards, or lack of infrastructure. These revised standards address four types of parcels:

Lot – platted through a recorded subdivision or partition plat.

Lot of record – a piece of property that is not a lot and was established by a deed recorder prior to July 26, 1979.

Adjusted lot – this term is being modified (see 33.910). Adjusted lots will now refer to lots that have had their property lines adjusted (either by deed prior to 1979, or property line adjustment) and are as large as or larger than the original lot size.

Lot remnant – this term is also being modified (see 33.910). Lot remnants will now refer to lots that have had their property lines adjusted (either by deed prior to 1979, or property line adjustment) and are smaller in size than the original lot.

Key changes to this section include:

- *When parcels are smaller than the dimensions listed in Table 110-3, they are generally ineligible for primary structures. Additional provisions in 33.110.202.C.4.b. will allow development of a primary structure on smaller historically platted lots (and adjusted lots) when topography, and natural resource or hazard constraints are not present, consistent with the requirements of Senate Bill 534. It is possible that lots, lots of record, adjusted lots, and/or lot remnants that may not individually meet the requirements of this section would meet these requirements when combined with other properties.*
- *The current exception in R5 zones which allows development on 2,400 sf lots when they have been vacant for 5 years is replaced by a consistent 3,000 sf lot size (matches land division code for new lots). R5 lots (and adjusted lots) that are smaller than 3,000 sf will be subject to the SB534 “constraints test” before primary structures are allowed; however, these smaller lots will no longer be limited based on their vacancy status.*
- *Removing provisions for West Portland Park. SB534 restricts blanket lot size restrictions, instead focusing on specific constraints to determine whether development is allowed.*

33.110.202.C.4.b.

Senate Bill 534 allows cities to exclude platted lots from development if they are encumbered with certain constraints, including:

Natural resources - The lot has environmental overlay zones (c or p zone)

Natural hazards - The lot is within a flood hazard area

Slopes - The lot has an average slope of 25% or greater

33.110.202.C. When Primary Structures are Allowed—PROPOSED AMENDED CODE LANGUAGE

- A. Purpose.** *The regulations of this section allow for development of primary structures on lots and lots of record that are an adequate size, but do not legitimize plots that were divided after subdivision and partitioning regulations were established. The regulations ensure that development on a site will in most cases be able to comply with all site development standards. The regulations also allow development of primary structures on lots that were large enough in the past, but were reduced by condemnation or required dedications for right-of-way.*
- B. Adjustments.** *Adjustments to this section are prohibited.*
- C. Primary structures allowed.** *In all areas outside the West Portland Park Subdivision, Development of a primary structures ~~is~~ are allowed as follows:*
1. *On a lots created on or after July 26, 1979;*
 2. *On a lots created through the Planned Development or Planned Unit Development process;*

3. *On a lot, lots of record, adjusted lot, lot remnants, or combinations thereof that did have not abutted a lot, lot of record, adjusted lot, or lot remnant under the same ownership on July 26, 1979 or any time since that date;*
4. *On a lot or adjusted lot or combination thereof that either; lots of record, lot remnants, or combinations thereof created before July 26, 1979 that meet the requirements of Table 110-6.*
 - a. *Meets the minimum lot size requirements stated in Table 110-3; or*
 - b. *Does not meet the minimum lot size requirements stated in Table 110-3 but meets all of the following:*
 - (1) *No portion of the lot, adjusted lot or combination is in an environmental protection, environmental conservation, or river environmental overlay zone;*
 - (2) *No portion of the lot, adjusted lot or combination is in the special flood hazard area; and*
 - (3) *The lot, adjusted lot or combination has an average slope of less than 25 percent;*

Response: The WNA LUC endorses this proposed code amendment, as it applies a consistent 3,000 SF minimum lot size for lots within the R5 zone that matches the land division code for new lots. The SB 534 “constraints test” for lots smaller than 3,000 SF is an adequate measure to determine whether a smaller lot is suitable for primary structure development. These amendments provide some level of standardization while also allowing for development on smaller lots that will hopefully help to address the lack of attainable housing stock for lower income residents.

Table 110-3—COMMENTARY

The major changes to this table affect the R5 zone. Whereas previously, an R5 lot that was not in an environmental zone and was vacant for the prior 5 years could be as small as 2,400 square feet, these changes require all lots (and adjusted lots, lots of record, and lot remnants) to meet the minimum lot sizes in the land division code. For the R5 zone, this means 3,000 square feet minimum. Lots and adjusted lots below this 3,000 square foot minimum must be free from the applicable constraints listed in 33.110.202.C.4 in order to allow primary structures.

Footnotes:

Footnote [1] is the same as the previous footnote [4]

The former footnote [1] is no longer necessary due to reformatting of the table.

Footnote [2] moves the caveat relating to right of way dedication from the standards in 33.110.202.C. embedding it as part of the table as it relates to calculating lot sizes.

The former footnote [2] is no longer necessary as it relates to when an R5 lot is considered vacant.

Footnote [3] moves the caveat relating to R20 zone changes completed as part of the Comprehensive Plan from the standards in 33.110.202.C. embedding it as part of the table as it relates to calculating lot sizes.

The former footnote [3] has been revised and updated as reflected in footnote [4]

Footnote [4] allows primary structures on lots that have been previously confirmed prior to these new rules going into effect.

Table 110-3—PROPOSED AMENDED CODE LANGUAGE

Table 110-36 Minimum Lot Size Requirements Dimension Standards for Lots, Adjusted Lots, Lots of Record, and Lot Remnants Created Prior to July 26, 1979		
RF through R5R7 Zones		
Lots, including Adjusted Lots [1]	36 feet wide and meets the minimum lot area requirement of Table 610-2. [1, 2, 3, 4, 5]	
Adjusted Lot		
Lot Remnants		
Lots of Record		
R5 Zone		
Lots, including Adjusted Lots [1, 2]	If the lot has had a dwelling unit on it in the last five years or is in an environmental zone [2]	3000 sq. ft. and 36 ft. wide [4]
	If the lot has not had a dwelling unit on it within the last five years and is not in an environmental zone	2400 sq. ft. and 25 ft. wide [4]
	If the lot was approved through a property line adjustment under 22.667.300.A.4.	1600 sq. ft. and 36 ft. wide [4]
Lot Remnants [3]		3000 sq. ft. and 36 ft. wide [4]
Lots of Record [1, 3]		3000 sq. ft. and 36 ft. wide [4]
R2.5 Zone		
Lots, including Adjusted Lots [1]	1600 sq. ft. [1, 4]	
Adjusted Lot		
Lot Remnants		
Lots of Record		

Notes:

- A.** A primary structure is allowed on a lot or lot of record that did meet the requirements of Table 110-3 in the past but was reduced below the requirements solely because of condemnation or required dedication by a public agency for right-of-way. If the property is both an adjusted lot and a lot of record, the site may meet the standards for adjusted lots.
- B.** In the R5 zone, the minimum size requirements for adjusted lots and lot remnants approved through a property line adjustment under 33.677.300.A.4. or 33.677.300.C. are 36 ft. wide and 1,600 sq. ft. Primary structures are allowed if the site has had a dwelling unit on it within the last five years that has been demolished as a public nuisance under the provisions of Chapter 29.40.030 or 29.60.080. The site is exempt from minimum lot dimension standards.
- C.** In the R20 zone, a primary structure is allowed on a lot, lot of record, adjusted lot, lot remnant, or combination thereof that did meet the requirements of Table 110-3 in the past but no longer meets the requirements solely due to a zone change effective on May 24, 2018. Primary structures are allowed on a site if it has been under a separate tax account number from abutting lots or lots of record on April 24, 2010 or an application was filed with the City before April 24, 2010 authorizing a separate tax account and the site has been under separate tax account from abutting lots or lots of record by April 24, 2011. The site is exempt from minimum lot dimension standards. [4] A primary structure is allowed on a lot, lot of record, adjusted lot, lot remnant, or combination thereof that was separated from abutting lots through a lot confirmation that was finalized before [INSERT EFFECTIVE DATE]
- [5] Lot width for a flag lot is measured at the midpoint of the flag portion of the lot.

Response: As a large portion of the Woodstock Neighborhood is within the R5 zoning designation, the minimum size requirements for adjusted lots and lot remnants approved through a property

line adjustment are 36-feet wide and 1,600 SF. The 1,600 SF minimum lot size for adjusted and remnant lots is significantly smaller than the 3,000 SF minimum for standard lots.

33.205.020.B.2—COMMENTARY

In the R7 – R2.5 zone, a larger lot size is required for the third unit and the lot must front on a street that has been accepted for maintenance (consistent with the standards for triplexes – 33.110.265.E)

Additionally, to avoid potential conflicts with the building code, only one ADU is allowed within a house and an ADU added to a duplex must be detached. Three units with one structure must be permitted as a triplex under the building code.

33.205.020.B.2—PROPOSED AMENDED CODE LANGUAGE

B. R7 through R2.5.

1. One accessory dwelling unit is allowed on a site with a house, attached house or manufactured home in the R7 through R2.5 zones when the lot complies with Section 33.110.202, When Primary Structures are Allowed.
2. Up to two accessory dwelling units are allowed on a site with a house, attached house or manufactured home in the R7 through R2.5 zones when the lot meets the minimum lot area requirement stated in Table 205-1. Two accessory dwelling units are prohibited on lots that do not abut a street that has been accepted for maintenance by the City of Portland, or the State of Oregon in the case of state highways, and are prohibited on lots that abut a private street that connects to a street or highway that has not been accepted for maintenance by the City or State. See Title 17.42, Property Owner Responsibility for Streets. Payment in lieu of street improvements does not satisfy this requirement. If there are two accessory dwelling units on the site, only one may be attached to or within the primary structure.
3. One accessory dwelling unit is allowed on a site with a duplex in the R7 through R2.5 zones when the lot meets the minimum lot area requirements stated in Table 205-1. An accessory dwelling unit is prohibited on lots that do not abut a street that has been accepted for maintenance by the City of Portland, or the State of Oregon in the case of state highways, or is prohibited on lots that abut a private street that connects to a street or highway that has not been accepted for maintenance by the City or State. See Title 17.42, Property Owner Responsibility for Streets. Payment in lieu of street improvements does not satisfy this requirement. The accessory dwelling unit must be detached.

Response: The WNA LUC endorses the proposed amended code language as it relates to development proposals on lots that abut a street that have been accepted for maintenance by the City of Portland. More than 8% of roadways within the Woodstock Neighborhood (and almost 20% within the quarter mile core of the commercial corridor) are unimproved roadways in need of paving, curbs, sidewalks, landscape strips, etc that are generally required when new construction is initiated. This is not always the case within the City of Portland, where ADU additions and single-family renovations or new construction have not triggered the requirement for frontage improvements. This is especially prevalent in Woodstock and only becoming more critical with larger proposed projects slated for construction. There are more than 300 units approved or in permitting process within the Woodstock Neighborhood and those units will only place a further burden on the roadway infrastructure, especially as

drivers look to alternate routes to avoid congestion ‘bottlenecks’ at key intersections across the neighborhood. While we do appreciate the passive recreation opportunities along our unimproved roadways, adequate roadway infrastructure is necessary as the neighborhood continues to grow and densify. And requiring actual construction in lieu of fee payment is also supported by the WNA LUC.

Amendments Package #6- Deeper Affordability Infill Option

Table 110-2-- COMMENTARY

The reference to duplexes and attached houses on transitional lots is being deleted from the table because the transitional lot alternative development option is being deleted (see page 67 for further discussion).

References to triplexes and fourplexes are being added because those housing types will be allowed as described in 33.110.265, Residential Infill Options (see page 113)

Multi dwelling structures are generally not allowed in single dwelling zones, except when approved as part of a planned development; however a new residential infill option allows for up to 6 units in a building in the R2.5, R5, and R7 zones when at least 50% of the units are affordable at 60% MFI see (33.110.265.F)

A reference to multi-dwelling development is being added to the table because the housing type is currently allowed in single dwelling zones through a planned development, but the table has not included the reference.

The term group structure is being corrected to match the actual name of the residential structure type—group living facility.

33.110.200 Housing Types Allowed- PROPOSED AMENDED CODE LANGUAGE

Development Standards

- A. *Purpose. Housing types are limited in the single-dwelling zones to maintain the overall image and character of the City's single-dwelling neighborhoods. However, the regulations allow options to increase housing variety and opportunities, and to promote affordable and energy-efficient housing.*
- B. *Housing types. The kinds of housing types allowed in the single-dwelling zones are stated in Table 110-2.*

Table 110-2 Housing Types Allowed In The Single-Dwelling Zones						
Housing Type	RF	R20	R10	R7	R5	R2.5
House	Yes	Yes	Yes	Yes	Yes	Yes
Attached house (See 33.110.260.C and 33.110.240265.C, E & H)	No	Yes	Yes	Yes	Yes	Yes
Accessory dwelling unit (See 33.205)	Yes	Yes	Yes	Yes	Yes	Yes
Duplexes: On corners (See 33.110.240265.DE) On transitional lots (See 33.110.240.H.) Other situations (See 33.110.240265.D)	No No No	Yes Yes No	Yes Yes No	Yes Yes No Yes	Yes Yes No Yes	Yes Yes Yes
Triplexes (See 33.110.265.E)	No	No	No	Yes	Yes	Yes
Fourplexes (See 33.110.265.E)	No	No	No	Yes	Yes	Yes
Multi-dwelling Structure (See 33.110.265.F)	No	No	No	Yes	Yes	Yes
Manufactured home (See Chapter 33.251)	Yes	Yes	Yes	Yes	Yes	Yes
Manufactured Dwelling park	No	No	No	No	No	No
Houseboat (See Chapter 33.236)	Yes	Yes	Yes	Yes	Yes	Yes
Single Room Occupancy (SRO) units	No	No	No	No	No	No
Attached Duplexes	Only in Planned Developments, See Chapter 33.270.					
Group Living Facility structure	Only when in conjunction with an approved conditional use.					
Multi-dwelling structure	Only in Planned Developments, See Chapter 33.270					
Multi-dwelling Development	Only in Planned Developments, See Chapter 33.270.					

Yes = allowed; No = prohibited.

Response: The WNA LUC endorses the proposed amended code language as it relates to multi-dwelling structures allowed in the R7 through R2.5 zones. The hope is that by allowing a greater diversity of housing types in our predominantly single-family residential zones we can work to provide adequate and diverse housing to address the growing affordability and houselessness crisis. However, the LUC is concerned with the scale and building massing associated with larger developments in our neighborhood. While DOZA has been amended to remove any design overlay for the Woodstock Corridor, we will continue to work with the City and developers working in our neighborhood to provide new development that considers the existing fabric and context of the Woodstock neighborhood. It should also be noted that the WNA LUC is concerned that by “packing in” additional multi-dwelling structures or units to a smaller R5 site will result in substandard units that don’t meet healthy livings conditions with access to direct light, fresh air and outside views. As noted in previous letters submitted by concerned Woodstock residents to the City, the provision of

quality units is not only a question of healthy living conditions but also one of equity and stable community-building.

Table 110-4-- COMMENTARY

This table is being amended to include the floor area ratio (FAR) limits that are being added to the R7, R5, and R2.5 zones. FAR will be used as the principle tool for reducing the maximum size of buildings in these zones. FAR will be allotted based on the zone, the size of the lot and the number of dwelling units proposed. The table below shows housing types and the maximum FAR allowed across the three zones. Bonus FAR (0.1) will be allowed when either one unit is affordable at 80% MFI, or when units are added to a site and an existing house is retained (see page 29). FAR of 1.2 is allowed for multi dwelling structures when adhering to the deeper affordability bonus in 33.110.265.F.

	# of units	Allowed housing type	FAR	Min lot size (sf)	New max bldg size	average unit size*	Current code max bldg. size**
R7 Zone	1	House	0.4	4,200	1,680	1680	5,850
	2	Duplex or house + ADU	0.5		2100	1050	
	3	Triplex or duplex + ADU or house + 2 ADUs	0.6	5,000	3,000	1000	6,750
	4	Fourplex			750		
	4-6	Multi-dwelling structure	1.2		6,000	1,000-1,500	
R5 Zone	1	House	0.5	3,000	1,500	1500	4,500
	2	Duplex or house + ADU	0.6		1800	900	
	3	Triplex or duplex + ADU or house + 2 ADUs	0.7	4,500	3,150	1050	6,187
	4	Fourplex			787.5		
	4-6	Multi-dwelling structure	1.2		4,500	900-1,350	
R2.5 Zone	1	House	0.7	1,600	1,120	1120	2,800
	2	Duplex or house + ADU	0.8		1280	640	
	3	Triplex or duplex + ADU or house + 2 ADUs	0.9	3,200	2,880	960	5,512
	4	Fourplex			720		
	4-6	Multi-dwelling structure	1.2		3,200	640-960	

* average unit sizes are derived from the total building size divided by number of units

** Current code max building sizes are derived from lot size, building coverage and height limits

The table is also being amended to consolidate the R2.5 attached and detached standards because the only remaining distinction between the two housing types within the zone is a slightly smaller outdoor area. This change will decrease the outdoor area requirement for detached houses.

And, a reference to the building coverage table is being incorporated into the summary table so that the table is a more comprehensive list of development standards.

Table 110-4—PROPOSED AMENDED CODE LANGUAGE

Table 110-4 Summary of Development Standards In Single-Dwelling Zones							
Standard	RF	R20	R10	R7	R5	R2.5 Detached/attached See 33.110.240.C	
<u>Maximum FAR</u> - 1 total dwelling unit - 2 total dwelling units [1] - 3 or more total dwelling units [1] (See 33.110.210 and 33.110.265)	no limit	no limit	no limit	0.4 to 1 0.5 to 1 0.6 to 1	0.5 to 1 0.6 to 1 0.7 to 1		0.7 to 1 0.8 to 1 0.9 to 1
<u>Maximum FAR with Bonus</u> - 1 total dwelling unit - 2 total dwelling units [1] - 3 or more total dwelling units [1] (See 33.110.210 and 33.110.265)	NA	NA	NA	0.4 to 1 0.6 to 1 0.7 to 1 [2]	0.5 to 1 0.7 to 1 0.8 to 1 [2]		0.7 to 1 0.9 to 1 1 to 1 [2]
<u>Maximum Height</u> (See 33.110.215)	30 ft.	30 ft.	30 ft.	30 ft. [2]	30 ft. [2]	35 ft.	35 ft.
<u>Minimum Setbacks</u> - Front building setback - Side building setback - Rear building setback - Garage entrance setback (See 33.110.220)	20 ft. 10 ft. 10 ft. 18 ft.	20 ft. 10 ft. 10 ft. 18 ft.	20 ft. 10 ft. 10 ft. 18 ft.	15 ft. 5 ft. 5 ft. 18 ft.	10 ft. 5 ft. 5 ft. 18 ft.	10 ft. 5 ft. 5 ft. 18 ft.	10 ft. 0/5 ft. 5 ft. 18 ft.
<u>Maximum Building Coverage</u> (See 33.110.225)	See Table 110-6		See Table 110-6				
<u>Required Outdoor Area</u> - Minimum area - Minimum dimension (See 33.110.240-235)	250 sq. ft. 12 ft. x 12 ft.	250 sq. ft. 12 ft. x 12 ft.	200 sq. ft. 10 ft. x 10 ft.				

[1] Including accessory dwelling units.

[2] For sites using 33.110.265.F, maximum FAR is 1.2 to 1 and maximum height is 35 feet.

Response: The WNA LUC endorses the proposed amended code language as it relates to increased FAR and building heights for projects that qualify for the deeper affordability bonus under 33.110.265.F. The hope is that by allowing a greater diversity of housing types in our predominantly single-family residential zones we can work to provide adequate and diverse housing to address the growing affordability and houselessness crisis. However, the LUC is concerned with the scale and building massing associated with larger developments in our neighborhood. While DOZA has been amended to remove any design overlay for the

Woodstock Corridor, we will continue to work with the City and developers working in our neighborhood to provide new development that considers the existing fabric and context of the Woodstock neighborhood. It should also be noted that the WNA LUC is concerned that by “packing in” additional multi-dwelling structures or units to a smaller R5 site will result in substandard units that don’t meet healthy living conditions with access to direct light, fresh air and outside views. As noted in previous letters submitted by concerned Woodstock residents to the City, the provision of quality units is not only a question of healthy living conditions but also one of equality and stable community building.

33.110.265.E and 33.110.265.F Affordable fourplexes and multi-dwelling structures—COMMENTARY

To qualify for this new voluntary bonus, projects will generally need to have at least 50 percent of units on the site affordable to households earning no more than 60 percent of MFI. In combination with related amendments to Title 30 (Affordable Housing), this bonus provides an affordable home ownership option for projects in which at least half of the units are ownership units affordable to households earning no more than 80 percent of MFI. The minimum required percentage of 50 percent will allow developments to include some market-rate units to help offset the costs of the affordable units and allow for income diversity. Both this bonus and the standard inclusionary housing bonus will involve the Housing Bureau in administration (administrative rules will require rental units to remain affordable for a term of 99 years and ownership units to be affordable for 10 years).

This bonus provides up to 1.2 FAR (an added 0.6 FAR in R7, 0.5 FAR in R5, or 0.2 FAR in R2.5), an additional 5 feet of height in R7 and R5 (35’ total), and two more dwelling units (up to 6 maximum). Greater variability in the number of allowed units (4-6) within the maximum FAR provides more options for providing larger family-sized units, or a greater mix of unit sizes especially on larger sized lots.

Similar requirements for lot eligibility apply to these housing types as apply to triplexes and fourplexes (lot size, sited on an improved street, located outside the ‘z’ overlay).

For these building types, at least two visitable units are required.

33.110.265.F Affordable fourplexes and multi-dwelling structures—PROPOSED AMENDED CODE LANGUAGE

F. Affordable fourplexes and multi-dwelling structures. *Fourplexes and multi-dwelling structures with no more than six dwelling units are allowed on interior and corner lots in the R7 through R2.5 zones when the following standards are met. Fourplexes and multi-dwelling structure are prohibited on lots that abut a street that has not been accepted for maintenance by the City of Portland, or the State of Oregon in the case of state highways, and are prohibited on lots that abut a private street that connects to a street or highway that has not been accepted for maintenance by the City or State. See Title 17.42, Property Owner Responsibility for Streets. Payment in lieu of street improvements does not satisfy this requirement.*

- 1. Density.** *A maximum of six dwelling units are allowed. More than six dwelling units are prohibited.*
- 2. Affordability.** *50 percent of the total number of dwelling units on the site must be affordable to those earning no more than 60 percent of the area median family income. The applicant must*

provide a letter from the Portland Housing Bureau certifying that the development meets the affordability requirement of this option and any administrative requirements of the Portland Housing Bureau. The letter must be submitted before a building permit can be issued for the development but is not required in order to apply for a land use review. Adjustments are prohibited.

3. Minimum lot area. Lots for multi-dwelling structures must meet the minimum lot area requirement shown in Table 110-7. Adjustments are prohibited.

4. Maximum FAR. The maximum FAR is 1.2 to 1. Adjustments are prohibited.

5. Maximum Height. The maximum height is 35 feet. Adjustments are prohibited.

6. Visitability.

a. Purpose. The visitability standard ensures that a baseline of accessible features is provided to accommodate people living in or visiting the residence regardless of age or ability. The standards:

- Promote a diverse supply of more physically accessible housing;*
- Allow people of all ages and abilities to easily enter and visit the residence;*
- Foster community interaction by reducing barriers that can lead to social isolation; and*
- Enhance public safety for all residents and visitors.*

b. VISIBLE unit standard. Unless exempted by Subparagraph E.3.c., at least two dwelling units on the lot must meet the requirements for Type C visitable units in ICC A117.1 (2009 Edition) and each must have at least 200 square feet of living area on the same floor as the main entrance. The property owner must execute a covenant with the City that meets the requirements of Section 33.700.060 and ensures that the features required by the Type C standards are retained for the life of the dwelling unit.

c. Exemptions. The following are exempt from Subparagraph E.3.b:

- (1) Lots with an average slope of 20 percent or greater;*
- (2) Lots where there is more than a 3-foot rise between the highest elevation along the street lot line and the lowest grade measured at the front setback.*
- (3) Conversion of an existing residential structure to a fourplex or multi-dwelling structure.*

Response: The WNA LUC endorses the proposed amended code language as it relates to the FAR bonus, the additional 5-feet of height in R7 and R5 zones, and the opportunity for two more dwelling units (up to 6 maximum) for projects that meet the affordable housing metric. The hope is that by allowing a greater diversity of housing types, sizes, and quantities in our predominantly single-family residential zones we can work to provide adequate and diverse housing to address the growing affordability and houselessness crisis. However, the LUC is concerned with the scale and building massing associated with larger developments in our neighborhood. While DOZA has been amended to remove any design overlay for the Woodstock Corridor, we will continue to work with the City and developers working in our neighborhood to provide new development that considers the existing fabric and context of the Woodstock neighborhood. It should also be noted that the WNA LUC is concerned that those units or dwellings deemed affordable must be equivalent units to the other units as it

relates to healthy living conditions with access to direct light, fresh air and outside views. As noted in previous letters submitted by concerned Woodstock residents to the City, the provision of quality units is not only a question of healthy living conditions but also one of equality and stable community building.

30.01.140 Deeper Housing Affordability FAR Bonus Program-- COMMENTARY

These changes expand the Deeper Housing Affordability FAR Bonus Program that was created for the Multi-dwelling zones "Better Housing by Design project" to apply to single dwelling zone areas as well. This works in conjunction with the "affordable fourplexes and multi-dwelling structures" bonus in 33.110.265.F (Residential Infill Options). To qualify for this new voluntary bonus, projects will need to have at least 50 percent of units on the site affordable to households earning no more than 60 percent of MFI. This bonus alternatively provides an affordable home ownership option for projects in which at least half of the units are ownership units affordable to households earning no more than 80 percent of MFI.

Several other wording refinements are also included in these amendments for greater clarity and consistency.

30.01.140 ~~Multi-Dwelling Zones~~ Deeper Housing Affordability FAR Density Program. PROPOSED AMENDED CODE LANGUAGE

- D. Purpose Statement. The City intends to implement the ~~Multi-Dwelling Zones~~ Deeper Housing Affordability FAR Density Bonus Program (the "DHA Program") to increase the numbers of ~~D~~dwelling ~~u~~units available for sale or for rent to households earning incomes that fall within particular City established parameters.*
- E. Administration.*
- 1. PHB will certify whether the applicant's proposed development meets the standards and requirements set forth in PCC ~~Subsection~~ 33.120.211.C.2., ~~PCC Subsection 33.110.265.F,~~ and this Section.*
 - 2. PHB may adopt, amend, and repeal Administrative Rules and prepare forms for the implementation, administration and compliance monitoring consistent with the provisions of this Section 30.01.140. The Director of PHB, or a designee, shall have the authority to modify the Administrative Rules as necessary to meet current City housing program requirements. PHB Administrative Rules will set forth clear and objective criteria to establish minimum ~~development~~ standards for ~~Affordable Housing~~ units ~~subject to restricted under~~ the DHA Program.*
- F. Standards. ~~Developments~~Buildings or sites approved for the DHA Program must satisfy the following criteria:*
- 1. Dwelling units for sale shall remain affordable for a period of at least 10 years and be available to households earning 80 percent or less of area ~~median income, MFI, and~~ ~~d~~dwelling units for rent shall remain affordable for a period of 99 years and be available to households earning 60 percent or less of area ~~median income~~ ~~MFI~~;*

2. Owners are required to sign a ~~Regulatory Agreement~~ covenant that will encumber the property receiving a density bonus under the DHA Program, and will be recorded in the official records of Multnomah County, Oregon;
3. For rental ~~Dwelling Units~~, the owner or a representative shall submit annual documentation of tenant income and rents to PHB;
4. The City may inspect ~~any of the affordable rental Dwelling Units in the building for fire, life, and safety hazards and~~ for compliance with DHA Program requirements and may inspect files documenting tenant income and rents of the affordable rental ~~Dwelling Units~~; and
5. Failure to meet the requirements of the DHA Program will result in a penalty, and may result in legal action.

G. Penalties.

1. In the event of a failure to meet the requirements of the DHA Program and the additional requirements established in the ~~Regulatory Agreement~~ ~~covenant~~, PHB may choose, to negotiate with the building owner to bring the building into ~~project~~ compliance.
2. Should PHB and the owner not agree upon an acceptable remedy to bring the project into compliance, the owner will owe financial penalties payable to PHB as follows:

- ~~Dwelling units for rent:~~

~~For-Rent Dwelling Unit Penalty.~~ For a building ~~or site~~ with rental ~~Dwelling Units~~, a penalty equal to multiplying the gross square feet of the residential and residential-related portions of the ~~building or buildings~~ by \$23; ~~and~~

~~Interest.~~ Interest on the entire unpaid ~~For-Rent Dwelling Unit~~ ~~Penalty~~ amount, assessed at the rate of .833 percent simple interest per month or fraction thereof (10 percent per annum), computed from the date of default; ~~and~~

~~Financial Incentives.~~ Repayment of any financial incentives and exemptions received according to code and ~~Administrative Rules~~ including, but not limited to, system development charges, property taxes, and construction excise taxes; and

~~Additional Penalties.~~ PHB may pursue any remedy available at law, or in equity, including but not limited to injunctive relief, and other remedies such as foreclosure, or receivership if the financial penalties established in this Subsection 2. are not timely paid in accordance with the timeframe prescribed by PHB or a court of competent jurisdiction.

Upon ~~the Owner's~~ payment in full of the applicable ~~For-Rent~~ Dwelling Unit Penalty, Interest, Financial Incentives repayment amounts due and payment of any Additional Penalties, the impacted ~~building and for sale Dwelling Units~~ for rent will cease to be bound to the restrictions of the DHA Program, and PHB will release the ~~covenant~~.

A. ~~For Sale Dwelling Unit Penalty.~~ Dwelling units for sale:

1. For ~~for Sale Dwelling Units~~ for sale, after the initial sale to an eligible homebuyer, the repayment of the difference between the ~~Restricted Sale Price~~ and the assessed value for each dwelling unit as stated in the DHA Program ~~Covenant~~ ~~Administrative Rules~~; and
2. **For-Sale Dwelling Unit Penalty.** For a building or site with dwelling units for sale, a penalty equal to multiplying the gross square feet of each dwelling unit and the corresponding percentage of the residential and residential-~~related portions of the building~~ by \$23;

Interest. Interest on the entire unpaid **For-Sale Dwelling Unit** Penalty amount, assessed at the rate of .833 percent simple interest per month or fraction thereof (10 percent per annum), computed from the date of default; ~~and~~

Financial Incentives. Repayment of any financial incentives and exemptions received according to code and ~~Administrative r~~ **Rules** including, but not limited to, system development charges, property taxes, and construction excise taxes; and

Additional Penalties. PHB may pursue any remedy at law, or in equity, including but not limited to injunctive relief, and other remedies such as foreclosure, or receivership if the financial penalties established in this ~~Section~~ **Subsection 2.** are not timely paid in accordance with the timeframe prescribed by PHB or a court of competent jurisdiction.

Upon ~~Owner's~~ **owner's** payment in full of the applicable **For-Sale** Dwelling Unit Penalty, Interest, Financial Incentives ~~Repayment~~ amounts due and payment of any Additional Penalties, the impacted ~~for Sale Dwelling Unit~~ **unit for sale** will cease to be bound to the restrictions of the DHA Program and PHB will release the ~~Covenant~~ **for that dwelling unit.**

Response: The WNA LUC endorses the proposed amended code language as it relates to the deeper affordability bonus provisions and the requirements for dwelling units for sale and for rent. These covenants and requirements will work to maintain this housing stock in perpetuity.

Amendments Package #7- Historic Resource Demolition Disincentive

33.110.265.E and 33.110.265.F Triplexes and fourplexes—COMMENTARY

To further encourage adaptive reuse of existing historic resources and discourage their demolition, additional restrictions apply for sites where a contributing structure in Historic or Conservation Districts, or Historic or Conservation Landmark have been demolished without demolition review. This limitation would apply for a period of 10 years following the demolition and restricts the residential infill options to a house, house+ADU, or duplex.

33.110.265.E and 33.110.265.F Triplexes and fourplexes—PROPOSED AMENDED CODE LANGUAGE

E. Triplexes and fourplexes. Triplexes and fourplexes that meet the following standards are allowed on interior and corner lots in the R7 through R2.5 zones. Triplexes and fourplexes are prohibited on lots that abut a street that has not been accepted for maintenance by the City of Portland, or the State of Oregon in the case of state highways, and are prohibited on lots that abut a private street that connects to a street or highway that has not been accepted for maintenance by the City or State. See Title 17.42, Property Owner Responsibility for Streets. Payment in lieu of street improvements does not satisfy this requirement. **Triplexes and fourplexes are also prohibited on lots where a Historic or**

Conservation Landmark or a contributing structure in a Historic or Conservation District was demolished within the past ten years unless the landmark or contributing structure was destroyed by fire or other causes beyond the control of the owner, the only structure that was demolished was an accessory structure, or the demolition was approved through demolition review.

- F. Affordable fourplexes and multi-dwelling structures. Fourplexes and multi-dwelling structures with no more than six dwelling units are allowed on interior and corner lots in the R7 through R2.5 zones when the following standards are met. Fourplexes and multi-dwelling structures are prohibited on lots that abut a street that has not been accepted for maintenance by the City of Portland, or the State of Oregon in the case of state highways, and are prohibited on lots that abut a private street that connects to a street or highway that has not been accepted for maintenance by the City or State. See Title 17.42, Property Owner Responsibility for Streets. Payment in lieu of street improvements does not satisfy this requirement. Fourplexes and multi-dwelling structures are also prohibited on lots where a Historic or Conservation Landmark or a contributing structure in a Historic or Conservation District was demolished within the past ten years unless the landmark or contributing structure was destroyed by fire or other causes beyond the control of the owner, the only structure that was demolished was an accessory structure, or the demolition was approved through demolition review.*

Response: The WNA LUC endorses the proposed amended code language as it relates to the preservation of historic buildings within our neighborhoods. The proposed disincentives will place some limitation on redevelopment for historic structures.

Based on these findings, we strongly encourage that the Residential Infill Project (RIP) proposed code amendments be adopted by City Council. The Woodstock community strongly supports issues of houselessness and attainable housing for all. However, we do want to stress that current development patterns and trends are not meeting the goal of affordable housing for all and we as a City and neighborhood must do more to ameliorate the situation.

Sincerely,



Thatch Moyle
Co-Chair, Land Use Committee
Woodstock Neighborhood Association

Thatch Moyle

#144024 | June 3, 2020

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

Please see attached letter as testimony provided by the Woodstock Neighborhood Association Land Use Committee

Testimony is presented without formatting.

Tabitha Boschetti

#144025 | June 3, 2020

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

More than anything, I encourage City Council to finally adopt this proposal! I support amendments 1 through 4 and 6. I am not crazy about Amendment 7; it seems unnecessary, and if a contributing resource is demolished, it would be better to have it replaced with a four-plex than a mansion. At the same time, if it's what it takes to finally pass this thing and get more attainable housing into production and on to the market for people to live in, Portland would still be better off with this as a compromise position than with no Residential Infill Project at all. A lot of strong work and community consideration has gone into this project; our housing crisis is more urgent than ever; act now.

Testimony is presented without formatting.

Marita Ingalsbe

#144026 | June 3, 2020

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

Thank you for the opportunity to comment. As you plan for ongoing data monitoring to support implementation of the RIP, please consider including these data points. 1. How many single-family homes have been demolished, and what have they been replaced with? 2. What percentage of residential property in the city is owned by non-residents? 3. How many large trees have been removed to allow for increased housing? 4. Have there been traffic increases in areas associated with increased density? 5. Has increased density in fact provided more housing affordability? Thank you for your work on this important initiative. Marita Ingalsbe

Testimony is presented without formatting.

Camille Cortes

#144028 | June 3, 2020

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

City Council, Residential Infill Project testimony, 1221 SW 4th Ave Room 130, Portland OR 97204.? RE: Testimony on the Proposed Residential Infill Project Dear City Council Members, I'm Camille Cortes, a local urban designer, and a member and representative of the Congress of New Urbanism, Portland Chapter. We are writing to give input on two key issues: Support for Amendment 7 - Historic Resource Demolition Disincentive Incentives for Adaptive Reuse and Internal Conversions need to be embedded in this package to make reuse a more economically and financially attractive alternative to demolition where we have existing functional housing. For point number 2, we urge that the Residential Infill Project include a package of incentives for adaptive reuse, against demolitions, and to promote greater equity and diversity among small developers in the housing market, such as: Legalize internal conversions immediately (prior to full adoption of the RIP, just within the regulatory framework we have now); Change the local version of the Building Code in effect to regulate structures containing up to four dwelling units under the residential building code (as opposed to Commercial); Work to provide financing and funding support including: low interest loans to qualified local developers; tax abatement to encourage adaptive re-use projects / internal conversions; and subsidies to encourage the inclusion of affordable housing in such scattered-site projects Fee waivers & reductions (permitting fee waivers & SDC reductions); Technical Assistance Program for internal conversions to actually help people do it (Feasibility analysis: grants & support, Inspections support, etc); Climate Impact Fee (on new construction & demolitions) - Credits for the value of embodied CO2; Kit of parts for developers and property owners to choose from, including expedited permitting & regulatory streamlining, and elements such as additional rated assemblies that can become common solutions to the issues that arise during the process of internal conversion in order to meet energy, sound, and fire codes; Anti-displacement programmatic approaches; Penalize "demolition by neglect". We support the intent of RIP and appreciate the amendment process, we hope our recommendations are taken into consideration in order to create a more effective and climate-responsive approach to preserving the history and culture of our city while adding needed housing diversity and the cultural/income diversity this supports. Camille Cortes, on behalf of the Congress for New Urbanism, Portland Chapter 1920 NW 26th Ave, Portland, OR 97210

Testimony is presented without formatting.

Margaret Davis

#144029 | June 3, 2020

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

I'm amazed this market-rate housing measure comes to the fore at such unprecedented times, but it does relate to issues on everyone's mind: inequality, and public health & safety. With rising income equality across America, we see increasingly dramatic gaps and treatment between the haves and have-nots. But here's how Portland leaders can make a difference, by voting no on RIP and allowing affordable housing to remain standing, and reused. Remember, RIP isn't about affordable housing—at the beginning of the project planners listed "affordable housing" as outside the scope. I wish you had an airhorn to sound when anyone intimates RIP will provide this. You will probably hear "affordable housing" repeatedly from RIP's backers, who have been recruited, sometimes hired, and bankrolled by out-of-Portland teardown builders such as Clyde Holland, a Washington billionaire (and btw, that state's no. 1 Trumper) whose properties include projects such as Premiere on Pine (in other words, not affordable housing). Worse, RIP incentivizes loss of affordable housing. When you offer a multiunit payout where a single-family house once stood, that house doesn't stand a chance. An example of RIP-type development: a teardown of a \$330k home at Northeast 63rd and Mason to build one more than twice as expensive. Except for extreme outlier instances, a newly constructed unit will never be as cheap as the one it replaced. This \$330k housing option is gone forever—many more buyers would be able to afford it than a \$685k house. A neighborhood is stronger for its diversity, of income and background. Moving to public health and safety, right now we battle something we can't see; we should also battle what we can see, toxic clouds of demolition dust. By BDS's own recent estimate, about 90% of demos go unmonitored for hazmat control. Right now a BDS subcommittee is meeting to give oversight of hazmat control to an employee of the teardown builder, so basically no change from the toxic clouds that spread 300 to 400 feet from the demo site. At least we'll have our COVID masks handy! If RIP passes, include a provision for teardown builders to replace yards dusted with toxic fallout within the 300- to 400-foot radius so people in the future can grow vegetables and let their kids play on the ground. There's no safe level of lead in children. Our schools struggle enough without more developmentally disabled kids to teach. I miss Commissioner Nick Fish—he worried about the effects of demolition dust on his kid. I hope you will honor his legacy, that concern. Why not wait for a full council and full public participation before approving a rezoning with such massive impacts, displacing more Portlanders, and exposing us to more toxins?

Testimony is presented without formatting.

Nate Ember

#144030 | June 3, 2020

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

I strongly support the Residential Infill Project for so many reasons stated by so many others and am grateful to live in a city addressing exclusionary zoning. I support all of the amendments with the exception of #7 due to income inequities and the fact that existing homes are nearly impossible to subdivide under the building code. I applaud the intention, but I don't see a means to achieve both historic protection and equity, therefore equity must win out. Thank you

Testimony is presented without formatting.



June 3, 2020 < sent this date via email >

City of Portland

Attn: Mayor Ted Wheeler & City Commissioners Amanda Fritz, Joanne Hardesty, and Chloe Eudaly < cctestimony@portlandoregon.gov >
1221 SW Fourth Ave.
Portland, OR 97204

Subject: RCPNA RIP Testimony Addendum requesting revision of Implementing Language from providing 80% MFI to 60% MFI for Residential Unit Price Range.

Honorable Mayor Wheeler & Commissioners:

On June 2nd the RCPNA Board reviewed and approved this Land Use and Transportation Committee recommendation on the Residential Infill Project. This document serves as an Addendum to previous RCPNA testimony on this matter. The Board agrees that a whole sale editing of the RIP proposal is needed to reflect the economic reality that our community is facing with COVID-19 impact on our economy. It is proposing that if RIP is implemented that it truly become a measure for affordable and equitable housing for the Portland area.

To do this, **all of the implementing language referencing 80% MFI should be changed to 60% MFI.**

The RIP being proposed now only perpetuates housing for those who can afford it at \$2.50 per square foot, based on the Johnson Economics report. Under the current proposal the average new residential unit, at 80% MFI, will contain about 730 square feet and cost \$1,823 a month.

The Portland Business Alliance Housing Affordability Report¹ states:

“Housing affordability and homelessness are linked. One unexpected expense can leave a household unable to pay the rent. Many households earning less than 80% of MFI are spending more than half of their gross income on housing alone, leaving little for other basic requirements like transportation, child care and food.”

It further points out that most families making 100% MFI are priced out of many neighborhoods as they could afford a \$385,000 house and still struggle to make payments.

¹ EMBARGO 02/12/2020; “2020 Value of Jobs Housing Affordability”; <https://portlandalliance.com/assets/pdfs/economic-reports/2020-VOJ-Housing-Affordability-WEB.pdf>

New apartments at 60% MFI are of the greatest need in the Portland area. The Residential Infill Project should focus on providing the most needed housing supply in Portland.

Please let me know if you have any questions.

Respectfully,

A handwritten signature in black ink, appearing to read "Tamara DeRidder". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Tamara DeRidder, AICP
Chair, RCPNA
1707 NE 52nd Ave.
Portland, OR 97213

CC: Alison Stoll, CNN

Tamara DeRidder

#144044 | June 3, 2020

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

Letter from RCPNA attached.

Testimony is presented without formatting.

From: [Council Clerk – Testimony](#)
To: [Commissioner Hardesty](#); [Eudaly, Chloe](#); [Fritz, Amanda](#); [Wheeler, Ted](#)
Cc: [BPS Residential Infill](#); [King, Lauren](#); [Rees, Linly](#); [Aiten, Herico](#); [Bradley, Derek](#); [Carrillo, Yesenia](#); [Eale, Ocean](#); [Pierce, Meeseon Kwon](#); [Washington, Mustafa](#); [Williams, Tia](#)
Subject: Testimony for RIP: FW: For Rowena Paz Norman Testimony on RIP 6/3/20
Date: Wednesday, June 3, 2020 4:23:09 PM
Attachments: [image001.png](#)

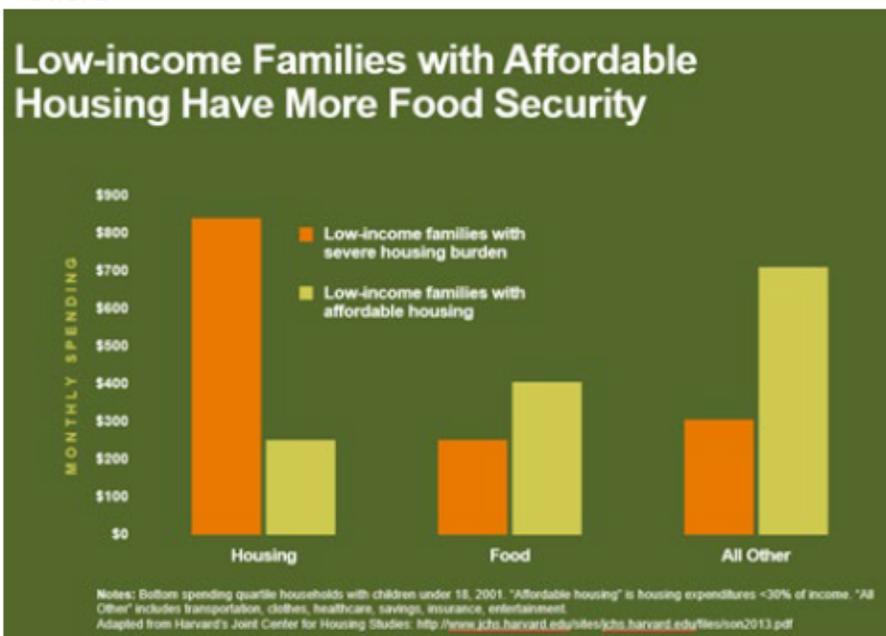
From: Rowena Norman <rowenanorman@gmail.com>
Sent: Wednesday, June 3, 2020 4:18 PM
To: Council Clerk – Testimony <CCTestimony@portlandoregon.gov>
Subject: For Rowena Paz Norman Testimony on RIP 6/3/20

Hi,

I will be referencing the below image in my testimony. Please share with council.

Harvard's Joint Center for Housing Studies that found that Low Income Families with Affordable Housing Have More Food Security.

-Rowena



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Rowena Paz Norman
RowenaNorman@gmail.com

Rowena Paz Norman

#144052 | June 3, 2020

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

Email with graphic attached.

Testimony is presented without formatting.

From: [Council Clerk – Testimony](#)
To: [Commissioner Hardesty](#); [Eudaly, Chloe](#); [Fritz, Amanda](#); [Wheeler, Ted](#)
Cc: [BPS Residential Infill](#); [King, Lauren](#); [Rees, Linly](#); [Aiten, Herico](#); [Bradley, Derek](#); [Carrillo, Yesenia](#); [Eale, Ocean](#); [Pierce, Meeseon Kwon](#); [Washington, Mustafa](#); [Williams, Tia](#)
Subject: Testimony for RIP: FW: Testimony in Opposition to RIP
Date: Wednesday, June 3, 2020 10:41:06 AM
Attachments: [RIP 6.3.20.docx](#)

From: James Peterson <customwoodworking@msn.com>

Sent: Wednesday, June 3, 2020 10:32 AM

To: Council Clerk – Testimony <CCTestimony@portlandoregon.gov>; Wheeler, Mayor
 <MayorWheeler@portlandoregon.gov>; Commissioner Fritz <amanda@portlandoregon.gov>;
 Commissioner Eudaly <chloe@portlandoregon.gov>; Commissioner Hardesty
 <joann@portlandoregon.gov>; jim.rue@state.or.us

Subject: Testimony in Opposition to RIP

Portland City Council
 2121 SW 4th Ave.
 Portland, Oregon 97204

RE: Testimony Opposing the Residential Infill Project

The 2035 Comprehensive Plan complies with all requirements of HB 2001 without the Residential Infill Project. The proposed model code for HD 2001 defines a duplex as being a lot with two units. Thus a lot house with an ADU is considered a duplex.

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.

Thank you,
James Peterson
2502 SW Multnomah Blvd.
Portland, OR 97219

Sent from [Outlook](#)

James Peterson

#144055 | June 3, 2020

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

The 2035 Comprehensive Plan complies with all requirements of HB 2001 without the Residential Infill Project. The proposed model code for HD 2001 defines a duplex as being a lot with two units. Thus a lot house with an ADU is considered a duplex. 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.

June 3, 2020

Re: Opposing Testimony Residential Infill Project

The Multnomah Neighborhood Association appealed LCDC decision on the Middle Housing Policy 5.6 of the City of Portland 2035 Comprehensive Plan to the Oregon Court of Appeals. Oral arguments occurred on January 9, 2020. Audio at <https://youtu.be/W04-eoPi7Co> Details of the MNA Appeal are posted at <https://swni.org/multnomah/land-use> . Unfortunately the court affirmed without opinion. On May 27, 2020 the MNA petitioned the Oregon Supreme Court to hear the Appeal. The likely outcome will be that the Middle Housing Policy will be remanded back to the city for adequate public hearing with a factual basis. The implementation of the Residential Infill Project will have to go through periodic review. For this reason the project should be placed on hold until the Oregon Supreme Court makes their ruling on the Middle Housing Policy.

SB 100 is the foundation of the great land use planning we have in the state of Oregon. It formulated our Land Use Goals and is the basis of all land use laws and planning in Oregon.

The redefining of the zoning of 87,324 single family zoned properties to allow for multiple units in the Residential Infill Project is not need and has not been justified. The 2035 Comprehensive Plan at the time of adoption is required by ORS 197.296 to have a 20 year housing supply of all housing types in order for it to be acknowledged by the state.

In the 2035 Comprehensive Plan City of Portland is planned for projected growth of 124,000 housing units with some flawed assumptions. Metro used a capture rate of 72 % in their 2035 forecast, when their historically the capture rate has been 62 %. That is 8.6 % higher rate than has ever been achieved. The City of Portland decided to capture 60% share of the new housing units within the Metro UGB. The largest share of housing units that the city of Portland has achieved has been 36%. Thus the more likely number of housing units should be 68,000 housing units. The city of Portland has been averaging 2,700 housing units per year. The best years of 2003 and 2014 it produced a little over 5000 units. This is far from the average of 6,000 housing units it would take to get to 124,000 housing units.

It should be noted that Clark County Washington has been producing close to the same number of housing units with 56% of the growth out side the UGB. Most of the housing units planed in the Portland will be apartments and condos. The 2014 Housing Preference Study found another flaw in Portland's plan because 80 % of respondents preferred single family detached housing. Will Portland's growth then happen in Clark County?

Zoned capacity is not Greater Portland's challenge as Metro and city planners stated in last year legislative hearings on SB 10 in Salem. The Metro UGB has zoned capacity for approximately 1.3 million total homes; far more than are likely to be built in coming decades.

RIP does not have an adequate facilities plan to accommodate the increase capacity RIP will create as required by Oregon's Land Use Goals

Since the proposed model code for HB 2001 defines duplexes as two units on a lot the 2035 Comprehensive Plan comply with requirements of HB 2001 without the proposed changes in RIP.

The best way to create more affordable housing would be to re-zone some of the single family zoned property around centers and corridors to Multifamily. This would allow wood framed apartment or condominium complex's to be build where there is adequate transit and infer structure. Building 20 or 30 units in one project would have significant cost savings over building projects with 4, 6, or 8 units.

Here is a link to a program that was recently on KBOO <https://www.kboo.org/media/78498-15-tripp-p-24jan2020> detailing the flawed assumptions of RIP.

James F Peterson
Multnomah
Land Use Chair
2502 SW Multnomah Blvd
Portland, OR 97219

James Peterson

#144056 | June 3, 2020

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

Letter from Multnomah NA attached.

Testimony is presented without formatting.