



URBAN DEVELOPMENT PARTNERS

August 9, 2016

Planning and Sustainability Commission
c/o Bureau of Planning and Sustainability
1900 SW 4th Ave
Portland, Oregon 97201-5380

RE: Central City 2035 Plan

Urban Development + Partners and staff are inner-east Portland residents, commercial property owners, and commercial developers. Our principals and staff serve on the Central Eastside Industrial Council, the Inclusionary Housing Panel of Experts, the Mixed Use Zoning Policy Advisory Committee, and the New Chinatown / Japantown Historic Stakeholder Advisory Committee. We offer the following testimony to the June 20, 2016 BPS recommendation for the Central City 2035 Plan.

1. Height Limits in East Portland Grand Avenue National Historic District and I-84, Tilikum Crossing, and Salmon Springs Viewpoints
 - A. Request: Base heights and height bonuses to remain as per current code allowances along the Grand Avenue Historic Corridor.
 - B. Reasons: The East Portland Grand Avenue National Historic District certainly contains many of the city's valued historical properties. Preserving these properties through a historic designation is valuable to current and future citizens. However, limiting the height of surrounding properties is costly, and is not necessary. Our significant historic properties stand on their own and are not detracted from by nearby development. In fact, addition of transit and infrastructure, funded by newly constructed, more dense development, will improve access to these historic resources.
2. I-84, Tilikum Crossing and Salmon Springs Scenic View Corridors
 - A. Request: Remove proposed I-84, Tilikum Crossing, and Salmon Springs view corridors from proposal.
 - B. Reasons: Portland's citizens have invested significant public funds in the development of transportation and other smart-growth infrastructure in anticipation of additional housing and jobs located in the Central Eastside. Our community is currently struggling to produce adequate affordable housing for our current and future residents. The reduction of future development capacity in the Central Eastside is not only counter to affordable housing and smart-growth initiatives, but comes at a substantial cost in the form of foregone property taxes, lost transit ridership, and foregone system development charges. Because, with the proposed

view corridors, properties will likely be developed at lower density and not replaced for centuries, these foregone revenues are long standing. This total cost should be taken into consideration when analyzing the value of a view of Mt Hood, that is obscured by cloud cover for much of the year.

3. Low Carbon Buildings

- A. Request: Remove the proscriptive mandate that buildings over 50,000 square feet require a LEED Gold Standard. Replace it with a voluntary measure with incentives.
- B. Reasons: The LEED Gold Standard is one among many possible sustainability standards. Rather than require developers of market-rate and affordable housing incur the additional cost of LEED certification, which will increase the cost of housing, they should be incentivized to voluntarily seek certification through FAR bonuses or other incentives. If a mandatory sustainability standard is put in place, allow for competing certifications, to help control cost, or incorporate desired energy standards into the building code.

We support the vast majority of initiatives and policies provided in the 2035 plan and have only responded to the specific polices outlined above. We appreciate your consideration of this testimony.

Regards,



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