

Better Housing by Design Discussion Draft

ALL Comments

Diverse Housing Options and Affordability

1. Regulate development intensity by the size of the building, instead of numbers of units.

Support:

- The revision of the residential zones, including moving from a framework based on units to one based on Floor Area Ratio (FAR) is a welcome change. Likewise the opportunity to increase FAR and transfer development rights for affordable housing. I encourage BPS not to decrease the effectiveness of the affordable housing bonus by providing too many other options to obtain the bonus. (ROSE CDC)
- I believe that the shift from a unit based density limit to an FAR density limit will encourage a greater variety of housing types and allow for innovations that cannot occur under today's code.
- We support staff's move towards a FAR-based code for multi-dwelling zones. We agree that this will allow greater flexibility, open up housing choices, and re-legalize many desirable building types that are currently outlawed. (Portland for Everyone).
- The Panel supports the shift to regulating density by total floor area rather than by the number of units. This has the potential to be a game changer by allowing much more flexibility in how units are designed and configured on a site and making it much easier to provide a mix of affordable and market rate housing (UDP).
- East Portland's diverse families need a housing supply that meets their culturally-specific needs. In particular, recent immigrant families in East Portland have difficulty finding homes with adequate bedrooms for their larger families and their traditional multi-generational family structures. To date, the City's production of regulated affordable homes has been dominated by smaller units, thereby offering little to these families. By measuring affordability incentives by space instead of units, we believe that developers will be more likely to work to accommodate this unmet need (EPAP support)
- RNA supports as written. (Richmond)
- We support the switch to FAR for all zones within the multi-family zones, especially with the inclusion of a bonus structure/incentive for family-sized units (PCRI).
- I support the proposal to regulate development intensity by building scale (FAR), not number of units.
- Moving to a FAR-based code is great. Thanks!
- I'm writing in support of the changes to the R2 zone as proposed by the comment draft currently available for public view. As a homeowner living in an R2 zone, I welcome the flexibility the proposed language allows especially with regard to internal conversions that will enable the addition of discreet units of housing in the community. I, for one, have already built an ADU, and would really like to convert my basement into an additional unit, which is currently not allowed. This does not make sense, especially given the tight housing

market and the increasingly unaffordable rents in the Portland area. My house contains more space than my family needs, and by changing the R2 allowable uses, I can convert this space into an affordable home for another member of the community, while also increasing the financial stability of our household. I welcome any opportunity to clarify any of the above and look forward to a speedy adoption of this amended code.

- This is a great idea!
- I strongly support the change to an FAR based system. Regulating overall building mass and floor area, rather than unit count, is a more equitable approach and will result in more housing options in Portland. An issue with the current proposal is the lack of flexibility – the code is over constrained and does not leave enough room for projects to be designed around the unique nature of each site. With the addition of FAR limits addressing bulk, the related pre-existing code sections (max height, building coverage, etc) should be somewhat relaxed from where they are currently, without an FAR limit. Increase the maximum height and building coverage, and reduce the side setbacks wherever possible to allow some flexibility in where the FAR is used. Doing so will increase the number of viable projects, and therefore housing units in the city. It will also result in a more dynamic urban form. Where the maximum allowable floor area nearly fills the full buildable envelope (building coverage x allowed stories) the resulting developments become boxy, with little variation between level. This effect is clearly illustrated on page 6 of the staff report. Increasing height and building coverage allows project teams to vary the building height on the site to respond to the context and/or place the building footprint to preserve natural features such as heritage trees. The City needs to increase housing supply and housing affordability – increasing the allowable scale of projects within the multi-family housing zones should be a piece of this proposal.
- The Sullivan's Gulch Neighborhood Association (SGNA) supports this approach with the caveat that some allowance is made for neighborhoods to affect design using guidelines developed to ensure a level of compatibility with prevalent neighborhood design characteristics.
- I strongly favor this. This is important to increase the supply of housing to meet the demand. The allowable FAR should be higher in order to create more of an incentive to build more units.
- This is a great idea
- Good

Support, but need greater development allowances:

- Second, the proposed changes to regulate building intensity and not "number of units" is welcome, as are provisions that are sensitive to street classification. Unfortunately, there's a great deal of R1 zoning (now RM2) on major corridors (especially in inner neighborhoods), and this zone is woefully under-entitled relative to nearby (often adjacent) CM2 sites.
- I support any moves towards a Form-Based Code. While I think it's foolhardy to spend more on this particular contract than it would have cost to implement the free SmartCode citywide, while we've already committed ourselves to this senseless waste of resources, let's at least make the most of it. Therefore, I support the shift from regulating number of units to regulating FAR. However, the FAR numbers used need, in general, to be higher. RM-2

- zones adjacent to CM-2 zones on a commercial street should have the same FAR as the zones right next to them. If you need to create an overlay to allow for higher FARs along transit corridors, then please, do so. However, FAR maximums likely should be increase across the board for all zones.
- I support many of the concepts in the Better Housing by Design proposal, especially the choice to regulate the RM1 and RM2 zones by FAR, rather than the current “unit density” regulations. The current densities were thought appropriate in 1959. Now, 60 years later, we cannot as a region or a planet, afford to have such low-density housing along major transit corridors, within walking and biking distance of jobs, services and other daily needs. It is critical to set the FARs high enough to result in a significant increase in unit numbers to accomplish the Comp. Plan goals for affordability in every neighborhood and to have compact development that reduces Vehicle Miles Traveled and transportation emissions, to meet our Climate Action Goals. I would say that these goals should over-ride concerns about “giving windfalls to property owners” or other secondary unwritten policy considerations. Agree with concept, but increase Base, Bonus and Deep Affordability as per my “High Opportunity Area Overlay” proposal, or by the “Outside the overlay” increases listed immediately above. Maximum height in RM1 should be raised back to the 40’ now allowed in R-2, for more flexibility in design. This is a 5’ step up from R-2.5, and 5’ lower than RM2, so forms a transition.
 - “High Opportunity Area Overlay”: This overlay would apply to all lots abutting Frequent Service Transit Streets and Streetcar lines, as well as on all Major City Traffic Streets and Collectors within 500’ of Light Rail Transit Stations, and it would apply in those locations that are in the RM1, RM2 and RM3 zones. Within this Overlay:
 - Increase FAR in RM1 to: 1.5:1 Base FAR, 2.5:1 Bonus FAR for IZ and 3:1 FAR for Deep Affordability,
 - Increase FAR in RM2 to: 2.5:1 Base FAR, 3.5:1 Bonus FAR for IZ, and 4:1 FAR for Deep Affordability,
 - Increase FAR in RM3 to: 3:1 Base FAR, 4:1 Bonus FAR for IZ, and 5:1 FAR for Deep Affordability, Increase Maximum Lot Coverage in RM2 from 60% to 75%, (and to 85% for Deep Affordability.)
 - While outdoor area requirements would still apply, they could be accommodated above grade, or on balconies, Increase Minimum Unit Count in RM2 to “1 unit per 1,000 Sq. Ft.” (yes, that’s the old maximum), and in RM3 and RM4 increase it to “1 unit per 750 sq. ft.”. Do not allow detached houses in these zones in the Overlay. Ideally, rowhouses should also be discouraged on these Corridors, Increase Maximum Height in RM-2 with Bonus and/or Deep Affordability from 45’ to 55’. This will be necessary if FARs were increased, to take full advantage of that increase.
 - I am a resident in HAND near Ladd’s Addition, and I support zoning changes which increase population density at the expense of most other objectives. Raise height limits. Rezone to allow more units. In particular, parking is one of the worst possible uses of space. I don’t necessarily have a strong opinion on how much of a lot is used. If a developer wants to use all of their lot and have no space for gardens or other common areas, that’s fine with me as long as they aren’t building single-family McMansions. Again, density over parking, density

over existing zoning laws, density over NIMBYist objection. Thank you for the opportunity to provide feedback.

- For your Better Housing by Design project, please consider giving much higher priority to allowing increased housing density. Specifically, it would be best if you completely eliminated all parking requirements, all mandatory setbacks, and any other mandatory features such as courtyards that unduly restrict housing density. We're in a housing crisis, and regulations like these are a major reason why.
- I like Doug Klotz/Pdx Yimbys' suggestion: Create a "High Opportunity Zone Overlay" for RM2 and RM3 lots Abutting High Frequency Transit streets or within 500' of Transit stations. Within that Overlay: Increase FARs: RM2 from 1.5 Base, 2.25 IZ Bonus, 3.0 Deep Affordability, to instead: 2.5:1 Base, 3.5:1 IZ Bonus, 4.0:1 Deep Affordability RM3 from 2:1, 3:1, 4:1, to instead 3:1, 4:1, 5:1. Increase height with Deep Affordability for RM2 from 45' to 55' to accommodate the FAR
- The proposed RM1 is even woefully under-entitled relative to nearby CM1 sites (on Belmont in the 50s, for example). Three possible approaches to rectify this: increase the FAR entitlement in every zone, codify a separate FAR entitlement (not a bonus, so not tied to the maximum bonus limits) specifically for properties with a certain amount of frontage on streets with specific classifications, or simply make map changes on every corridor to be more compatible with the CM1 or CM2 entitlements. If you're going to consider map changes, and I think this project should, you should also evaluate areas in inner neighborhoods with substantial non-conforming development due to urban form or density including the Brooklyn, HAND, and Buckman neighborhoods.
- All the FARs, both the base and the bonuses, as well as max. heights and max. lot coverage, should be higher, especially in Corridors and Centers, with frequent transit and near shops and services. Increase "Minimum Density" in RM1 through RM3 by 50% over the proposal, and by 100% (double) in RM4.
- There are way too many restrictions on building size in the proposals. The buildings should be allowed to be the size the market demands to ensure adequate housing is being built. These FAR restrictions should be done away with.
- Fine. Limiting building size is better than limiting the number of homes--but I would prefer that "intensity" not be regulated. Instead, just make sure development is safe and adequately supports walking, biking, and transit.
- There are several locations in the city where R-2 is proposed to become RM1 in the Better Housing by Design project. I suggest that many of these locations, along Transit Corridors and near or in commercial areas, are good candidates for being rezoned as RM2 rather RM1. The higher intensity zone is appropriate for these locations, which will allow more new residents to take advantage of the well-served locations, helping affordability and reducing carbon emissions.
- Upzoning certain places along key corridors would both support Comprehensive Plan goals and complement the surrounding context. Staff should revisit those places where lower-density RM zones are mapped adjacent to medium-density CM zones. One option could be to create an overlay that gives greater development allowances for RM2 and RM3 lots abutting high frequency transit and existing commercial hubs. These areas could be defined as all Neighborhood and Civic Corridors. Also upzone existing R-2 in areas on or near transit

streets to RM2 to take advantage of the opportunity there. Some locations for this change include: Between NE MLK and 7th, from NE Thompson to Fremont, Between NE Glisan and Sandy, and NE 30th and 32nd, SE Division between 50th and 77th, and SE Francis to SE Powell, from 41st to 43rd. (Portland for Everyone)

- We would encourage staff to explore the opportunity for increasing opportunities along and within proximity to transit corridors by shifting current R2 zones to RM2 zones with the code update. These exist often in the Interstate URA, which currently have high opportunity for affordable housing development thanks to current funding streams, such as along the Martin Luther King Jr Blvd corridor, Albina/Mississippi corridor, and Interstate Avenue corridor. In general, we again encourage staff to consider the many push-pulls that exist in affordable housing. Not only are we responding to code requirements, but we also having funding requirements and programming goals that must be met as well. With every additional layer of requirements, the harder it becomes to make affordable housing projects pencil. The most flexibility you can provide our projects, the better. **(PCRI)**
- The elimination of the R2 zone and its replacement with the RM1 zone is a significant reduction in building potential. First, the reduction in height from 40' to 35' eliminates the possibility of building a 4 story building and compresses the possible ceiling heights in the more typical three story building. SEcod, the 1:1 FAR reduces the amount of building area to less than can be built under the present code, even if it allows a greater variety of unit sizes, The present building height and coverage limits would allow a three story building of 15,000 sq ft or an FAR of at least 15:1 – 50% greater than proposed, This would allow five 3000 sq ft units, or by using the amenity bonuses, seven smaller units. While this is not the typical type of units being built in the R2, it is allowed, and we are building something similar. I have attached an illustration of a building we are about to start building on 9300 sq ft in the R2 Zone. It contains six units and a total above grade area of 14,000 square feet for an FAR of 1.5

Limit density/small units:

- In the RM1 zone, allow a maximum density of 1.2 dwelling units for each 1000 square feet of land in addition to applying the FAR limit. The current proposed FAR with no density cap opens the door to the possibility of ten 500sf units (and ten cars!) on a 5000sf lot. This would not benefit those in need of family sized apartments and negatively impact adjacent single family properties.
- Allow a maximum of twenty percent of the units in buildings in the RM1 and RM2 zones to be studio and micro apartment housing types. This would provide more housing choices and also reduce impacts on adjacent single family neighborhoods.
- In RM3 and RM4 zones, allow a maximum of twenty percent of the units to be studio or micro units unless the property is on a high frequency transit line or within a quarter mile of a MAX station. Allow a higher percentage in mixed use zones. Again, the rationale is to provide housing choices and neighborhood protection.
- Extreme density increase: We believe that the number of units allowed should be limited. We previously proposed retaining existing limits on market rate units and allowing additional affordable units. Our neighborhood presently has a 4 story 30-unit building on a 3080 sf lot zoned RHd in permit review (5603 SE Milwaukie, see attached floorplan). It has footprint of about 2200 sf which can fit on proposed multifamily-zoned lots with 5000 sf or

more, about 950 or 73% of multifamily-zoned lots in our neighborhood. Using this as a template for a building on a 5000 sf lot, a two story 15 unit building in the proposed RM1 zone and a three story 25-unit building in the proposed RM2 zone, and possibly greater, are feasible on 5000 sf lots with the base FAR. Present zoning would allow a maximum of 2 and 5 units, respectively. Thus the proposal would increase zoned density at least 5-8 fold. In addition, we have one private RH project now in review that is 100% affordable housing and would qualify for the double FAR bonus (5434 SE Milwaukie, 4 stories, 28 units, 1835 sf footprint, see attached site plan). Because private development with 100% affordable housing is feasible in our neighborhood at present, the bonuses for only 50% affordable housing would increase density on some lots 10-16 fold. The zoning code (Title 29 -- 29.30.290) requires a minimum unit size of only 100 sf for single-room occupancy development allowed in RM2, RM3 and RM4. This level of development, now happening in Seattle, would increase density much more. We have learned to expect that allowed density will happen – when 45-foot-tall mixed use buildings were first zoned for our neighborhood it was commonly but incorrectly assumed they would never be built. Some of the BHD proposals listed below would favor construction of high density apartments in multifamily zones compared to mixed use zones. BHD does not acknowledge or recognize that such high density development is possible. For the RM1 zone, the maximum density shown in the staff report is a fourplex, not a 15- or 28- unit apartment building. Ongoing development in our neighborhood shows that 4 story 28 unit apartment buildings on 5000 sf lots would be feasible in the RM1 zone with the maximum bonuses which are given for only 50% affordable housing (the existing project is 100% affordable). For the RM2 zone, a 27 unit building on a 15000 sf lot is shown, only about one-third of the feasible density under the proposed rules. Much denser single-room occupancy development is not portrayed in the RM2 zone. BHD should accurately portray possible development under the proposed zoning rules. The maximum number of units should be provided using fire and building standards. If BHD assumes there is a practical limit to the number of units built in a zone (such as the fourplex shown for RM1), it should be codified as the maximum allowed density, similar to what the Residential Infill Project has done. We are concerned that the extremely dense development this proposal would allow would increase traffic and parking congestion near our corridors which would reduce the viability of small businesses, increase crowding in our neighborhood schools, hinder emergency vehicle access, and reduce vehicular, pedestrian, and bicycle safety (especially along narrow streets). The Report states “Proposed code changes will help ensure that new development in the multi-dwelling zones better meets the needs of current and future residents, and contributes to the positive qualities of the places where they are built” (bottom page 2). BHD should consider and evaluate the cumulative impacts of proposed increased density and ongoing development throughout our neighborhood. (SMILE)

- If you looked at the pictures of the missing middle housing examples on page 20 of the discussion draft or walk the Irvington streets between Tillamook and Broadway, you will see many examples of the missing middle, because the IHD historically allowed such duplexes, triplexes, fourplexes, 3 story apartment buildings, and courtyard apartments. BHD wants more of what the IHD already has, but will BHD as proposed caused such housing to occur. The discussion draft does not acknowledge that high density development is possible with

FAR, such as the 500 square foot example discussed above. A good example of what we do not want, if the goal is the missing middle, is another 4 story apartment building like the one located at 15th and Hancock, built before historic review, which has forty three 450 sq. foot apartments with no elevator, no air, and no parking. Such building does not provide missing middle housing. BHD, like RIP, has aspirational hopes that the proposed changes will cause developers to build MM housing, but the market will dictate what happens. If small high density units are selling, that is what will be built. We want a thorough review of adding minimum unit size and maximum number of units that will in fact produce the housing BHD wants. We do not know what those numbers should be. The next draft of BHD should accurately portray possible developments under the proposed zoning rules, and the maximum number of units that could be provided using the applicable setbacks, heights, lot coverage, and fire and building standards. Other reasons to zero in on unit size and number of units is that extremely dense development, as allowed by BHD, will increase parking congestion in MF zones. Along the Broadway and NE 15th corridors, each with frequent bus service, no parking is currently required within 500' of the bus routes. That extends into the neighborhood to roughly half-way between Hancock and Tillamook. Unfortunately, historic review says nothing about parking availability for multifamily housing. In fact, the multifamily structures built between 1910 and 1948 (of which there are quite a few in the IHD) generally did not have parking provided. Another comment about FAR issues. Please note that the two RH zones, now RM3 and RM4, have FARs of 2 to 1, and 4 to 1, respectively. We have argued during this 5 year Comp Plan process for no more than 2 to 1 FAR for the RH zone in the historic district. We were mostly successful except for the five half blocks zoned RM4 in green (the Central City portion of IHD) on the attached map. We would like to see a change to 2 to 1 for the RM4 zone; the higher the FAR the more pressure put on surrounding areas to be similar. (Irvington)

Against:

- This is problematic as the number of units has huge impact on the surrounding neighborhoods. Number of units should be linked with at least one off street parking space per each unit.
- This is absolutely unacceptable. What is the point of different zones if density is unregulated? This has a drastic impact in the R1 zone (effective July 2018) where I was able to afford a single-family detached home. Currently a 5-unit apartment building could go in on either side of me, and I'm at peace with that. Under the proposed rules, 60 micro-apartments could go in. My strong objections to that aside, it's also unwise from an infrastructure standpoint. Can our street and sewer systems handle this growth? In my particular R1 zone in north Westmoreland, groceries and other goods and services are well outside walking distance, which means people are still going to drive and own cars. This proposal needs to have a density cap, or be abandoned entirely. Redrawing residential zone boundaries would have been a better approach to the housing crisis, instead of corrupting well-understood, well-located zoning designations.
- Number of units more important

Other:

- Naming of Zones – I support the general direction of changing to a system where the denser zones have higher numbers (R3 is denser than R1), and I would encourage looking at doing something similar in the present single family zones. However, I think it would be better to name the multi-family zones RM1, RM1.5, RM2, and RM4, so that the allowed FAR is explicit in the name.
- SGNA is concerned that the form-based design requirements, while meeting the need for clear and objective standards so that the new development in RM1 and RM2 zones may be reviewed under a Type 1 approval process, do not provide sufficient guidance to ensure that new development is compatible with existing development themes and patterns in our neighborhood. We would like to see some language introduced into the code that references acknowledged City design guidelines that are contextual to the character found in different parts of the City. Such guidance should not be proscriptive with regard to building style, materials, color, etc. They should allow for diversity and experimentation but with an eye toward compatible development forms. In our inner-northeast neighborhood, for example, the design guidelines that the City adopted in the Albina Plan would provide a good starting point for a set of flexible guidelines that would be suitable in most of inner NE and SE Portland. We would like to work with the City to develop such guidelines as a way to encourage designers/developers to seek compatibility with prevalent design characteristics.
- Yes, and size of building should also relate to the width of the street. Too many of our street corridors have turned into canyons. Build in requirement to step back upper floors from the lower floors to let more light into the street & sidewalks.
- I don't think it's a good idea to limit design possibilities based on size as an absolute measure. I realize people have concerns about trying to maintain a certain character of a neighborhood, but on through streets, I don't think worrying about height restrictions and such matters is important, rather, I like density.
- Emphasize smaller, affordable units regardless of building size.
- I don't think we should necessarily limit either. We have a housing affordability crisis. Millennials will never be able to afford housing in Portland if we don't build more.
- BHD fails to consider that the minimum density in RM1 could allow an oversized single family home, a "McMansion." Under the proposed rules, an oversized single family home with an ADU could meet the minimum density rule on a 5000 sf lot in RM1. BHD should close this loophole.
- Build provisions into the code conditions, and requirements for diverse housing options. Past experience is no indicator of future development patterns. The diagrams in the Discussion Draft shows a variety of building types—courts, rowhouses, plexes, etc. Provide code directions and regulation to achieve this vision.
- Include incentives for diversity and neighborhood compatibility.

2. Require higher-density development to include visitable units with physically-accessible ground levels (20 percent of all units).

- Visitability is a worthwhile goal and far too little of the housing built today in Portland is accessible to people with disabilities. There are costs associated with this requirement and waivers should be available for sites that are unsuited to visitability, for example ones with steep slopes. (Nick Sauvie)

- We have a growing need for affordable housing citywide that accompanies the lack of accessible housing. However, the creation of affordable housing that comes at the expense of accessible housing (e.g., “we can’t make it pencil when building to accessible standards”) is an inequitable approach to housing people who are facing multiple barriers to housing. Please continue to explore the costs and benefits of residential elevators (i.e., not commercially permitted elevators). In addition to design that may allow future elevators to be installed (e.g., stacked closets), please explore opportunities for incentivizing the building of new and/or retrofitted multi-dwelling units that can accommodate residential elevators. Research is needed to understand the existing accessible housing stock in Portland. This will lead to understand how inadequate the supply is – note: anecdotal information suggests that it is very difficult to find accessible housing in Portland; especially affordable housing that is accessible. To date, the City of Portland has not been able to identify the accessible housing stock and, therefore, policymakers and community stakeholders are unable to understand existing needs and to prepare for solutions. (DeLaTorre, PSU)
- First and foremost, the efforts to advance visitability, accessibility, and environments that are good for people of all ages and abilities are noted as a “step in the right direction” and in line with the Portland Plan (see: Portland is a Place for All Generations) and the Comprehensive Plan (see policies under following sections: Urban Form, Design and Development, Housing & Transportation). The Discussion Draft advances important guiding principles pertaining to older adults and people with disabilities. We hope that testimony from the developers and other community stakeholders interested in maintaining extant policies does not lead to less effective age-friendly policies and/or the elimination of the visitability provisions in the Discussion Draft. I support the policy recommendation for visitable units and suggest that the City consider this policy a starting point for future efforts to increase housing accessibility. I also suggest continuing to explore ways to require and/or incentivize accessible and universally-designed housing and environments. With respect to visitable bathrooms, although the 60-inch turning diameter is a preferred standard (in fact, some electric wheelchairs should have 70+ inches to be accommodated), T-turns should be explored as a reasonable trade-off when considering small units sizes and housing affordability. Zero-step entries and critically important for providing access for older adults, people with disabilities, cyclists, parents, and just about everyone else. This is a provision that should be considered critically important for all housing moving forward. This single environmental barrier is insurmountable by some people. (DeLaTorre, PSU CUPA)
- We ask staff to consider: Accessibility minimum requirements should be triggered at three units, rather than two (or require 20% of homes be visitable for projects exceeding one unit per 3,000 square feet of site area). This would ensure that there is not an outsized impact on small project costs. Mirror height measurement procedures proposed in the Residential Infill Project for multi-dwelling zones. This would create better consistency across Portland’s zoning code. There are competing and incompatible standards proposed on p.21 & p.41 regarding setbacks and visitability requirements: If a developer opts to raise the ground floor 2’ to improve privacy and access smaller setbacks, they would likely no longer meet the minimum accessibility requirement for a zero- or one-step entry. Similarly, stormwater management requirements become much harder to meet when accessibility requirements for small projects will result in ramps or other additions to impervious surfaces. We

recommend adopting standards for building specifications that will allow for future adaptability, rather than requiring all projects to meet stringent standards upon construction (Portland for everyone).

- RNA supports as written.
- We propose that the baseline trigger for requiring visitable units be increased to better spread the cost implications across units – ideally one unit per 3,000 square feet of site area. This baseline should also consider when this might trigger the requirement for elevators on projects that would not otherwise need to provide them – a substantial cost impact for small to medium sized projects. The exemption language should also include language mirroring the Residential Infill Project’s visitability code language. Specifically 33.405.060.C.2 – however, we did suggest to RIP staff that the slope be 7% as opposed to 10% based on site case studies we conducted. We also requested that it be clarified if “nearest right-of-way” is inclusive of alleyways – as it seems that this would not meet the purpose of the standards if it is. Visitable bathroom: Requiring “a 60-inch diameter circle with no obstructions” combined with FAR and lot coverage limitations creates a spatial challenge for compact designs that have limited space on the ground floor. Instead, we would recommend exploring opportunities for other visitable bathroom standards, such as the “hammerhead” pivot standard, and/or reinforcement in walls next to toilets for future installation of grab bars. Cost implications: while we don’t have the capacity to do an intensive cost implication of these standards ourselves, we encourage staff to look into this further and consider the potential cost burden on non-profit developers who cannot simply pass-through costs with increased rents or sale prices. Of specific concern are increased concrete work needed for retaining walls if a ramp/accessible route is being constructed in lieu of stairs, and meeting stormwater requirements if constructing a ramp where permeable pavers aren’t an option (this can translate to needing to use permeable concrete which comes at a higher cost than standard concrete, and/or a larger drywell which impacts cost and buildable area for a project). There are competing incentives/requirements between the required visitability and the option to reduce the setback in RM2-RM4 if the ground floors are raised 2 feet above sidewalk level. We would suggest the baseline setback be reduced to 0/5-ft vs 5/10-ft in RM2 and RM3, and a 0-ft setback in RM4 to better respond to these competing values. We would highly recommend staff look into the placement allowances for ramps and landscaping/screening requirements and setback requirements and how this impacts building design, access, and number and placement of units on the ground-floor (PCRI).
- I offer my comment/perspective as a private citizen, not as a member of the Portland Commission on Disability. The draft summary emphasizes “How can Portland multi-dwelling zones be improved to meet the needs of Portland’s current and future residents?” I would add “ALL Portland’s current and future residents.” The concept of universal design emphasizes creating spaces that everyone, regardless of age, size, or ability, can live in or visit, even as EVERYBODY’S NEEDS AND ABILITIES CHANGE.” (No one over 40 has ever told me that their bodies are improving as they age.) I believe that ease of access is also an equity issue. If code allows a one-step entry, these spaces are not accessible to many people: e.g., people with permanent physical disabilities; parents pushing children in large strollers; people temporarily “disabled” due to medical surgery; moving large items into and out of a space. No-step entries ensure that spaces are 100% accessible to everybody and

EVERY BODY. No-step entries provide Best Practices design: practical, equity for all people; and increase of the demographic of people who will buy these properties.

- The new requirement for visitable units has merit, but it needs more work, again to make it work in the context of the missing middle. Visitable is not ADA. Visitable units could have ground level accessibility, but upper level bedrooms.
- I support this.
- While requiring visitable units is a commendable goal, the 20% requirement may place a significant constraint on some projects, especially small ones. Has this figure been analyzed to determine its viability? (UDP).
- Good!
- I support this proposal – more accessible housing is needed and is a benefit to everyone. Allowing a single step in is a practical way to mitigate building durability issues while allowing the possibility of adding an accessible ramp entry.
- YES - there are many, many sites where this would not be difficult. All developers should be doing this as standard practice.
- This is a good idea
- SGNA supports this proposal.
- Great idea
- I'm not moved by this incentive.
- I would prefer to provide incentives rather than have a static requirement. This requirement would also punish projects that provide more homes under a smaller footprint, which is counter to our land use goals. It would also potentially increase the cost of homes, which is counter to our affordability goals.
- I agree with this
- If what is meant by this is that a certain number of units ought to be easily livable for folks with disabilities, then yes, I support this idea.
- 20% minimum; could be higher. Universal, accessible designs should be rewarded.
- This is a bad policy. It will essentially limit the height. It is another way to meet that same end. We should be encouraging building high as it will provide more housing and less sprawl.
- Good

3. Prioritize affordable housing by:

- Increasing the inclusionary housing bonus to 50 percent above the base FAR.
- Providing a higher-level of development bonus (100 percent additional FAR) for projects with deeper housing affordability.
- Provide a development bonus of 25 percent for moderate-income family housing (three-bedroom units).
 - The 50% bonus FAR, the 50% of units threshold for units up to 60% of Median Family Income (MFI), and 25% bonus for moderate-income family housing are valuable improvements (ROSE CDC)
 - SGNA supports the proposed FAR bonus proposal provided that it affords no alteration to the height limit or coverage ratio of buildings without going through an adjustment process.

- 1. The property which is the source of the density bonus should remain affordable for 99 years from the date of construction with a minimum of 25 years of affordability. Some buildings do not have a useful life expectancy of 99 more years. This would still provide the bonus for assured affordability for a reasonable length of time 2. Do not allow the application of . FAR bonus in the RM1 zone. This would assure the RM1 zone remains transitional in scale, provide protection for neighboring single dwelling properties and helps retain older, classic court style apartments and other smaller structures.
- Allow bonuses for deeper affordability and three-bedroom units to be utilized together (rather than separately, as proposed) for maximum benefit to lower- income Portland families Consult affordable housing development experts, including public funders such as PHB and OHCS, on how fully realizing the deep affordability bonuses may be limited by funding sources. Although LIHTC funding does roughly scale with total development cost, local gap funding sources are often limited to fixed amounts - thereby making additional development in LIHTC funded projects unlikely even with increased density allowances. Consider the implications of layered requirements (such as outdoor space and where it can/can't be located, landscaping requirements, parking, setbacks, etc) on the ability to meet the many other demands on affordable housing projects. Funding is typically prioritized only for the housing units themselves. Although shared amenities may provide quality of life benefits and other positive impacts for a development project, too many prescriptive requirements can limit a project's ability to respond to competing priorities among codes, funders, and others. BPS staff should consult with PHB staff and other affordable housing development experts to better understand this dynamic. (Portland for Everyone).
- While we did not take a position on the density bonus provisions, they appear to be generous enough to achieve the goal of producing significant new affordable units. It would be ideal to test the thresholds through an economic analysis to see what their likely impact would be in combination with the inclusionary zoning requirements (UDP).
- SMILE continues to believe that any increase in zoned density in our neighborhood should be dedicated to affordable housing. Previously we advocated for retaining the existing maximum density limits for the R1 and R2 zones and allowing a 100% unit bonus for affordable housing. This was not adopted by BHD; perhaps the affordable housing bonus should be greater to make this proposal feasible. Our proposal would provide needed affordable housing rather than additional market rate housing and allow increased housing diversity. If our proposal is not feasible, we invite a dialog on the concept and how to make it feasible. In our neighborhood, 5434 SE Milwaukie is a 4-story 28 unit private RH development in review that is 100% affordable housing and has only a 1835 sf footprint (see attached site plan). BHD would allow this private building on any 5000 sf RM1 or RM2 lot with only 50% affordable housing. Thus, based on ongoing development in our neighborhood, 1) the assumption that the deep affordable housing bonuses (double FAR, increased coverage, and increased height for only 50% affordable units) would only be used by nonprofits is incorrect and should be deleted, 2) BHD should reconsider the seemingly overly-generous affordable housing bonuses, and 3) BHD should consider that profitability and development capacity vary by neighborhood and that different incentives for different

neighborhoods would optimize affordability and livability (as defined in City planning documents) citywide.

- By implementing the draft's incentives, which offer additional Floor-Area Ratio (FAR) in exchange for guarantees of affordability, we can create economically integrated apartment buildings throughout the City at minimal public cost. As a result, low- and moderate-income families will be able to live in all areas of town at a price that they can afford (EPAP support)
- While the RNA supports affordable housing for a more economically diverse neighborhood; opinions differ greatly on how to get or enforce affordable housing. (Richmond)
- Consult affordable housing development experts, including public funders such as PHB and OHCS, on how fully realizing the deep affordability bonuses may be limited by funding sources. Although LIHTC funding does roughly scale with total development cost, local gap funding sources are often limited to fixed amounts - thereby making additional development in LIHTC funded projects unlikely even with increased density allowances. That said, so long as this proposal isn't coming at the cost of something else, we support the inclusion of more flexibility in how affordable housing projects can be designed including increased FAR, height, and lot coverage. We would also push for a reduction in setbacks for these same guidelines as well (both in the basic bonus as well as the "special" bonus for affordability). We strongly support the inclusion of a bonus for family-sized units and one that is at a higher MFI and not tied to permanent affordability. We would suggest staff look at the possibility of tying this (and other affordability bonuses) to SDC waivers, as is already done in the tree code (11.50.040.C.1.b.(4)). We would be interested in being a part of the conversation around program design and length of time required for affordability (PCRI).
- I also support added incentives for affordable housing, reduced parking requirements, and landscaping flexibility (counting eco-roofs and raised courtyards).
- More affordable housing....more open spaces
- See my proposed increases in FAR, lot coverage and reductions in setbacks in High Opportunity Areas as well as outside of them. While increasing uptake of IZ requirements (and the Deep Affordability option) is a laudable goal, experience with IZ in Portland so far is mixed. And, though the goal is to increase bonuses for IZ, the lack of a high top-end FAR in RM2, that would match the 4:1 of the often-adjacent CM-2 zones is puzzling. Is there some reason that RM2 on corridors is supposed to be "smaller" than CM-2, which is often also a housing-only construction? With the housing affordability crisis we are in, it is unacceptable to limit housing units purely to satisfy the need for a "hierarchy" of zones, especially when they are essentially "spot-zoned" along our major corridors, for seemingly political reasons ("we're not changing any residential to commercial" or vice versa). I support the inclusion of the three-bedroom unit bonus, although it should not be reduced to fit within the bonus "cap" in RM-1. The RM-1 cap should be raised. (Klotz)
- Bonuses: First, please strip the provisions lowering maximum RM4 building height in historic districts near transit stations. The last thing the city needs is to further reinforce the notion that forming a historic district is an effective strategy for making all new buildings in these neighborhoods shorter. If Council applies RM4 to a site, they are well aware of the context in which they do so. Our transit investments are expensive. The zoning code shouldn't knee-cap them. Second, this proposal goes too far in eliminating amenity bonuses. Some amenities, in particular those that improve the building envelope, actually support the city's

affordable housing goals. Housing costs aren't just about rent. They also include heating and cooling costs. Above-code building envelopes can help mitigate these, in addition to increasing the expected lifetime of the building and helping the city achieve its climate goals. Incentives for improved building envelopes and formal energy modeling needn't be large, but at a minimum they ought to offset the lost building area and height that comes from having extra insulation on every exterior surface of the building.

- Energy efficiency is an important factor for both long-term affordability and climate mitigation. Staff should explore ways to promote increased energy-efficiency in the multi-dwelling zones. To ensure that regulations do not accidentally penalize high performance projects with thick, energy-efficient walls, Portland could consider a model such as the “Floor Space Exclusion to Accommodate Improved Building Performance” employed by Vancouver BC. To actively promote energy-efficiency, consider adding a bonus or exemption for projects meeting specific efficiency criteria. For example, for Earth Advantage Multifamily Gold and Platinum certified buildings exclude the full thickness of exterior walls from FAR calculations. (Portland for Everyone).
- Sound Insulation and Solar Water Heating Bonuses -- UPNA LUTC opposes dropping the current bonuses for solar water heating and sound insulation. Improved sound insulation will improve the livability of the residents, and solar water heating or PV should be encouraged. Staff has not provided sufficient evidence or data that these bonuses should be dropped.
- Deep affordability bonuses are great!
- Bonuses for height and building coverage should be provided for the baseline affordability bonus in addition to the deep affordability bonus to avoid over constraining projects. For example, under the proposed language, an affordable project in an RM1 zone would be allowed FAR of 1.5:1. With the height limit of 35' and maximum building coverage of 50%, to use the maximum FAR these projects would be constrained to 3 stories each filling the full 50% allowed coverage. This results in boxy forms, and would not allow for any step down in response to neighboring development. Consider revising the maximum bonus levels to allow a combination of the three-bedroom bonus and affordability bonus in all zones (currently in RM1, there would be no incentive to do both three-bedroom and affordable). I also encourage staff to look for way to provide incentives beyond FAR bonuses. SDC waivers and Expedited Permitting are two examples of strong incentives that can change the bottom line of a project in a significant way. I support this proposal overall.
- NO BONUS for 80% of median, only for 60% of median or greater. The amount of low-income housing built in recent decades & the amount anticipated in the next decade is pitiful. Developers will be happy to take a density bonus for 80% of median - do not give them this option. We need a lot of low-income housing to try to restore the income diversity Portland has had in the past and bring back some of the folks who have had to move to neighboring jurisdictions. The 80% of median bonus is a real cop-out - probably to meet regional housing goals instead of trying for any meaningful income diversity. I am ashamed to live in a city which has focused on building a Pearl District and South Waterfront instead of building a decent amount of low-income housing. Portland will never make up for all those lost years, and these proposals will just continue & probably accelerate a heartless trend.

- Would have to see how this plays out. As long as high density is placed in the right area and linked to parking
- SGNA supports this proposal provided there is no alteration in the height limit or coverage ratio without going through an open adjustment process.
- Good goal, but the problem is it has shut down new projects. We need bigger bonuses, and/or less stringent requirements for affordable units. Even if we get more non-affordable units, we need those and eventually they will be affordable.
- Provide enforcement for this.. I think that this will be abused and misused, without strong and permanent protections for affordable housing
- I suggest eliminating FAR entirely and allowing the market to build the housing we need instead of artificially restricting it for some notion of "attractiveness". People deserve a place to live affordably.
- I like this, but I believe we should include an even larger FAR bonus for affordable housing. We really ought to sweeten the deal to the best of our abilities.
- Again, I'm concerned that this will just result in inappropriate density in locations that are not well-served by transit, goods and services.
- Fine. I would prefer that FAR be loosened for all projects given that FAR restricts housing supply. More housing will accelerate filtering.
- Providing a higher-level of development bonus (100 percent additional FAR) for projects with deeper housing affordability.
- Not sure which, or any, of these options is best.
- Emphasize Cottage Clusters! Building social capital and opportunity while providing affordable housing!
- This is great! Give bigger bonuses if possible. We need to have housing that people can afford.
- Good

4. **Provide incentives for preserving existing affordable housing and trees through transfers of development rights.** This will allow unused development potential to be transferred to other sites in exchange for preservation of these features or historic buildings.

- SGNA supports the concept of development rights transfer. We think that the tree and historic structure preservation TDR should be limited in distance so that the housing inventory benefit accrues to the neighborhood. We also recommend that the City administer a TDR bank for all eligible TDR transfers to facilitate these exchanges and, in limited circumstances, purchase the TDR to provide liquidity and certainty on the 'sending' side of the exchange. There likely will be many more 'sending' offers than 'purchasing' offers.
- We also support significant development bonuses for affordable housing, and transfers of development rights for tree preservation, historic preservation and preservation of existing affordable housing. (Portland for Everyone)
- Transferring development rights should also have a positive impact (UDP).
- The UPNA LUTC requests that developers be granted the option for Transferable Development Rights OR bonus height/FAR/Coverage. This will increase the flexibility for localized and innovative designs while promoting financial/economic viability for

developers. UPNA is particularly concerned about maintaining the tree canopy, particularly for large trees and TDRs might not be a sufficient incentive in some cases. Staff has not provided evidence that the TDR proposal will be a greater incentive than the current bonus.

- RNA supports as-written.
- Transfers of development rights may be troublesome and create massive monolith buildings that do not fit in context with their surroundings. The transfer of development rights that can create larger scale buildings needs to be reconsidered, tightly regulated and/or extremely limited. The FAR bonuses also need to be significantly reduced. One size does not fit all neighborhoods. The FAR bonuses for affordable housing are too large and will create oversized buildings that tower over existing homes and other neighborhood structures. The length of time units must remain affordable is multi-generational, far and way too long, and in reality, may outlive the useful life the buildings themselves. The larger overall scale of structures may be acceptable in downtown Portland, but even with step down architecture, the large scale buildings will create negative quality of life impacts for residents nearby in adjacent lower density zoned and single family home areas.
- Please strip the provisions that forbid FAR transfer into historic districts. While certain kinds of preservation can be a laudable goal, the last two years have made it crystal clear that the rules for forming historic districts aren't well aligned with the kinds of places which provide civic value to any reasonable portion of the population. Similarly, please strip the provisions that prohibit FAR bonuses for subsidized housing in historic districts. If there's BPS concern that a larger building might be hard to get through design review in this situation, let the applicant work that out for himself. The last thing the city needs is to further reinforce the notion that historic district formation (over which the city has no say) is an effective strategy for pushing higher intensity development and lower income residents elsewhere. Let the Council make development intensity decisions as part of legislative zoning map amendments. Zoning decisions are city policy and shouldn't be decided by either a tiny subgroup of residents or a state/federal administrative bureaucracy in the absence of explicit law.
- Please do not consider Historic District status when determining the availability of FAR transfers. If we are going to have a system of transfers (rather than just eliminating FAR restrictions as we should do) then the transfers should have the greatest chance of being used to add housing. This means allowing them anywhere in the city.
- FAR transfer rules are extremely complicated. According to a (large central-city) developer I've spoken with, FAR is extremely tricky to appraise partly due to a lack of liquidity in the market. Make it easier to buy/sell and you'll get these transfers (for good desirable reasons and sometimes questionable ones) far more often. Please just allow this kind of transfer outright within 2 miles.
- The good news here is that BHD now proposes to allow contributing resources to transfer extra FAR out of historic districts and get paid for it if there is a viable market for FAR transfers, and I believe there currently is. This is a new proposal added after the last discussion draft. This should help with upkeep and maintenance of contributing resources. For historic districts, we support the following: the use of FAR bonus for inclusionary zoning and 3 bedroom developments, but the use of bonus FAR for the RM1 zone should be capped at 1.5 to 1, and for the RM2 the cap should be 2 to 1. No bonus FAR should be allowed in

the RM3 and RM 4 zones, which are already 2 to 1 and 4 to 1, respectively. We support the restrictions on FAR transfers relative to historic districts. While we are talking about bonuses, I propose for discussion that any incentive or subsidy or bonus, such as additional bonus FAR, additional units, waiver of parking requirements, or waiver of system development charges should require the property owner to agree, among other things, that the property will not be used for short term rentals, and that the property will participate in a city approved parking management plan that covers the property area. (Irvington)

- I support this.
- How will this interplay with URM seismic retrofit needs?
- NO - our streets have already become canyons of 4-, 5-, 6-story buildings & greater. NO ALLOWANCE TO GO EVEN HIGHER THAN THE ZONE ALLOWS.
- SGNA supports this concept provided the transfer for tree and historic structure preservation is limited in distance so that the housing benefit accrues to the neighborhood area. Given the variations in neighborhood sizes and shapes we would like to see a distance criteria used to limit TDR for non-affordable housing preservation bonuses. We also recommend that the City administer a TDR bank to facilitate these exchanges and, in limited circumstances, purchase the TDR to provide liquidity and certainty on the 'sending' side of the exchange. There likely will be many more 'sending' offers than 'purchasing' offers.
- This is good not only for preserving existing housing and trees, but also because we'll get higher FAR elsewhere due to the transfer.
- OK in concept, if it works
- This is a good idea. Mature trees are getting slaughtered left and right, even after our allegedly strong Title 11 was adopted.
- Fine, as long as there are plenty of sites available that can actually make use of the development rights. Otherwise this would accomplish nothing.
- I agree
- It depends on the "existing" affordable housing we're talking about. Some housing may be affordable because it's a really a terrible place to live.
- Not sure .
- That's clever. Sounds good.
- Good

5. **Allow small-scale commercial uses on major corridors and near transit stations.**

- RNA supports as-written.
- Allowing small scale commercial uses on corridors and near transit stations can help property owners and entrepreneurs increase their income, expand the availability of services, and create a richer neighborhood environment. (Nick Sauvie)
- We support the proposal to allow commercial uses in the RM zones within corridors with the caveat that the scale of commercial spaces is limited, for example live/work units, or small leasable ground floor/mezzanine and maker spaces that do not exceed the foot-print of a typical small retail shop. That limit could be 1000 sq. ft. for example. (SGNA)
- Allowing small scale commercial uses along corridors in residentially zoned areas should have a positive impact in creating more opportunities for local services and increasing the walkability and social interaction that make neighborhoods vibrant places (UDP).

- We endorse proposals allowing limited commercial uses along corridors. North Westmoreland lacks retail and is not a walkable neighborhood despite the presence of frequent transit; this proposal would help correct this problem (SMILE).
- UPNA LUTC requests that the commercial limit (p 27) should be increased from 1,000 sf to 1,250 sf or waived entirely. Limiting to 1,000 sf is a good incentive for small shops, but it might be too small for day cares, sandwich shops, since it limits the street face to @ 20 feet. The Staff and Discussion Draft do not provide a rationale for why 1,000 sf maximum was instituted.
- Daycare, in particular, is an extremely low-impact, high-value service no less compatible with residential zones than houses of worship. Requiring this use within 100 feet of a civic corridor is unnecessarily strict. Further, I would feel significantly better about putting a child in daycare if I knew that the facility was 200 -- 300 feet away from a busy street. In typical inner neighborhoods, this would allow a daycare an entire block away from a corridor. This is a safety advantage *and* it allows daycare uses to avoid competition with other commercial uses in some circumstances. Accessory commercial use: It may be that I don't understand this language, but a leasing office or building mail room (that may provide shipping services like an Amazon locker, which could be considered a commercial use) ought to be allowed external signage and possibly external entry in a sufficiently large building.
- I support this, and would eliminate front setback requirements for any building that includes at least 25% of the frontage in retail.
- We support this proposal. However, we would suggest that an additional FAR allowance be associated with commercial uses in order to support the commercial uses without taking away potential residential units (PCRI).
- Where small-scale commercial uses are allowed, grant FAR to offset housing losses/ enact a no net housing capacity loss policy on these sites (Portland for Everyone).
- The only relevant corridor in the IHD is Broadway which already has commercial uses. The use could be on Broadway and one-half block into the neighborhood, which also seems reasonable, given the current commercial uses in the neighborhood.
- Count the commercial FAR separately from the residential FAR to avoid displacing housing units. Consider also allowing small commercial spaces as a part of projects over a certain unit count, perhaps 40? A development with enough units can support a small café, market, or etc. Allowing this would bring an amenity to an area that is not already well served by transit and commerce.
- Of course.
- SGNA supports this proposal with the caveat that the scale of commercial use is limited. Live/work units, or small leasable ground floor/mezzanine spaces that do not exceed the foot-print for a typical small retail shop (1000 sq ft).
- Yes, we need commerce and amenities near housing.
- agreed- increases neighborhood livability
- Of course this should be allowed
- I love this, small businesses really liven up a neighborhood.
- Yes, please. For example, the RH zone at the north end of Westmoreland desperately needs small-scale commercial, such as convenience stores and coffee shops. Hundreds of no-parking apartments have been built in the past 5 years with no new services.

- Please allow commercial uses of all sizes, not simply small-scale, on major corridors and near transit stations.
- Yes
- Yes.
- Only as needed by local, walkable residents.
- Seems reasonable.
- Good

Outdoor Spaces and Green Elements

- Consider changing the term “Green Elements” to “Landscape Elements” for clarity (UDP).
 - We appreciate the differing requirements for sites above/below 20,000 SF. We would also suggest that staff explore an option for incentivizing shared common space versus requiring it. i.e. – a lower SF per unit for shared common areas versus individual common areas. And/or consider exemptions for sites that are within walking distance of a park. We also support the option to count indoor community spaces toward the common area requirement. While we value the need and intention of required outdoor space, we do encourage staff to again evaluate the layers of requirements that come with outdoor space, setbacks, lot coverage limits, accessible entries, and where/how these various items can or cannot intersect and how this impacts our ability to provide affordable housing. The more requirements and restrictions that are put on a project, the less creative and flexible we can be with our design in order to meet program goals and requirements for the project. This also increases design time and costs. We would prefer an incentive model on items such as outdoor space rather than a mandate. (PCRI)
 - I urge staff to simply set minimum open space standards and maximum impervious surface (paved) standards and to eliminate all minimum parking requirements.
 - Maximum lot coverage should be increased to match CM zones, especially if balconies, porches, decks and/or rooftop decks are provided.
6. **Require residential outdoor areas in high density zones** – 36 square feet per unit on sites up to 20,000 square feet, and 48 square feet per unit on larger sites.
- I support increasing Portland's density to combat our growing population and housing shortage, and applaud the open space initiatives in Better Housing By Design.
 - I support this, except I would eliminate the requirement for sites of 7500 Sq.Ft. or smaller, where this is more difficult to provide.
 - We request that outdoor or green space requirements be the larger 48 sqft for all sizes of properties (RNA).
 - This is a worthy goal, but it will limit the number of units produced, increase the cost of construction, and prevent some projects from being built. Open space should not be the priority, given the affordable housing crisis, the urbanization of the city, and the prevalence of parks and green space in most parts of the city. (Nick Sauvie)
 - The illustrations depicting the “requirements for residential outdoor space in higher density zones” represent a potentially deadly risk for persons occupying these balconies in locations which are near utility power lines greater than 600 volts. I strongly recommend that there

be discussions with the power utilities, PGE and PP&L, design and safety departments to discover, develop, and implement safe design for the sides of buildings adjacent to power lines greater than 600 volts. Consider the process another facet of “Vision Zero”. You really have an obligation to address a serious public safety risk. If not addressed on the front end the result will be BDS, which currently does not consider elements outside of the envelope of the building, approving and permitting designs that will be unnecessarily complicated by conflicts with power lines. These conflicts can be mitigated with smart design. The beneficiaries will be developers, architects, contractors, and ultimately the residents of the buildings.

- Required Outdoor space should be eliminated. It drives up the cost of housing while also being an inefficient use of small spaces. Instead, we should encourage people to use our great park system. Besides, lot coverage limitations, FAR limits, etc. will basically ensure there is open area anyway. Mandating open space on individual lots makes no sense and is not an efficient use of the scarce land we have dedicated to housing. The whole point of a park system is to give public space for trees, recreation, outdoor play, etc. The proposal seems to be redundant with our city asking for both high SDC fees to fund parks, and then requiring each development to basically include a park. I would urge you to rethink this, increase lot coverage for buildings, decrease or eliminate property setbacks and allow more dense housing on all multi-family zoned property.
- Often such spaces are not particularly useable or practical. I’m somewhat skeptical of requiring BBQ pads at the cost of more homes.
- Allow shared common areas of a minimum size to be worth 2x their area, and count toward this requirement. This would encourage community spaces on sites while also acknowledging that shared spaces are more space efficient than private spaces.
- Good design feature but it has to be imposed with parking
- SGNA supports this proposal.
- This may be too inflexible. Yes we need the green space, but maybe not necessarily in every residential site. Maybe larger collective green spaces.
- The illustrations depicting the “requirements for residential outdoor space in higher density zones” represent a potentially deadly risk for persons occupying these balconies in locations which have utility power lines greater than 600 volts nearby. I strongly recommend that there be discussions with the power utilities, PGE and PP&L, design and safety departments to discover, develop, and implement safe construction design for the sides of buildings adjacent to power lines greater than 600 volts. Consider the process another facet of “Vision Zero”
- Good idea
- This requirement, while well intentioned, would limit housing unit construction and raise rents. It's not a good idea.
- Agreed.
- No, I disagree strongly with this idea. Please maintain flexibility in housing design. This requirement runs counter to our affordability goals. We have a wonderful parks system in Portland that can meet this need. Assuming that people need residential outdoor areas is misguided in the same way that assuming people need off-street parking is misguided.
- Agree

- Where possible yes, and also, support for close by community garden spaces.
- Sounds about right, but not sure. Depends on how common spaces are counted, etc.
- Nope. We have public parks. Every apartment building doesn't need their own park. The city and parks are their public spaces. This is going to limit development and drive up the cost of housing.
- Good

7. Require shared common areas, such as courtyards, for large sites more than 20,000 square feet – common areas must be at least 10 percent of site area.

- We endorse proposal 7 (shared outdoor space) (SMILE).
- We request that common areas be an element be for all sizes of properties (RNA).
- When shared common areas are provided, such as a central courtyard, allow for 0' side setbacks, and allow them to count double that of individual areas toward meeting the per-unit common area requirement. This would greatly incent combined outdoor spaces. (Portland for Everyone).
- Common areas should strive to be contiguous, or somehow functional (UDP).
- I support this, but only for larger sites.
- Provide alternate option for townhome style developments, with an increased minimum yard area per unit.
- Again, good idea but parking must be a requirement
- SGNA supports this proposal.
- This requirement, while well intentioned, would limit housing unit construction and raise rents. It's not a good idea.
- I believe that if a building is within about a 5 minute walk of a decent sized park this requirement should be relaxed. Otherwise this is a great requirement.
- Sounds good.
- No, I disagree strongly with this idea. Please maintain flexibility in housing design. This requirement runs counter to our affordability goals. Please stick to making sure housing is safe and supports walking, biking, and transit.
- Agree
- Yes.
- Yes, depends on the size of the units. Smaller units need more outdoor space.
- Nope. Again, this doesn't really work with tall buildings. The city streets are the shared spaces. They don't need a courtyard which ends up usually being wasted space.
- Good

8. Allow alternatives to conventional landscaping, such as eco roofs, raised courtyards and stormwater planters, to meet landscaping requirements.

- RNA supports as-written.
- Support.
- We also like the approach of allowing stormwater planters/ecorooftops to contribute to the landscaping requirements. This will greatly improve smaller project cost efficiencies and

improve many site layouts. In addition, we ask staff to develop less stringent landscaping requirements for sites less than 7,500 sf (Portland for Everyone).

- We endorse the overall concept, but recommend that an eco-roof not be given equal weight as landscaping. An eco-roof should not replace ground-level landscaping which enhances the pedestrian space near the building (SMILE).
- Any landscaping requirements should encourage TREES as well as sustainable stormwater facilities using NATIVE PLANTS.
- Alternatives to conventional landscaping could include functional landscapes such as living machines or food uses (UDP).
- We do have a concern in the greenspace implementation as it relates to trees, especially large-form trees. The health and stormwater benefits of large form trees vastly outweigh similar benefits of other greenspace BMPs, such as green roofs and shrubs/herb gardens. The heat island benefits of a large form tree are likewise superior to smaller trees and shrubs. We want to ensure that the BHBD plan does not allow these other forms of landscaping to substitute for large form trees, where such trees may fit available space. On a related subject, please ensure that pervious buffer strips and the like have a required geometry capable of supporting large form trees. (Urban Forestry Commission).
- There should be minimal landscaped area requirements - we have parks, street trees, and an urban growth boundary for this. Let's focus our residential zones to allow for the most housing we possibly can. Landscaped area requirements should not be mandated to be on ground level - green roofs, raised courtyards etc. should count towards 100% of the landscape area requirements.
- Yes.
- I see no reason to allow an eco roof to count toward landscaping requirements. They're nice but in no way equivalent to landscaping in people spaces.
- SGNA supports this proposal.
- Yes, we need to be creative to get the most units at a cost that developers can bear.
- I disagree on the ecoroof. Ecoroofs have virtually no discernable mitigating benefit to the urban environment as viewed from most of the surrounding public or private realm, unless you live in a taller building next to one. Ecoroofs are nice, but they shouldn't count toward landscaping.
- Great!
- Strongly support
- Yes.
- Yes, and vertical gardens too. I'm a landscape Architect, so would have more to say on this.
- That sounds good.
- Good

9. Limit large surface parking lots and asphalt paving

- Limit surface parking to 30 percent of site area
- Limit asphalt paving to 15 percent of site area (because of the greater urban heat impacts of asphalt).
 - We endorse proposal 9 (limit impervious areas)- SMILE
 - RNA supports as-written.

- Agree.
- Heat island reduction. This one is easy. Paved surfaces absorb and hold heat from the sun and add to the heat island effect. We want less heat island, we want less surface parking.
- I support this as a way to meet the city's sustainability goals, but I hope BPS looks closely at whether these percentages will work for prototypical developments. (Nick Sauvie)
- Allow a portion of the on-site surface parking (parking space only) to be applied to the open space requirement.
- The size of surface parking lots need not be limited if "green construction" is utilized.
- Further study is needed regarding the cost-impact of the proposal to limit the amount of asphalt paving (especially cost impacts on affordable housing projects). Consider excluding covered parking, such as carport structures, from surface parking limits (Portland for Everyone).
- While we support the need and purpose of this element, we would encourage staff to explore exemptions/alternatives for affordable housing developments as the cost difference between asphalt and the alternative materials proposed is substantial (PCRI).
- Things urban housing is more important than: the permeability of urban land (because every home not built in Portland creates much more pavement per capita in the suburbs, doing even more damage to the environment). Therefore, please: do not require parking areas to be permeable or small in any zones where parking remains mandatory (but feel free to add these requirements if parking is optional)
- Remaining minimum parking requirements are problematic if mandated parking will be required to be more expensive. Structured or permeable parking is fine if it is not required. If we still have minimums then this is green-washing.
- Consider allowing paved parking areas covered with a carport to be subtracted from the total paved area. This provides an amenity to the residents and would help reduce urban heat island. Perhaps consider additional options to offset paved area over the max. For example, a carport with a green roof or solar panels could allow an offset of additional paved area – perhaps 1.5SF of additional paved area for every 1 SF of green roof.
- Parking should continue to be required, and since parking structures or underground parking are supposed to be very expensive, the trade-off to get needed parking is probably more surface parking than 30 percent of site area.
- Like the limitation on surface parking but parking can be placed under a building. Developers don't like this but we are not in the business of attending to their needs alone. Parking on neighborhood streets is a major problem in SW Portland as we have no sidewalks. Further, forcing parking on neighborhood streets is in direct conflict with other goals of the City such as Vision 0 and Safe Routes to Schools. In the past, City staff have rejected these policies and "not code" but why would the City engage in these projects if it is going to reject their effect by jamming streets with parking. We all need to acknowledge that real life for most residents involves car transportation. The idea that mass transit and bikes will provide sufficient mobility is fantasy.
- SGNA supports this proposal.
- Yes! Parking is not a priority.
- OK idea, but some neighborhoods need parking in the building due to neighborhood topography; see below

- How about banning it?
- This seems reasonable, but may need to be tweaked based on the total size of properties.
- Can you keep the option for surface parking with alternate surfaces (pea gravel, etc.) and added landscaping?
- Great!
- No! all you do is make street parking harder.
- Well, I'd like to see the limit be 15%, but, I'm mindful of the fact that public transit in this town is just so-so at best. Restricting parking absolutely requires that Tri-Met improve service.
- Depends on site.
- This is a good start, but maybe go farther. Parking drives up the cost of housing, goes against our transportation goals, leads to more driving and climate change. Cut those numbers down if possible.
- Good

10. Reduce parking requirements

- No parking required for most development on small sites (up to 7,500 square feet in size).
- On larger sites, reduce the minimum required parking ratio to 1 space for every 2 units (instead of 1 space for each unit).
 - This will allow more housing to be built, and create more flexibility and choice in site design. **(Nick Sauvie)**
 - Please reduce the number of available parking spaces required in the City of Portland. Free street parking and car storage is not something we can indulge in at the expense of preserving green space and increasing available housing. People (seniors, families, commuters, youth) acquiesce to the cheapest and easiest option. Don't make easy driving one of them when we have excellent transit and such a walkable, bikeable city.
 - We support staff's proposal to limit impacts and cost-drivers such as parking minimums. In addition, we ask staff to expand the parking minimum exemption throughout all multi-dwelling zones. Portland should be moving toward a parking allowance system, rather than minimum requirements. We should allow for parking when it makes sense, but also allow for maximum cost-effectiveness and flexibility in all cases **(Portland for Everyone)**.
 - Reducing the required parking enables more units to be built on a site, and with less cost. Ideally this will mean less costly, more affordable units **(UDP)**.
 - Please remove ALL parking requirements on new developments. The space occupied by storing vehicles within the city limit would be much better utilized by housing and green spaces. Parking lots of any size contribute to heat islands, do not generate the same property tax as residential units, and do not contribute to 20-minute walkable neighborhoods which the City of Portland claims to encourage. If there truly is a need for on site parking, the private development will develop it and determine how much to add onto the cost of each unit on a housing site. If people chose to rely on public or active transit, they will be more likely to select a housing site without parking. Let them have that choice to support vibrant neighborhoods with more green spaces. Set a maximum amount of space that may be set aside for parking AND eliminate minimum requirements for parking. What

we do today will have impacts on future generations. Let's give them the best city that we can today. **(MSANA board member)**

- My primary concern/comment is on the issue of parking. I ask in particular that there be no required parking for these multifamily zones. Reasons: #1 Climate change. #2 Safety. #3 Equity. #4 Heat island reduction.
- Let's do away with mandatory parking requirements and take Minneapolis's lead on doing away with single-family zoning requirements so we can live in a place people can afford to live.
- As a lifelong Portland resident, homeowner and parent, I choose affordable housing and open space over parking requirements. Already infill without green space is destroying our urban canopy - which saves lives, especially in air-quality challenged city like ours. We need more alternative transportation, bike and pedestrian friendly neighborhoods, and much more green space. Our children are living and breathing here.
- I live in North Portland. We need more housing and no more parking. No more parking minimums. We need more parks and wider sidewalks. We need fewer parked cars near crosswalks because parked cars are a danger and block line of sight.
- I choose affordable housing and open space over parking requirements. Please completely eliminate minimum motor vehicle parking requirements.
- If we do not get rid of minimum parking requirements they will be directly in conflict with open space, and make building housing more complicated. Portland needs to discourage unnecessary car user and parking, not subsidize it. Please consider eliminating parking requirements for all multi-family housing in the plan, so that developing housing and open spaces is simple for developers and we aren't subsidizing cars we don't need.
- I choose affordable housing and open space over parking requirements!
- I'm writing to ask that if you are going to add new green space requirements to apartment buildings, that you eliminate parking requirements. Otherwise, the concatenation of many requirements will increase the cost of building apartments, leading to higher costs throughout the city and adding to our problems with housing affordability. They will also mean that borderline sites--sites with an environmental overlay, or with a steep hill, or awkward access, or something else that makes them expensive or challenging to deal with--likely won't get built at all. That's in direct opposition to the city's stated goals of increasing housing supply. We have a long way to go to make up for the housing that wasn't built during the great recession. Don't let these new greenspace requirements simply be a form of greenwashing. Besides, lack of parking is one of the few things shown to actually incentivize middle class people to take more transit or bike more. Which, again, is going to be key to Portland being a sustainable city. We already have terrible air quality. What's the point of greenery if it's offset by polluting cars?
- Hello, I'm a Portland resident writing to support prioritizing affordable housing availability and open space over parking as part of Better Housing By Design. Specifically, I ask that staff recommend eliminating minimum parking requirements for all multi-family housing zones.
- It's time to remove required car subsidies in Portland's design code. That is, it's time to remove the requirement that housing includes car storage (parking). Plans should be about the future, and about the future we want. And the future I want is one where housing is more affordable, and people (like me) who drive pay for parking their cars. It's time to

unbundle! We've realized that the people who don't own cars are the poor, the less educated -- and yet we're still requiring everyone to buy car storage with housing. That's an expensive, regressive tax on the less fortunate. The future is likely to include a massive rethink of vehicles, as fleet-owned automated vehicles take the place of personal cars. To require on-site parking for cars that won't exist in a few years (or perhaps 20 years) seems to be baking in a future that won't happen. Leave it up to the developer to decide whether they want car storage. Don't require it in City code. Let's deal with parking through parking management and the market, not through required parking.

- Using the previously described template, a 5000 to 7500 sf multifamily lot could have over 30 units and would not be required to have parking. (Note that page 31 of the staff report only mentions triplexes and fourplexes). If it were far from frequent transit, as some of our corridors are, an abutting 30+ unit development zoned commercial would be required to have parking. This would make construction of large apartments far from transit more economical in multifamily zones than mixed use zones. To eliminate this inequity, waive the parking requirement for small lots only where there is frequent transit (SMILE).
- Things urban housing is more important than: cheap and easy auto parking. Therefore, please remove mandatory on-site parking from higher-density residential zones.
- We would like to see more parking permit programs or zones to better prevent the current tragedy of the commons occurring near dense residential and commercial areas with street parking (**RNA**)
- We highly support removing parking requirements for sites up to 7500 SF and believe this aligns well with the RIP parking proposal as well. In addition, we also would recommend increasing the lot size threshold to 10,000 SF (**PCRI**).
- REMOVE PARKING REQUIREMENTS in Multifamily Zones. The structured parking that developers will be forced into w/ current proposed requirements will add ~\$400/mo. to rent.
- I choose affordable housing and open space over parking requirements. Portland's desire for more affordable housing and open space are at direct odds with our minimum parking requirements. Better Housing By Design allows more density in multi-family zones and adds new landscaping and outdoor space requirements to larger lots (20,000 sq/ft+). In addition, the proposal limits surface parking to 30% of the site area and limits impermeable paved surfaces to 15% of the site area. These restrictions are meant to reduce "heat islands" and excess runoff, and those are important goals, but this is greenwashing unless minimum parking requirements are completely eliminated first.
- All parking minimums should be replaced with parking maximums for all multi-dwelling zones, anywhere in the city. This will improve affordability, reduce impervious surface and create more room for trees and habitat for humans and other ecosystem members.
- The Better Housing By Design proposal includes some interesting requirements regarding impermeable surfaces and reduced site area for parking. But, when combined with required minimum parking requirements, this means that we'll continue to require new buildings to include on-site parking, and we'll additionally require that parking to be built in a more expensive way. These costs will inevitably be paid by tenants or buyers, perhaps even if they don't use the parking. This leads to more expensive housing, exactly the opposite of what this city needs! Furthermore, doubling down on parking minimums at a time when future

parking demand is very difficult to forecast is short-sighted. Let builders decide how much parking their tenants or buyers require; don't make that decision now for someone building in 10 years. Please drop all minimum parking requirements from the BHD plan. We have a shortage of open space & housing in this city. We don't have a city-wide shortage of parking.

- I choose affordable housing and open space over parking requirements.
- First of all, there should be NO minimum parking requirements. That is an incredibly antiquated requirement that all *truly progressive & smart* cities are phasing out or have entirely eliminated. Plus, Better Housing by Design might force developers to build structured parking, which is incredibly expensive; it adds an average of \$400/month in rent. Also, we won't meet any environmental goals as long as parking minimums are required. And we won't be an actual *people*-friendly city as long as we continue to encourage people to *drive* unnecessarily here in the CITY of Portland. I'm glad to see that parking requirements may be eliminated for lots that are up to 7500 square feet, but let's go the distance. Please, for the sake of both the environment and *efficient land use*! :)
- For a host of reasons, the desirable goals of increasing open green space, and providing much needed affordable housing, are in direct conflict with requiring parking for automobiles. Many policies already in place within the City of Portland support the idea of moving away from cars - SOV's - and toward healthier and more efficient means of transport. Providing parking just makes it easier for a given individual to choose to drive over other alternatives that are inarguably better for society.
- I propose eliminating all parking requirements in the Multi-dwelling zones. Much of the multi-dwelling zoning is already exempt, and the rest should also be.
- The on-site parking requirement for small lots should be waived only where there is frequent transit to prevent inequities between adjacent multifamily and commercial zones that would make building dense apartments more economical in multifamily zones than mixed use zones.
- The thoughtful proposals to restrict frontage garages and limit surface parking, when combined with parking requirements, will make housing more expensive and make site planning more complicated. Eliminating the requirements will allow developers to make the best choices and tradeoffs for their projects. Many may choose to build structured parking, but it will be voluntary and the additional costs of preserving open space and/or permeable surfaces will be avoidable. We don't know what the future has in store, disruptive changes in transportation may happen much faster than we expect and the city will not be nimble enough to adjust parking requirements to match up with potential rapid declines in parking demand.
- Require one parking space per a, including on-site and the property facing street, per apartment in RM1 and RM2 zones. Require a portion of the FAR be devoted to parking. Have slightly lower parking requirements immediately adjacent to frequent service transit lines. All of the above parking proposals are designed to protect neighborhood context and livability. It is unreasonable to anticipate that apartment residents will not have private cars and use transit and Uber exclusively. I own two affordable 4-plexes. At one building, there are six vehicles and at the other there are three.
- Parking should be provided on site for the number of vehicles expected to be owned by residents. It is poor policy to allow multi-family development to have its residents make

parking lots out of adjacent neighborhoods. (I will add that going forward in new residential construction generally, I believe that people who own cars in the City should provide off street places to park them.)

- One of those negative quality of life impacts is the absence of, or insufficient, off-street parking. This includes the non-requirement for off-street parking for smaller residential structures in areas where lower density zoning exists. Is this plan to not require adequate parking throughout the city also a plan to create the same type of on-street parking mayhem that already exists in Northwest Portland? Will households with electric cars have to run extension cords across the sidewalks or down the block for overnight charging? Is the absence of adequate on-site parking an attempt to "dictate" to renters they should not have a car? 59% of low income people drive to their place of employment. There has been a lot of conversation about housing type and neighborhood choice, but what about choice in transportation? Is the elimination of parking for affordable housing a form of discrimination? The city's own studies suggest that 72% of households in new large multi-unit without parking have one or more cars. Filling up the streets with parked and stored cars from the new residential developments without adequate off-street parking is already a hot button issue for the tax paying residents of adjacent neighborhoods. Yet, the city is turning a deaf ear, not listening or hearing them! Adequate off-street parking for car storage (with close by electric outlets) needs to be mandated for all new residential construction. With large apartment complexes such as in zones RM2, RM3 and RM4, this parking needs to have no less than three parking spaces for every four units. Smaller developments such as in zone RM1 need a have a one to one ratio. This mandate for off-street parking must also apply to new residential development on frequent transit corridors and within light rail station areas. People that use an alternative means of transport to commute also have cars. Continuing an expectation to utilize turnover on-street curbside parking for car storage from new developments is unacceptable.
- Good start! City is piloting residential permits and need for required parking should be lessened. Most of these developers are likely to build some parking. Trying to set arbitrary amount of "appropriate" parking is a fool's errand. I suggest:
 - Eliminate all parking requirements.
 - Pass permit parking program.
 - Use revenues on improving access for other modes.
- DO NOT REDUCE PARKING REQUIREMENTS - there is no reason to believe people's desire to have their own auto is going to change in the next 10 years. On the next go-round with the comprehensive plan, reducing parking requirements may well make sense - it is not the way people live now. PBOT has been offering programs to get people out of their cars for almost two decades, and the percentage of additional households who have eliminated cars is minimal.
- Absolutely not. This has been significant issue in all meetings on the RIP despite the City staff rejecting those views. Again, the impact on neighborhood streets argues against this.
- SGNA supports this proposal with the caveat that the City needs to do more to incentivize residents in MFR districts to abandon their cars. Design requirements for safe taxi/car share pick up/drop-off, short duration car share services, transit pass discount included in rent, etc.

- Yes! Parking is not a priority. That space can be devoted to more units at lower cost.
- This is a disaster for neighborhoods with hilly topography and poor road/transit access. Specifically, in Homestead, it is impossible to use the very limited public transit to go shopping for food and the immense misuse of the very limited existing parking by Marquam Hill commuters makes street parking impossible. So older people, disabled people, and families with young children would find it literally impossible to shop for groceries (I suggest a BPS staff member try this in real life... taking the bus to a grocery store during non-weekday hours.. and shopping for food). Although there technically is "frequent transit" here at certain times, it really is only for commuters and there are NO services that one can walk to, apart from a marijuana dispensary, a thai restaurant, and a Plaid Pantry with mostly alcohol, chips, and no fresh produce. This is dramatically different from East PDX with its very flat topography and easy walk/bike/bus to supermarkets. Thus, I strongly recommend that you mandate parking for developments in hilly topography areas or else exclude these regions from this plan.
- There should be no parking requirements, that will: 1) substantially raise housing costs 2) look ugly Why would we raise people's rents to make our city uglier?
- If a site is within a half mile of frequent transit we shouldn't be requiring any on site parking, regardless of the projects size.
- I disagree. Location relative to frequent transit should be the driving factor.
- Without amenities nearby such as midsize or small grocery stores, dependency automobiles will still exist in neighborhoods in Southeast Portland (such as Montavilla).
- Please eliminate all minimum parking requirements. Requiring parking runs counter every City of Portland goal--it is bad for the environment, climate change, transportation mode share, housing affordability...the list goes on. PLEASE eliminate parking requirements.
- Strongly disagree. We need more parking
- As long as the site in question is well served by mass transit.
- 1 space per unit, depends on location to mass transit.
- Go further. Just remove the parking minimums. This isn't the suburbs.
- Good

Building Design and Scale

11. Limit garages to no more than 50 percent of building street frontages.

- We support proposals to limit garages on street frontages, to simplify standards for side and rear setbacks, and to require building entrances to be oriented to streets or courtyard. **(Portland for Everyone).**
- Limiting the garage frontage to 50%, requiring building entrances to be oriented to the street or courtyards and the other provisions of this section should greatly improve the walkability of these areas, addressing a major drawback of many existing housing projects **(UDP).**
- We endorse the proposed limits on garages. Fewer curb cuts that serve multiple cars are better than more curb cuts that only serve one car. Excessive curb cuts convert the sidewalk

to a driveway, discouraging pedestrians. Where possible, limit curb cuts to every 50 feet and they should serve more than one vehicle (**SMILE**).

- **UPNA LUTC** supports.
- **RNA** supports as-written.
- We should not allow garages to face the street at all. I would recommend eliminating all parking minimums and forbid garage doors from street facing facades.
- Support.
- ½ way there! But if parking is required then there should be no new burdens on building it. With existing requirements, this will make it harder and more expensive to build housing.
- **SGNA** has no stance on this proposal.
- Yes
- Sure, but some buildings in hilly/challenging topograph areas should be required to have parking if there is no way to walk to a grocery store.
- Agreed.
- Great (no garages at all would be best!)
- Disagree
- I'd rather see garages be forced further back from the front of property lines, so I'm thinking more like limiting them to 30%
- Sure.
- Go further. Housing is for people. Not half for people, half for cars.
- Good

12. Require building entrances to be oriented to streets or to courtyards.

- We endorse proposal 12 (entrance orientation) – **SMILE**
- **RNA** supports as-written.
- Support.
- Good
- **SGNA** supports this proposal.
- I don't see this as a priority.
- Ye
- Yes, parking lot entrances are terrible
- Agreed, as long as there are exceptions for ADUs.
- Great!
- Don't care
- Yes, although, of course, multiple entrances are fine too.
- Yes, but flexibility is nice too.
- Seems good.
- Good

13. Require front setbacks that reflect neighborhood patterns and limit privacy impacts. 10-foot minimum front setbacks in the RM2 (R1) and RM3 (RH) zones, with smaller setbacks allowed for commercial uses, raised ground floors, or to match adjacent buildings.

- We endorse proposal 13 (front setback) – **SMILE**

- The proposed setbacks and maximum building coverage in the Better Housing by Design Discussion Draft are pleasing and welcomed as are outdoor green spaces.
- Increase setback adjacent to single dwelling zones.
- The new proposed front yard setbacks in the R3 and setbacks for taller buildings may not be appropriate in the older areas of the City.
- The proposed standard doesn't seem flexible enough. Perhaps have different standards for RM-zones that are interior to a neighborhood vs. those that are on transit corridors **(RNA)**.
- Designers should have options to maximize the potential of various sites. Setbacks may waste usable space in urban locations. They may create relatively useless open space in the front of buildings at the expense of other parts of the site that may offer more privacy or sunlight. It is a mistake to require new development to match setbacks of adjacent buildings. Zoning should shape the future of the built environment and not the past. **(Nick Sauvie)**
- Let the exclusionary "historic character" of the neighborhoods change. We need to house more human beings at different income levels in every neighborhood. Housing is a fundamental human need, and historic character is not.
- Reduce front setbacks to 5 ft everywhere, and to 0 ft everywhere if the ground floor is 2 ft or more above street level. Reduce the current minimum 10 ft side setback for RM3 and RM4 buildings over 55 ft tall. (Portland 4 Everyone).
- Things urban housing is more important than: strips of grass. Therefore, please: remove mandatory setbacks from higher-density residential zones.
- Further, I don't think minimum front setbacks should ever be more than 5', especially on streets with good transit connectivity. This kind of requirement might make sense in the Eastern neighborhoods specifically called out for other special treatment, but it doesn't make sense in the best-connected areas West of 82nd Ave where lots are often small and there is a less consistent pattern of development.
- Front setback minimums for ground floors in all zones should be no more than 5', with a provision for zero-lot-line buildings along transit streets and on side streets intersecting transit streets, as long as the first floor is at least 2' above grade, and upper floors in such buildings should be allowed to be at the front lot line under most conditions.
- Increasing Setbacks is terrible policy and actively makes our urban environment worse. In the powerpoint on your website, it states that we should have larger setbacks, but then in the East Portland section it states that streets are too wide. Increasing setbacks makes the physical space between buildings larger - basically making the streets feel wider. With side setbacks, we are basically mandating wasted space between buildings. Let's go back in history and learn lessons from cities around the world, and allow buildings to touch each other again. As long as there is fire separation in the code eliminating side setbacks will still be safe while allowing continual street edges that lead to better pedestrian experiences. We should reduce or eliminate all setbacks, and expand sidewalks and street plantings to reduce the road widths. Rather than take developable land on private property, we should use public land to accommodated plantings, buggers, and make our streets safer. This would be safer while addressing your goals of making streets more pedestrian focused. Building setbacks are a uniquely American Urban zoning concept that actively makes our cities less dense, less pedestrian friendly, and mandating wasted space. I strongly urge you to rethink

this as part of the BHxD. Don't increase setbacks to 10' for higher density zones next to SFH. SFH is not an efficient housing type and we need to encourage more multifamily units. Keep the code simple and have the same setbacks for all RM zones. Front lawns waste space, water, and should not be mandated in our code. Please don't increase front setbacks. Consider creating a MAXIMUM setback and have no minimum setback.

- I disagree with the rationale here. “Neighborhood Patterns” is apparently a code phrase for “deeper setbacks”, since the draft is not proposing a requirement for shallower setbacks where that is the “neighborhood pattern”. Many older apartment buildings were built right up to the front lot line, with no ill results. In fact, in many neighborhoods, that is the “neighborhood pattern” for small apartment buildings, including courtyard projects. And “matching the neighborhood” should not be supported when trying to mitigate climate change and the housing crisis with more dwelling units in closer proximity, and trying to promote a more “urban” environment as part of that. As this photo of a 2’ setback building shows, small apartment buildings with zero to 3’ setbacks are common. This is unclear to observers, as there is often an unpaved area behind the sidewalk within the Right of Way. In the photo I have shown where that is, and the results for setbacks. Other buildings were right at the property line, with few ill effects, even when there are detached houses on the same block. To require a 10’ setback unless the immediately adjacent building is closer than that is not justified by existing patterns in many neighborhoods, and this should not be required. (At a minimum, allow reduced setback if any building on the block face has a smaller setback, not just the immediately adjacent building). To satisfy “privacy” concerns, a 5’ setback of the first floor only should be sufficient, and allows use of plantings to buffer the building where the residential units are on that level. If the first floor is at least 18” (not 24”) above grade, then no setback should be required. Upper floors should always be allowed to extend (cantilevered or other means) to the street property line. This example shows a second floor that is at the front lot line, but a first floor that sets back 4’, allowing plantings in front of the windows. Street setbacks should be the same for the front, and “side”, street frontages on corner lots. On any street, there should be no setback required for a courtyard building, as long as the courtyard takes up 25% or more of one street frontage. Maximum front setbacks on Transit Streets should be reduced to 10’ in RM2, RM3 and RM4 (Klotz).
- Why?? Let developers build the envelope of the building to lot line with 1st floor setback.
- Front setbacks should be 0’ or 5’ in multi-family zones – 10’ is not needed.
- **SGNA** supports this proposal.
- I disagree. A well-designed building with zero-setback can be acceptable. We need more flexible criteria to allow for varying setbacks in varying contexts.
- This is wasted space that could be used for housing
- I **STRONGLY** disagree, as I did with a similar proposal in the RIP. Large front setbacks are anti-urban. Front yards are pointless and the increased setbacks make streets feel more suburban and less pedestrian-friendly. Furthermore, this will push buildings back to the rear setback, which is 5 feet in most places, overlooking people's private backyards.
- Please eliminate setback requirements unless necessary for safety. Reflecting neighborhood patterns is overly restrictive; if people want matchy-matchy housing, there are loads of suburban options.

- Agree
- I'd rather not force a limit along these lines.
- Probably.
- Good

14. Simplify side setback regulations and reduce barriers to development on small sites. 5-foot side and rear setbacks in most situations and allow small accessory structures like storage sheds in setbacks.

- I strongly oppose the reduction of side and rear yard setbacks to a uniform 5'. This is a major mistake and a step away from creating livable neighborhoods. The illustration on page 34 of Volume 1 significantly misrepresents the present zoning code. The regulations never require an entire façade to be setback 11', but instead product step backs, with the first 1000 square feet of façade allowed at 5', no matter how big the total façade. (see my sketch showing corrected setbacks). This 1000 sq ft façade approximates the size of a single family house, and only portions of the façade that exceed that get set back more, Under the new proposal, one could create a 85'X40' wall five feet from a property line without variation. This will be much more oppressive to the neighbors than can occur in a single family zone or under today's multi-family zones. I have attached a picture of a recently proposed project on a 50X100 lot to show how the required variable setbacks works in practice, creating variety without great cost. While the step back provisions could be simplified into perhaps only three steps, they should not be eliminated entirely. Similarly, I am concerned about the reduction of side yard setbacks to 3' for single family houses. Firstly, the shift to a scale based code means that we should not have different zoning rules for different housing types. Secondly, 3' setbacks do not allow enough area for successful landscaping and end up with dead plants, gravel, or paved areas, increasing runoff. I do think that 3' setbacks could be allowed for limited portions of buildings, and could be the starting point for step backs with a limit of 600 square feet (Rick Michaelson).
- Reduce front setbacks and side street setbacks to zero for U-shaped courtyard developments as long as the courtyard is 25% or more of the frontage, and at least 10 ft deep (**Portland for Everyone**).
- We endorse a 5 foot side setback. We oppose a 3 foot setback for single family homes on standard lots (120.220.B.3.d) as previously discussed. A 3 foot side setback for narrow lots is reasonable. This would be a significant change in our neighborhood and should have been part of the staff report (**SMILE**).
- Allow for zero side setbacks on sides adjacent to other RM-Zones or Commercial Zones provided that green space is then used elsewhere in the project (**RNA**).
- We strongly support the simplification of the side and rear setbacks. However, we recommend the setback be reduced on sites that are 10,000 SF or less that are building more than 55' tall in the RM3 and RM4. This seems excessive and complicated especially when combined with required step-downs next to single-family zones (**PCRI**).
- The language describing mandatory 10' setback on buildings 55' and taller is an abrupt change that will grossly penalize a 56' building relative to a 55' building. This language will have strange effects on narrower lots. Instead please write this to require that the portion above 55' be set back an additional 5' from the lot line.

- Side setbacks should be reduced to zero, except for lot lines adjacent to single-family zones, where they should be five feet for the floor above the first floor, and possibly greater for floors above that to preserve solar access, except in cases where the adjacent single-family zone is or intends to become a zero-lot-line development.
- Consider eliminating side setbacks. They don't have them in most European cities, Asian cities and are frankly unnecessary. They just make small dark slivers of land between buildings. Allow buildings to connect to make continuous urban street fronts.
- The side setback for single family homes on full size lots should remain at 5 feet. In the proposed zoning code (120.220.B.3.d), the side setback for single family homes is proposed to be reduced from 5 to 3 feet to improve the aesthetics of single family homes on skinny lots. As written, this provision would apply to full size lots and would reduce the side setback for a single family house on a full size lot from 5 to 3 feet. A multifamily building on a full size lot, however, would have a five foot setback. This loophole should be closed.
- I agree with the elimination of the old “table” and adoption of a uniform 5’ side setback (outside the High Opportunity area mentioned above). I disagree with the 10’ side setback for RM3 and RM4 for buildings over 55’. For those tall buildings, the 5’ side and rear setback (or zero in High Opportunity areas) should suffice until the 45’ level is reached, and then the 10’ setback can be required beyond there.
- No side setback should needs to be more than 5’ – allow 0’ side setbacks wherever practical. Side setbacks do little to decrease overall building mass and significantly reduce the usability of outdoor spaces. Allowing smaller setbacks allows the outdoor spaces on a site to be larger and more useful.
- **SGNA** supports this proposal.
- Yes.
- The setbacks should be eliminated
- Per #13 above, small rear setbacks combined with large front setbacks are poor urban design. Private backyards and pedestrian-oriented streets both suffer. Look at human development patterns back a thousands years and find that the opposite is best practice: buildings close to the street, with ample private space in the back.
- Great!
- Agree
- Yes
- Yes. Setbacks should vary by site, circumstances.
- Can you go smaller. 3-foot?
- Good

15. Require building height transitions to single-dwelling zones. Limit building height to 35 feet (three stories) within a 25-foot distance of single-dwelling zones.

- The stepdown requirement is great! Keep and enlarge.
- This is another measure that limits the development potential of sites and increases costs. I often hear city officials say, “The neighborhoods (and by this they mean well-off homeowners) won’t like that,” but I never hear that “The homeless person or family paying half their income for rent” won’t like it” because housing that could be built isn’t. **(Nick Sauvie)**

- Stepping down to 35 ft on site in RM3 & RM4 will not be feasible in many cases. Because construction techniques change, we suggest that a more realistic standard for RM3, RM4 and RMX would be stepping down to 45 ft when adjacent to neighborhood zones. Note where currently maxing out FAR through an affordable housing bonus would also max out height and building coverage limitations. In these instances, there remains close to no flexibility for any design or massing (re)distribution requirements (such as stepping down to meet the residential zone adjacency height standard). It becomes impossible - even for affordable housing builders - to meet both requirements at once. Consider providing additional height or building coverage in these instances. **(P4E)**.
- We endorse proposal 15 (height transitions) – **SMILE**
- RM1 Height Limit of 35 feet - The **UPNA LUTC** supports the 35 foot limit since it is closer to the 30 ft for R2.5 and R5 that abut the Lombard corridor.
- Things urban housing is more important than: buildings being the same height as the buildings next to them. Therefore, please: increase the maximum height limits and FAR of higher-density residential zones
- **RNA** supports as-written.
- We highly recommend increasing the step-down height in the RM3 – RX zones to 45'. The current proposal designates the step-down height to be 35'. In practical terms, this means any affordable housing project above three stories will need to step down. This change lowers the number of affordable housing units that can be produced in infill multifamily buildings and renders the remaining units less useful to residents. The 35' step-down height, as proposed, benefits adjacent sites in terms of "compatibility" at the cost of providing new, well-designed housing. Due to the building code, there is a dramatic escalation in the cost of constructing buildings over 4 stories. By eliminating area for the buildable envelope on the fourth floor, we'll need to build taller to recover lost units. This makes the entire project more expensive and less feasible. Additionally policy that regulates step-downs complicates the buildable envelope of a given site, meaning the internal layout of the building must fit within a complex shape. This is important because in designing housing there is always a trade-off between the internal layout of the building, which benefits residents, and the external form of the structure. By complicating the external form, internal elements like unit layouts, corridors, stairwells and elevators are affected. By prioritizing the external form of the building in terms of requiring step-downs, the code is prioritizing the neighbor's compatibility concerns over the well-being of the people who reside inside the building. We view the recommendation of a 45' step-down height as a compromise, as it aligns the code with building code and other cost drivers and still furnishes additional "compatibility." **(PCRI)**.
- I think the proposal of allowing matching of adjacent properties is still too strict -- a new building ought to be able to match the setback on any property on the same block face or within 200 feet.
- Step down height - 25' of adjacent residential properties is way too much of a setback for the reduced height. Consider reducing this to 15.' Again, the goal is to increase density and housing opportunity. Limiting allowable building height is not addressing those concerns. The goal isn't to cater to single-family zoning, it is to transform our city into a more urban, dense, and multi-family housing focused city. All rules should be applied evenly in all

neighborhoods. Height limits etc. should apply in the same way in both historic neighborhoods as well as in others. We aren't supposed to be building to cater to the urban environment from generations ago, but rather designing a city to accommodate future generations. Let the city evolve and grow naturally without unnecessary restrictions.

- The bonus and special bonus elements of the proposed code warrant consideration of unintentional impacts to single family residence properties. Code should contain provisions which require analysis of surrounding properties when bonus and special bonus grants are given. Because additional building heights are possible they should not be allowed directly adjacent to a single family residence property. Stepdown measures should be required when considering awarding bonuses and special bonuses near single family residences..
- Transition rules from multi-zone to single family zones is a good idea, but needs more work regarding single family homes in multifamily zones, which is common in the IHD. Note: the condos across from Safeway deal fairly well; with the transition from 5 stories on Broadway to the 2 1/2 stories on Schuyler.
- The 10' setback on lower floors when abutting single-dwelling zones can remain, but the 25' setback should start at 45' in the RM2, RM3 and RM4 zones. 45' is only 10' higher than the 35' R-2.5 zone that often abuts these zones. This provides the stepdown that is desired, with more flexibility, and avoids triggering different construction types before otherwise necessary.
- Better to allow adjacent single dwelling zones to build taller! I oppose this.
- This is overly restrictive and protectionist – especially given the housing needs the City is currently facing. If transitions are needed, upzone the adjacent single-family zone rather than decreasing the ability to develop affordable, more dense housing. SFR concerns should not outweigh the need for more housing units and options as the city grows and changes. If this section does remain, reduce the affected distance down to 5 or 10 feet.
- **SGNA** supports this proposal.
- I don't agree. In some cases, a single-dwelling zone may not always be single-dwelling in the future and we should not lock ourselves into what exists at present. I'm thinking of the building going in at SE 11th and Stephens, where the neighboring houses are not likely to always be houses.
- Reducing building height for some particular notion of aesthetics means reducing housing supply and charging people higher rents. This is not a good idea.
- That's OK.
- No, I disagree strongly with this. If there are concerns about these transition areas, we should loosen restrictions in single-dwelling zones rather than further limiting supply of new homes in our few relatively high-density areas. The "centers and corridors" approach is a cowardly approach to planning that avoids addressing the racist exclusionary zoning of single-dwelling zones. Allowing most multi-family housing only on "corridors" means that our most affordable homes are on our most dangerous streets (lots of crashes) with the worst air quality. This perpetuates land use planning's shameful history.
- Agree
- Maybe,... but this can't apply to buildings that face out onto busy streets with a bus line. These are the streets that are ideal for taller buildings.
- Not sure. tall buildings shade neighboring gardens, etc.

- Ugh. Transitions are fine and make an area interesting. Let's not limit opportunities to make more housing just b/c there's a luxurious single family home nearby.
- Good

16. Require large building facades to be divided into smaller components.

- We endorse proposal 16 (division of large building facades) – **SMILE**
- Would like to see the requirements reduced from 100' to 50'; meaning 50' frontages wouldn't need a notch, but anything larger would. This opinion is shared both by the RNA and the Division Design Initiative (**RNA**).
- The 10' wide "notch" every 100', with a 30' depth is unnecessary to achieve the purpose here. A 5' wide notch with 2' of depth will suffice to "break up the façade" and will simplify building construction and not remove as many units of needed housing.
- Lovely.
- **SGNA** supports this proposal.
- Sounds good.
- Unsure/unclear why this is necessary. Personally, I'm a fan of modern minimalist design aesthetic, especially when paired with natural materials.
- Sure whatever, if this makes people happy.
- Don't care
- A little vague, but I think I generally agree.
- Yes! Even if separate, the units could be more affordable and have smaller housing options.
- Why? Let large buildings figure it out.
- Good

East Portland Standards and Street Connections

- IT IS COMPLETELY MISGUIDED & UNJUST THAT THE PSC IS PUSHING TO MAKE E PORTLAND DENSE & DENSER WHILE THE WESTSIDE IS PERMITTED TO RETAIN ITS CHARACTER & SPACES.

17. Continue East Portland mid-block open areas through requirements for deep rear setbacks.

Require rear setbacks equivalent to 25 percent of site depth to keep the centers of blocks greener and less built up.

- Designers should have flexibility to take advantage of the physical features of various sites. This may or may not be at the rear of the site. This is also a clear disincentive to development in East Portland, which shouldn't be penalized for decades of disinvestment and poor government decision-making. (**Nick Sauvie**)
- We appreciate East Portland's unique design and development challenges, but we ask staff to consider how well-intentioned requirements might, all told, result in the provision of less housing and especially less affordable housing in East Portland. Specifically: The image featured on BHD materials, Leander Court developed by ROSE Community Development, would not be allowed under the standards proposed in this BHD Discussion Draft: Development stretches back too deep on the lot, into what is proposed to be required center-block open space. While opening up the middle of East Portland blocks should be encouraged in some cases to promote better connectivity, there are also cases where

making this a requirement will result in many projects that are well-suited to deeper lots becoming infeasible. **(Portland for Everyone).**

- Identifying the special needs of East Portland is an important new innovation for the zoning code. Its different street patterns and deeper lots, many with significant tree stands, demand different solutions. The solutions proposed appear to be well conceived and address the very real problems this area has experienced. The proposals for requiring deep rear setbacks are particularly important given the types of development that have occurred recently **(UDP).**
- These seem at odds with the desire to have rear-lot street connections and could result in less courtyards and other more observable space nearer to the apartments. Other options should be considered. Getting full street connections should be sought, and incentivized. Narrower, pedestrian-only connections are often not a safe place to be, and should be kept no longer than 25', with a minimum width of 20', with no low plantings, only pruned-up trees and ground cover, to provide good visibility and safety.
- This is a difficult issue to solve and needs further thought and development. The City should be more bold in the approach to East Portland and needed street connections. Find ways to add alleys and street connections in the near term.
- **SGNA** takes no position on this proposal.
- I disagree. There are places where maybe the whole block will be built up and we need the housing.
- This is wasted space that should be available for a city
- Good idea.
- While I'm in favor of keeping blocks greener, the drawing detail shows this configuration would require removing the gap in-between units. For livability considerations, I think windows on each side would be better than no gap between units, especially considering the internal units. Having lived in a 6-unit 1 story row house, I missed having windows on both sides. If building for a no-gap scenario, I'd suggest requiring skylights or small decks to provide access to the outdoors.
- No, please just build public parks rather than mandate big privately owned backyards.
- Agree
- I'm not sure how this could work given that it seems to be the case that there is an interest in also allowing folks to have ADU's on their property.
- Sure.
- Nope. Let's fill rear areas in with ADUs.
- Good

18. Require street frontages wide enough for quality site design and to provide space for new street connections in East Portland centers. Require a minimum street frontage width of 90 feet for development in multi-dwelling zones in East Portland centers.

- This seems a difficult standard to meet because of the real estate market. Determine if anything will get built in these areas before adopting this standard.
- **SGNA** takes no position on this proposal.
- No, I disagree. Development of sites must be case by case.

- At the open house the reason brought up for this was that parking and/or driveways would take up too much of frontage. I think the better solution is to not require parking when a site is within walking distance of a frequent service transit stop.
- That's probably too wide. Owners of 50'-wide lots are punished.
- Great!
- Agree
- I don't understand this question.
- sounds reasonable.
- Good

19. Calculate development allowances prior to street dedication to facilitate street connections.

- Agree.
- **SGNA** takes no position on this proposal.
- This is a good idea
- Agreed.
- Great!
- Agree
- Sounds good.
- Yes.
- Good

Other Major Proposed Amendments

20. Strengthen minimum density requirements. All new development will need to meet minimum density requirements (exceptions provided for adding accessory dwelling units to existing houses and for historic resources).

- I am writing in support of the proposed height increases in the proposed zones for multi-family housing developments. The only way our community can meet future housing needs and increase density within the Urban Growth boundary is to go UP.
- **SGNA** also is concerned that the proposed minimum density requirement may lead to an acceleration of SFR demolitions. We would like the City to consider language that would exempt this requirement for property owners that retrofit existing structures to add living quarters in existing homes by converting them to boarding houses, co-housing, or stand alone apartments. A standard for such conversions is needed so that owners of older single-family structures have an incentive to consider retrofitting these buildings by meeting reasonable MFR density targets.
- Increase both minimum densities and maximum FAR for most multi-dwelling zones so they are appreciably different from what staff is already considering throughout Portland's residential neighborhoods. Modify the following zone standards to: RM1 - One unit per 2,500 sf, RM2 - One unit per 1,000 sf, with base FAR of 2.5:1 and bonus FAR of 3.5:1, RM3 & RM4 - One unit per 750 sf, with base FAR of 3:1 and bonus FAR of 5:1. RM2 zones mapped on Transit Streets and near Mixed Use Zones should have comparable FAR and heights, rather than the lack of transition and "gap tooth" effect that is zoned for currently (**P4E**).

- Minimum density requirements certainly need to be strengthened in order to help create more complete communities in this area of large blocks and scattered development patterns. **(UDP)**.
- RNA supports as-written.
- Increase “Minimum Density” in RM1 through RM3 by 50% over the proposal, and by 100% (double) in RM4.
- Minimum Density should be set as high as possible. We need to get more housing built and having high minimal density is a great start. Don't reduce minimum density for tree preservation. We need more housing. Trees are great and important, but that is why we have an Urban Growth Boundary and parks. Land for housing is already limited and we need to maximize its use for housing.
- I agree with the concept proposed here regarding adding to existing buildings, but would exempt development on lots of 7500 s.f. or less. Raise minimum densities: The minimum densities in all of these zones are too low, and will allow rowhouses and even detached houses where they are not desired. Raise the minimum unit numbers in RM2 to “1 unit per 1000 s.f.”. Minimum unit numbers in RM3 and RM4 should be “1 unit per 750 s.f.” of lot.
- Yes!
- Add an exception to the requirement to bring a site all the way to the minimum density for sites under 7,500 SF with an existing house. I appreciate the change, and understand the need to close the loophole of keeping an existing house and not bringing a site up to the required minimum density. At the same time, this piece will decrease the ability of a non-developer who owns a home in a multi-dwelling zone to add units to their property over time. The current proposal may require such a homeowner to add more units than they could afford, limiting their ability to make any increase of units on the site.
- **SGNA** is concerned that this requirement will lead to an acceleration of SFR demolitions. We would like the City to consider language that would exempt this requirement for property owners that retrofit existing structure to add living spaces in existing homes by converting them to boarding houses, co-housing, etc. Adopt a minimum standard for such conversions so that the exemption applies to larger structures that meet reasonable MFR density targets.
- Yes.
- Honestly, there's not a good reason for this. Let the market perform its work for demand at the particular site.
- Disagree. Residents of single-family detached neighborhoods that have been unwillingly zoned higher should still be able to replace their house with another house. How about focus more on siting detached homes on the property so that future development is not precluded?
- Great!
- No
- Yes, but how this will work along with the earlier questions regarding setback minimums is a big question.
- yes, certain sites should get priority, or best use protocols. In Seattle, the city has identified certain properties to be used for building low income housing.
- Yesssssss. Let's get dense!

- Good

21. **Require Transportation and Parking Demand Management approaches.** In all the multi-dwelling zones (except RM1) in locations close to frequent transit, this will require projects that add 10 or more units to use strategies to reduce transportation impacts, such as by providing residents with transit passes, bike share, or car share memberships, and information on transportation options.

- **SGNA** has reservations about the proposal to require that large MFR developments need to include a TDM program. We feel that the City needs to do more to provide incentives to residents in all MFR districts to abandon their cars. Design guidelines should encourage taxi/car share pick up/drop-off locations, short duration car share services, and transit pass discounts, to name a few. The financial burden that the proposed requirement imposes on large private MFR development is likely to hurt the affordable housing aims the City seeks. The City should adopt incentives and fund programs that help offset part of the financial burden that the TDM requirement will impose on large scale MFR development. We would rather see the City approach this issue systemically in all multi-family residential districts and not just target large developments.
- Parking demand management approaches that are tailored to this area are also needed **(UDP)**.
- TDM should apply to all zones or to all building types it is appropriate for regardless of zone. TDM applies to RM2 developments of greater than 10 units but development in RM1 is exempt from TDM. Thus, a 15-unit development in RM1 would not have a TDM requirement but an identical development in RM2 would. Because TDM is required in mixed use zones, construction of dense apartments would be more economical in RM1 than RM2 and mixed use zones. At the February 19, 2018 Southeast Uplift Land Use and Transportation Committee meeting, BHD explained that TDM would not be appropriate for townhomes and thus it was not applied to RM1. Apartment buildings can be built in RM1 and townhomes can be built in RM2, so limiting TDM based on zoning rather than building type would be illogical and ineffective **(SMILE)**.
- The **UPNA LUTC** requests that the requirement for TDM (Transportation Demand Management) be extended to RM1 and RM2. Since the RM1 and RM2 that will be near transit lines such as Lombard already are not required to have off-street parking, requiring TDM will advance the goals of the Portland & Comprehensive Plans to increase transit and active transportation usage or modal split.
- While we like the idea, it should be for a longer term and more than just bus passes. Or we should approach parking strategies better to prevent abuse of free parking and let the markets decide how to get best incentivize people to live in units without parking **(RNA)**.
- While we appreciate the effort to coordinate across bureaus and agencies with this item, we are concerned about the cost burden associated with this for affordable housing developers as well as the one-off impact of the policy as written. We would encourage staff to continue conversations with agencies such as TriMet and PBOT to come up with incentive programs that cross bureaus without burdening affordable housing developers with solutions such as those proposed. **(PCRI)**

- TDM should apply to all zones and to all building types -- it is appropriate regardless of zone, given the amount of on-street parking already existing in the area from Tillamook South, which will worsen as the Comp Plan and its component pieces kick in.
- This plan is well-meaning, but really only serves to increase the price of housing, and disadvantage those who walk or bike for transportation, and should be dropped.
- This works best if no parking is required. Revenue from residential permit zones should be used for this when possible.
- Overly burdensome and creates a perverse incentive to build further from frequent transit.
- AND PARKING.
- **SGNA** supports this proposal with the caveat that placing all the burden to subsidize transportation options on the developer will impact affordability. As a convergent policy action, identify and fund initiatives using public resources that can be paired with private funds to support this requirement.
- Yes.
- This really shouldn't be a requirement for new developments, it just means people in older buildings lose out. It should be a general requirement.
- I like this, however 500 feet is very short, I think we should be lowering parking requirements further and expanding TDM to sites within a half mile (less than a 10 minute walk) of frequent service transit stops.
- Yes, strongly agree.
- While developers offering residents transit passes is a nice perk, I am skeptical that it would offset the use of personal transport, and alleviate additional parking in the neighborhood. In addition, access to public transit in areas of SE Portland lack basic safety for both pedestrians and cyclists.
- Great, but this matters far less than making sure that we eliminate minimum parking requirements.
- Agree
- Of course, but as I responded earlier, Tri-Met also needs to step up and improve overall performance.
- Yes, but this is tricky.
- I don't know if this is really necessary. Seems like you should just adequately price street parking and the rest should work out. People will figure out which transportation mode to take and right now with all the free parking and subsidized parking structures, cars make the most sense. If we start using demand management and price appropriately, people will drive less and they won't need their apartment to provide other options.
- Good

Zoning Map Amendments

22. Combine the R3 and R2 zones into the new RM1 zone (35-foot maximum height, intended for two- to three-story buildings compatible in scale with residential neighborhoods).

- While I support the effort to simplify the code, I am not convinced that merging the R3 and R2 zones into RM1 is the right way to go. Given the origin of the two zones- one in the city

and the other in the county- I think that the proposal understates the character differences of the two zones – one urban and the other suburban. It might make more sense to merge the R3 and the R2.5 zones and leave the R2 zone alone.

- It is great that you are eliminating the R3 zone. Thanks! Can we simplify the naming of the new zones? We need to make our zoning code easier to understand not more difficult. Recommendation: RM1 = 1 FAR, RM2 = 2 FAR, RM3 = 3 FAR, RM4 = 4 FAR. Simple, intuitive, logical naming will go a long way to making our code more approachable. The FAR is slightly increased from your existing proposal, but we are desperate for new housing and allowing more dense developments is more sustainable, practical, and affordable. After all, Portland is a city, not a town, and even in East Portland, we could use more urban style developments to provide business and housing opportunities. Within the UGB we need to drastically increase allowable FAR to prevent further urban sprawl.
- Max heights should not be reduced at a time that we need more housing in the city. RM1 max height should be 40 or 45-feet.
- Don't label this a zone of two- to three-story buildings if developers can build higher with a density bonus - that would be DEEPLY DISHONEST.
- **SGNA** supports this proposal.
- Yes, in favor.
- Get rid of these restrictive zones
- OK.
- Fine
- Agree
- As long as this doesn't restrict taller buildings on through streets and along bus/train lines, then sure.
- Not sure.
- Good

23. Expand the design overlay to the all the RH zone (new RM3 and RM4 zones).

- **SGNA** supports this proposal.
- The so-called overlay should be expanded to the entire city. Especially east of SE 82nd, we need greater density not only to make housing more affordable, but so that we can get more Tri-met lines out there.
- OK.
- Fine
- Agree
- Not sure if I understand this question either.
- Not sure.
- Good

Other Comments

- I would like to see more attention paid to design guidance in areas of the City that are not flat. This draft almost exclusively in its discussion and examples describes conditions common to the flat terrain of Portland east of the river. It does not appear that design for

- the topography of the west hill is given consideration. Good design for the hills may look quite different.
- Lastly, **SGNA** would like to see the City develop metrics for the BHBD project and monitor if the changes are having the desired effect. The program includes a specific set of goals. These need to be expressed in quantitative measurable terms so that over time we can monitor if it is working. There is no discussion of this in the program.
 - I think more testing needs to be done on the project's impact on inner city areas. For example, the report states that R2 zone is primarily used as a transition between single family zones and higher density zoning. That is simply not true in NW where the R2 zone is used in a large area with a mixed residential character.
 - 33.120.215 C – Exceptions to Height limits – I support allowing a height exception for parapets and railings. It will allow better design and more useful rooftops. However, I think the exceptions need to go further and except OSHA required railings without getting adjustments. If the equipment is allowed, than the required screening should also be allowed (Rick Michaelson).
 - In addition, the City should develop a long-term strategy to site, fund, and build more public parks in East Portland, independent of zoning and building requirements (**Portland for Everyone**).
 - The City should focus on fleshing out a reasonable BHD, and move RIP to another day.