

Amy Ruiz

#335197 | October 30, 2024

Testimony to **Portland City Council** on the **Housing Adjustments Compliance Project, Recommended Draft**

Please see the attached letter from Oregon Smart Growth, Portland Metro Chamber, Home Building Association of Greater Portland, Portland Metropolitan Association of Realtors®, Multifamily NW, and BOMA Oregon in support of a recommendation the Planning Commission made regarding height in the Central City Plan, and a similar proposed change to the Floor Area Ratio (FAR) requirements, as part of the Housing Adjustments Compliance Project.

Testimony is presented without formatting.



October 29, 2024

Mayor Ted Wheeler
Commissioner Rene Gonzalez
Commissioner Mingus Mapps
Commissioner Carmen Rubio
Commissioner Dan Ryan

Re: Housing Adjustments Compliance Project

Dear Mayor Wheeler and City Commissioners,

We represent a broad-based coalition of organizations who believe revitalization and activation within the Downtown core is paramount to ensure the City of Portland has the resources to support our most vulnerable residents and the housing necessary to accommodate those that wish to live in our urban center.

To that end, we strongly encourage the City Council to fully embrace the common sense recommendation the Planning Commission made regarding height in the Central City Plan, and adopt, as a logical extension, a similar change to the Floor Area Ratio (FAR) requirements, as part of the Housing Adjustments Compliance Project. Doing so will serve as an enthusiastic acknowledgement that Portland is fully committed to building out an equitable future with abundant housing for all.

Approximately 100,000 fewer people commute Downtown on the average weekday compared with 2019. This huge drop in the daily population in the Central City has created strong headwinds for the city’s economy, budget, and reputation. As you know, the lack of foot traffic has reduced demand for the small businesses there, many of which have closed, which further discourages people from coming Downtown. One of the ways to escape this cycle is to encourage more people to live Downtown. This will increase support for businesses, public transit, and revitalize this critical area.

Until 1979, downtown Portland had no height limits at all. Of the 24 Downtown towers 250-feet or taller, only twelve have included homes and, of those, seven were either built to the maximum allowable height or received adjustments or exceptions allowing them to exceed it. This history suggests that allowing taller buildings in central Portland will encourage development of residential towers at some point when the economics are favorable. Let's get ahead of these policy changes now and not miss the future opportunities.

The Planning Commission recently recognized the critical importance of tall buildings in the Downtown core and unanimously recommended that Portland allow for project applicants to propose tall buildings without having to go through a complicated and extremely costly Comprehensive Plan amendment process. This simple change will save hundreds of thousands of dollars in bureaucratic paperwork and let the housing community know that — despite rumors to the contrary — Portland wants to partner on exciting, catalytic projects.

Despite the Planning Commission's fantastic recommendation, this change will only lead to real transformative opportunities when coupled with a related change in the way we manage permissible square footage or Floor Area Ratio (FAR). Unlike most cities in Oregon, Portland regulates building size both with tools to restrict the exterior of buildings (i.e. height limits, setback requirements, glazing standards, etc.) and the interior of buildings. The Central City Plan's tight limit on FAR means that developers could be permitted to build tall buildings, without being permitted to fill them with usable space. Needless to say, this is counterproductive to the City's goals.

We are now over a decade into Portland's officially declared housing crisis. We must work with increased urgency to address our housing deficit and encourage meaningful investment in the form of tall buildings in our downtown core. Doing so will have positive effects and ensure that Portland can continue to grow and thrive. For this reason, we strongly encourage you to agree with the Planning Commission's recommendation and invite new construction into the Downtown core.

Historic Landmarks Commission

#335195 | October 28, 2024

Testimony to **Portland City Council** on the **Housing Adjustments Compliance Project, Recommended Draft**

Please see the attached testimony from the Historic Landmarks Commission

Testimony is presented without formatting.

Date: October 28, 2024
To: City Council
Cc: Phil Nameny, Bureau of Planning & Sustainability (BPS)
From: Portland Historic Landmarks Commission (PHLC)
Re: Housing Adjustments Compliance Project (HACP) Recommended Draft

Dear City Council:

The Historic Landmarks Commission has been briefed on the HACP related to Senate Bill 1537 by senior staff of the Bureau of Planning and Sustainability (BPS) on October 14th. **We are in support of allowances for additional housing units in Portland's Central City where new growth is to be focused.**

We offer this recommendation:

1. **We concur with bullet A of the Design Commission's letter in support for meeting the state mandate for limiting Adjustments to 20% or 1 story** until such time as an appropriate analysis can be conducted on the impact of additional height allowances. We understand such analysis will be part of a future Central City refinement code project.
2. **Historic Districts in Central City require special consideration:**
 - Upzoning incentivizes demolition. In addition to the loss of unique and beloved neighborhood identity, view corridors and shadow impacts, the significant carbon emissions impact of demolition works against the City's sustainability goals.
 - Upzoning increases land costs, which in turn significantly increases the cost of development. We question whether this additional height will actually improve affordability of the resulting housing.
 - A policy to allow unlimited height may well create false expectations for developers seeking additional height in historic districts and sets up a conflict when proposals fail to meet approval criteria and design guidelines.
3. Finally, the **lack of public engagement** or input prior to the Planning Commission vote sets a bad precedent, especially for decisions whose impact will affect the built environment for 50+ years.

Thank you for your consideration for how this policy will impact Portland's historic resources.

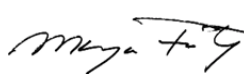
Sincerely,



Andrew Smith



Peggy Moretti



Maya Foty



Hannah Bronfman



Hugo Hamblin-Agosto

This letter represents the comments from the commissioners present at the October 28, 2024 meeting.

Design Commission Chair Brian McCarter

#335194 | October 28, 2024

Testimony to **Portland City Council** on the **Housing Adjustments Compliance Project, Recommended Draft**

Date: October 24, 2024 To: Portland City Council From: Portland Design Commission Re: Housing Adjustment Compliance Project (HACP) Mayor Ted Wheeler and Commissioners Gonzalez, Mapps, Rubio, and Ryan: Thank you for taking our testimony. The Design Commission has been briefed on the Housing Adjustment Compliance Project (HACP) related to Senate Bill 1537 by Phil Nameny of the Bureau of Planning and Sustainability (BPS) at our October 3, 2024, Design Commission hearing. We are in support of allowances for additional housing units in Portland's design overlay zones, where new growth is to be focused. In summary, we offer this recommendation: A. The Design Commission supports the original proposal from the State of Oregon and the Bureau of Planning and Sustainability where: • 75% of the floor area is residential, • Adjustments must be allowed to both base and bonus heights of up to 20% of the base height or 1 story, whichever is more, and • Consider 1 story to be equivalent to 10 feet vertically. B. In regard to the Planning Commission (PC) amendment for unlimited height in the Central City Plan District, the Design Commission is concerned that the amendment is being put forward in the absence of any analysis on impacts to shadow on open spaces, impacts to established view corridors, and even impacts to yet-to-be-determined spaces. If Portland City Council would like to entertain unlimited height in Central City, then we request your consideration of the following options: • Pause on the implementation to allow BPS staff to conduct an analysis of impacts on open space, view corridors, etc. during their upcoming Central City legislative project and direct BPS staff to incorporate well-vetted revisions to height in that legislative project, or • Allow height adjustments GREATER THAN 20% of base height with a mandatory Type III land use review with the Design Commission, or • Allow height adjustments GREATER THAN 20% of base height with a mandatory Design Advice Request meeting prior to submitting for a land use review. The potential unintended consequences of blocked scenic view corridors and shading of parks and public open spaces in Central City would be a permanent impact to our downtown's most special places. The effects of the PC's amendment should be carefully studied, or at least the Design Commission should be engaged to ensure our involvement in these large-scale Central City developments. Thank you for your consideration, the Portland Design Commission Brian McCarter, Chair Chandra Robinson, Vice-Chair Sam Rodriguez, Past-Chair Joe Swank Zari Santner Sara Vaz Tina Bue

Testimony is presented without formatting.

Date: October 24, 2024
To: Portland City Council
From: Portland Design Commission
Re: Housing Adjustment Compliance Project (HACP)

Mayor Ted Wheeler and Commissioners Gonzalez, Mapps, Rubio, and Ryan:

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In summary, we offer this recommendation:

- A. The Design Commission supports the original proposal from the State of Oregon and the Bureau of Planning and Sustainability** where:
- 75% of the floor area is residential,
 - Adjustments must be allowed to both base and bonus heights of up to 20% of the base height or 1 story, whichever is more, and
 - Consider 1 story to be equivalent to 10 feet vertically.
- B. In regard to the Planning Commission (PC) amendment for unlimited height in the Central City Plan District**, the Design Commission is concerned that the amendment is being put forward in the absence of any analysis on impacts to shadow on open spaces, impacts to established view corridors, and even impacts to yet-to-be-determined spaces. If Portland City Council would like to entertain unlimited height in Central City, then we request your consideration of the following options:
- Pause on the implementation to allow BPS staff to conduct an analysis of impacts on open space, view corridors, etc. during their upcoming Central City legislative project and direct BPS staff to incorporate well-vetted revisions to height in that legislative project, or
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 - Allow height adjustments GREATER THAN 20% of base height with a mandatory Design Advice Request meeting prior to submitting for a land use review.

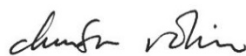
The potential unintended consequences of blocked scenic view corridors and shading of parks and public open spaces in Central City would be a permanent impact to our downtown's most special places. The effects of the PC's amendment should be carefully studied, or at least the Design Commission should be engaged to ensure our involvement in these large-scale Central City developments.

Thank you for your consideration, the Portland Design Commission

Brian McCarter, Chair

Chandra Robinson, Vice-Chair

Sam Rodriguez, Past-Chair



Joe Swank

Zari Santner

Sara Vaz

Tina Bue



David Dysert

#335193 | October 25, 2024

Testimony to **Portland City Council** on the **Housing Adjustments Compliance Project, Recommended Draft**

Please see attached letter

Testimony is presented without formatting.



October 24th, 2024

To: Portland City Council, Portland Bureau of Planning & Sustainability
From: Pearl District Neighborhood Association
Re: Unlimited Height Amendment to Housing Adjustment Compliance Project

The PDNA Planning & Transportation Committee recognizes the role the Central City and the Pearl District play in accommodating regional growth. The Pearl District was designed to be a dense, mixed use, urban neighborhood and we have a strong record of supporting large scale development. We are not afraid of density nor height; we welcome it. Yet even in the best of times, we've seen maximum height left on the table.

The Planning Commission's recommended amendment to the Housing Adjustment Compliance Project is an ineffective tool for generating housing production in the Central City. Height limits are not the barrier to housing production, especially affordable housing production. Economics is the chief obstacle here.

Portland has small blocks and building tall buildings on small floorplates is one of the most cost prohibitive construction types. Affordable projects will not pencil. Even luxury sector development does not pencil in this economic environment. Portland rents cannot support current costs.

Offering unlimited height as a knee jerk reaction to Senate Bill 1537 without any due diligence on efficacy or respect to public process sets a bad precedent. It is irresponsible to suggest the current code is the problem to Portland's housing challenges. If Portland wants to send a loud message that it's open for business, we should be focusing on what actually caused our reputational damage.

We respectfully request the City Council and the bureaus spend their time and resources on practical measures that will generate needed housing production.

Respectfully,

David Dysert
President
Planning & Transportation Chair
Pearl District Neighborhood Association

Portland City Council Meeting
Wednesday, October 30, 2024 - 2:00 p.m.
Verbal Testimony

	Agenda Item	Name
1	946	Saurav Palla
2	946	Design Commission Chair Brian McCarter
3	946	Design Commissioner Joe Swank
4	946	Iain MacKenzie
5	946	Andrew Smith Historic Landmarks Commission Chair
6	946	Ezra Hammer
7	946	Don Sowieja
8	946	Michael Andersen