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Sent: Tuesday, August 09, 2016 3:21 PM
To: Planning and Sustainability Commission <psc@portlandoregon.gov>
Subject: CC2035 Written Testimony for Planning Commission

I'll start with the basic premise our code should reflect our core values. I believe fostering greater diversity and local sourcing are two dominant Portland values.

We need our code to help maintain a balance in our built environment when market forces are unbalanced. This is more important than ever given we are now seeing new levels of institutional investment in our city—investment that is agnostic of place or people, only profit. This investment is not evil or bad, it is simply doing what the market and code is telling it to do. But it does need to be tempered and balanced with our values. Yes we want investment and greater density to achieve our long term planning goals. But these goals need not require the heavy loss of building stock diversity and local ownership.

I do not believe the proposed changes in the Central City 2035 Plan adequately achieve that needed balance. I believe we need a more nuanced and targeted urban design framework. One that recognizes distinct districts and sub-districts should be treated differently by the code. There is a place for tall buildings and there is a place for maintaining scale. We need both.

Diversity of building stock in both size and age is critical to a vibrant place. Maintaining the balance of smaller, older structures is not about preventing change. It's not about preservation. It is about diversity because the type and age of the building directly impacts what and who can exist there. We are seeing locally owned buildings being replaced with institutional owners who want top market rents. This will reduce diversity of uses. I've watched this happen to my neighborhood -the Pearl—and now I'm afraid it will begin to happen on the Central Eastside given the out of scale developments in progress and planned.

I would ask the Commission carefully examine the following to better achieve this balance:

- 1) Reduced base height and FAR in areas where there is a context of small grain parcels. (for instance the original South Pearl and the Central Eastside). If we are to increase heights we must create a meaningful market for the transfer of FAR and height and help the local owners of

smaller older buildings have an economic chance of keeping their building in active use. That market won't happen unless our code requires the use of it to build bigger and taller elsewhere.

2 Require the transfer of those rights to be within the same area/neighborhood. We can't allow arbitrage to dilute the market.

3) In those areas with small granular parcels I strongly suggest the Commission examine the idea of limiting lot size and the aggregation of several lots to change the scale of the existing context. This could be a more successful tool than FAR or height limits in areas where maintaining scale and context is desired.

Parking is the primary barrier to keeping new development viable on smaller parcels. Let's walk the walk and not let the storage of cars determine the scale and character of our central city. The very document we are discussing has a key goal by 2035 where at least 80% of commute trips to and from the district are by non-single occupancy vehicle. Higher goals are set for downtown and the Pearl. Limiting lot size could help us get there! This strategy would work well with the development of CLT framed buildings to create a more sustainable and local economic benefit.

Respectfully,

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