



January 13, 2015

Housing Land Advocates
c/o Jennifer Bragar
Garvey Schubert Barer
121 SW Morrison Street, 11th Floor
Portland, OR 97204

VIA EMAIL AND US MAIL

Planning and Sustainability Commission
1900 SW 4th Avenue, Suite 7100
Portland, OR 97201

RE: Comprehensive Plan Testimony – Change #133

To Whom It May Concern,

Housing Land Advocates (HLA) is a non-profit organization that advocates for land use policies and practices that ensure an adequate and appropriate supply of affordable housing for all Oregonians. Housing Land Advocates opposes the City's current proposal to lower allowed densities in the Eastmoreland neighborhood, on equity grounds. The Eastmoreland proposal, listed in the City's comprehensive plan materials as proposed change #133, would increase minimum lot sizes and "down zone" the neighborhood from R5 to R7. This is exactly the opposite decision the City should be making in order to make housing in Portland more accessible and affordable to all citizens.

Increasing minimum lot sizes and locking into place the large-lot, single-family pattern of existing housing increases the cost of housing, both in Eastmoreland and citywide. On a neighborhood level, the proposed change would have the effect of reducing the housing capacity. Citywide, because there is a fixed amount of urban land available for development, constricting supply increases the cost of housing for everyone. Reducing housing capacity in one neighborhood results in price increases and redevelopment pressure on other neighborhoods, and as a result perpetuates gentrification and displacement. Many other neighborhoods in Portland have been similarly faced with rising land values and redevelopment pressure, but they do not receive special treatment that guarantees their preservation at current densities.

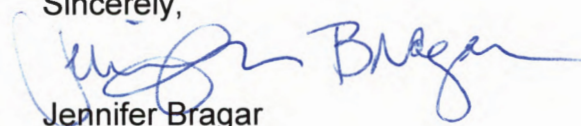
Additionally, Eastmoreland is a close-in neighborhood, very well served by urban services. It has a prime location close to downtown, plentiful open space, quality schools, and is next to a new light rail station at SE Bybee and SE McLoughlin

Boulevard. Maximizing this investment in urban services would indicate land that should be up-zoned to greater densities, not the reverse.

The listed rationale for the change is that it is intended to “match designation with on-the-ground development in neighborhoods, parks, and open space.” Existing development patterns are not sacrosanct, and were not a major consideration for zoning changes when they occurred in East Portland, the Pearl District, or many other Portland neighborhoods. Where select other areas of the City have been designated for reduced housing capacity, it has been a trade-off against other constraints. For example, areas of East Portland do not have adequate school capacity or sidewalk infrastructure, and would be over-burdened if built out to existing zoning allowances. Hillside areas near the zoo and Powell Butte would be vulnerable to landslides and flooding if fully built out. The proposed down zone in Eastmoreland has no such rationale, other than vague references to “neighborhood character” and historic development patterns.

Neighborhood concerns about historic character, building design, and compatibility can be more appropriately addressed with other tools. These include instituting a historic district with design review, or modifying development standards within the zoning categories. A blanket down-zoning to keep out new development raises housing costs, is not an appropriate response for this neighborhood, and should not be pursued by the City.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jennifer Bragar".

Jennifer Bragar
President