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Primary objective of City: Absorb all new residents without involuntary displacement of any existing residents in a way that reduces our collective impact on the surrounding environment.

Housing density

Being that Portland is landlocked on all sides, to absorb future growth we must implicitly allow development to occur at higher densities. If we fail to allow high enough overall densities to absorb new growth, the value of land will skyrocket as we have seen in other large cities such as San Francisco, which is notoriously expensive, and existing residents will be involuntarily displaced from the City by those who can afford to live here. If our goal is to concentrate higher densities in areas that have supporting infrastructure - which it should be - rather than allow density to spread through all of the city uniformly, we must have the will to increase densities to *as much as the market will bear in the areas that can support it*. There is no middle ground: we either build enough to meet demand, or lower- and middle-income residents will be displaced. Of course, as mentioned, failing to meet the demand will, by restricting supply, increase property values, which in nearly any context is viewed as a positive outcome by landowners. We must have the will to balance the desires of landowners with the needs of renters, and not elevate one class of citizen over another. Additionally, increasing density has the effect of spreading the cost of infrastructure - and land values - across more citizens, making the City better able to handle the costs of maintaining that infrastructure, and ensuring that the market can respond to the needs of residents by providing housing on higher-value land at a price that can be more easily afforded by regular people.

The zoning map should be modified to remove R1 designations from properties along frequent service transit lines and replaced with CS or CG. The City's definition of "frequent service" should be legally indexed to Trimet's (or Metro's) definition to avoid confusion. Very intense FARs should be allowed at any property with pedestrian access within 1000 feet walking distance of two different frequent service routes. Adjustments should be allowed if developers guarantee to provide new pedestrian access points to a property or infrastructure that will place the property within 1000 feet walking distance from two or more frequent service routes.

Given that the objective of the City is to avoid involuntary displacement of residents, and that density must be increased as much as possible in concentrated areas to because we have a goal to preserve a large stock of single-family housing, we should award very substantial FAR bonuses to developers who provide certain types of amenities. For example, improving nearby transit stops or daylighting a buried stream. Low-income housing units should not count against FAR and should also result in a FAR bonus, to encourage even greater housing densities and a greater supply of sub-market rate housing to better prevent involuntary displacement.

We should avoid arbitrary aesthetic regulations that have the effect of reducing the development capacity of land, especially in areas where we have or intend to provide high-quality transit and world class active-transportation facilities. The Downtown core, North Pearl area, and Conway

properties should effectively have no height limits. The previous Central City Plan was written in a different era, for a different set of Portland residents with different needs. The Central City Plan helped us get here, but it won't help us to move forward effectively. There is no reason save for sentimentality why we should continue to impose the outdated restrictions on building height found in the Central City Plan. I applaud the draft CC2035 West Quadrant Plan to substantially increase the number of properties where we allow the maximum FARs in the City, but we should leave ourselves room to do and allow even more. We have a housing supply crisis and it is incredibly selfish - even inhuman - to use aesthetics of development as an argument to reduce the supply of housing in areas that can support it when our neighbors are being involuntarily displaced from their homes because of the already constrained supply.

With that said, it is not essential to build tall to achieve density. We do not need to be a tall city and we do not need height for the sake of height. We need to build land *to capacity* with a diverse building stock that appeals to different prospective tenants and customers. In some cases, those will be tall buildings, and we do not want to discourage that or arbitrarily restrict where those buildings can be located.

Ease of permitting multi family housing

For nearly five years our City has maintained one of the lowest rental vacancy rates in the United States, at around 3%. This is, quite simply, the result of both being very desirable City and failing to increase the supply of rental housing to meet the demand. In spite of the demands by existing landowners in the City to slow the increase of the rental housing supply - landowners who have stable living conditions and are not at imminent risk of displacement - with the current pace of growth in the housing supply we have only managed to tread water.

Rents have been increasing in Portland much faster than the national average, which has had and continues to have the very real effect of involuntarily displacing residents. While we delay the inevitable and appropriate response, our neighbors are being forced from their homes.

Being a desirable place to live will attract new residents and businesses hoping to employ those residents. This is a great problem to have. Unfortunately we are being far too slow in our response to prevent existing residents from being displaced. The Comprehensive Plan should contain or allow for provisions that act to speed the response to a housing supply crisis like the one we presently face. Building permits should be issued more quickly and other bureaucratic hurdles should be automatically smoothed or eliminated if the rental vacancy rate and average rent prices exceed certain thresholds. As mentioned, our top goal should be preventing the involuntary displacement of residents.

Parking minimums

Requiring off-street vehicle storage to be included in new developments is contradictory to our goals of supplying less-expensive housing for lower- and middle-income residents. Private vehicles consume a vast amount of space, which reduces the space available to rent, which pushes up the cost of the remaining units to offset the cost of the lost income from the lost rental space(s), not to mention the added cost of constructing those parking spaces. Lower- and middle-income residents should not be required to pay for the storage of their neighbors' private

vehicles, and they should not be forced to have their own private vehicles, as this creates a huge and unnecessary financial burden on lower- and middle-income households.

Forcing developers to spend money to construct parking not demanded by the market creates an incentive for developers/investors to seek higher rents to offset the cost of providing that parking. People who can afford to pay higher rents often have privately owned vehicles for which they seek secure storage. These tenants will often choose to use their privately owned vehicles for transportation, whereas a tenant who does not have a private vehicle will not have a choice to make. This will create an environment where there is more traffic and higher-carbon consumption than a development that is not forced to provide parking.

it should be official City policy that the loss of unmetered on-street parking spaces should never be allowed to be considered as a factor against a development or right-of-way improvement. We must also restore the previous standard of a minimum of zero parking spaces allowed for any development.

Nature in the city

Portland is a biophilic city and the Comprehensive Plan should embrace all that means.

The Comprehensive Plan should contain strong language to guarantee future development does not negatively impact wildlife that lives in and/or travels through the urbanized areas of the City. There should be a strong emphasis on providing safe travel corridors and a minimum of distractions (e.g., skyward-facing lights at night) for wildlife, including safe access to the Willamette River from Forest Park and other wildlife habitat.

Part of humans embracing nature is that some of us choose to bring animals into our homes as family members. No City resident should have to choose between a member of their family and a roof over their head. Legal and responsible pet ownership should be embraced and encouraged. One way to achieve this would be to ban landlord discrimination against renters with non-agricultural/non-exotic pets by making unlawful: residency of pets in rental units, breed restrictions, and charging pet rent; provided that tenant has liability insurance to cover any damages or injury as a result of the pet's presence on the rental property. One option for an alternative would be licensed/certified allergen-free rental units that do not allow resident pets, smoking, or other activities, and include higher-quality air filters and other amenities to provide renters with allergies or breathing problems the option of a safe haven at home.

Green streets are an excellent opportunity for more wildlife in a safe environment, closer to home. We should do more to encourage world-class green street designs that prioritize the green over access by automobile.

Self sustained buildings

Over the long term, we should have the goal of a built environment that helps the environment more than it hurts it. The Living Building standards are a comprehensive set of standards that enable a building to do just that. Over time, we should incorporate an increasing subset of Living Building standards into our commercial building code to ensure that we progress towards this objective without discouraging development by imposing expensive requirements all at once.

This should allow the market time to respond with more cost-effective means of achieving the desired goal.

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