



March 4, 2020

Mayor Wheeler
 Commissioner Eudaly
 Commissioner Fritz
 Commissioner Hardesty

Ref: Proposed amendment to Residential Infill Project re development on curbless streets

Dear Mayor and Commissioners:

The Brentwood-Darlington Neighborhood Association strongly opposes a proposed amendment to the Residential Infill Project that would allow three or more units only on lots having frontage on improved streets.

Our large neighborhood is home to a population widely diverse in ethnicity and income. It has provided a "landing place" for residents displaced by rising costs elsewhere in the city; however, that benefit to Portland (i.e., keeping vital work force members in the city) is diminishing as land values rise in response to demand for housing.

Why do we have this demand? The Federal Home Loan Mortgage Corporation (Freddie Mac) has just reported that America's housing market is undersupplied by 3.3 million units. The shortage is getting worse every year . . . and according to Freddie Mac, Oregon is the most under-supplied state in the nation.

We very much feel Oregon's housing shortage here in Brentwood-Darlington. The rate of parcel splitting for the purpose of building new single-unit housing is amazing . . . but still it produces additional housing slowly and gives rise to a good deal of what we do not need: overly large, expensive homes. We need more housing quickly, particularly middle housing; however, since Brentwood-Darlington is desperately short of curbed streets, we would have no hope of meeting our housing needs if construction were restricted as proposed.

We join the Cully Association of Neighbors, Habitat for Humanity/Metro East, Verde, NAYA, and Oregon Walks in requesting that multi-unit developments fronting on unimproved streets be accorded the same privilege that single-family and duplex developments enjoy: that of paying a Local Transportation Improvement Charge (LTIC) rather than bearing the full cost of infrastructure improvements. If LTIC yields are too low, increase the LTIC instead of forbidding needed housing construction.

Thank you for considering our request.

Sincerely,

Chelsea Powers
 Chair, Brentwood-Darlington
 Neighborhood Association (BDNA)

Stephenie Frederick
 Chair, Land Use & Transportation Committee
 BDNA

Stephenie Frederick

#103481 | March 4, 2020

Testimony to **Portland City Council** on the **Residential Infill Project, Recommended Draft**

PLEASE SEE ATTACHED FILE FOR FORMATTED FORMAL LETTER ON LETTERHEAD:
L-Council RIP Amendment 3-20.pdf March 4, 2020 Mayor Wheeler Commissioner Eudaly
Commissioner Fritz Commissioner Hardesty Ref: Proposed amendment to Residential Infill Project
re development on curbsless streets Dear Mayor and Commissioners: The Brentwood-Darlington
Neighborhood Association strongly opposes a proposed amendment to the Residential Infill Project
that would allow three or more units only on lots having frontage on improved streets. Our large
neighborhood is home to a population widely diverse in ethnicity and income. It has provided a
“landing place” for residents displaced by rising costs elsewhere in the city; however, that benefit to
Portland (i.e., keeping vital work force members in the city) is diminishing as land values rise in
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improvements. If LTIC yields are too low, increase the LTIC instead of forbidding needed housing
construction. Thank you for considering our request. Sincerely, Chelsea Powers Stephenie Frederick
Chair, Brentwood-Darlington Chair, Land Use & Transportation Committee Neighborhood
Association (BDNA) BDNA

Testimony is presented without formatting.



Northwest District Association

TO: Commissioners Eudaly, Fritz, Hardesty and Mayor Wheeler

SUBJECT: Testimony on the Residential Infill Project (City Council Hearing March 12, 2020)

DATE: March 2, 2020

The Northwest District Association supports provisions of the Residential Infill Project that provide incentives to retain existing houses and improve compatible building design in single-dwelling zones. However, we are concerned that some of the proposed amendments will have adverse consequences, and therefore, advocate the following positions:

- #6: oppose a major departure from stated purpose and parameters
- #7: strongly support a historic resource demolition disincentive.

Oppose Amendment 6: *Disallow the “deeper affordability” bonus for buildings up to 6 units*

We oppose this amendment because it goes far beyond the “middle housing” types specified in House Bill 2001, and beyond the stated purpose and parameters of the Residential Infill Project to allow what are essentially small apartment buildings in single-dwelling zones.

“Additional housing options, when **built at a scale and form compatible with single-dwelling neighborhoods**, are considered the “middle” housing spectrum. Duplexes, triplexes and fourplexes along with ADUs comprise the part of the spectrum that the Residential Infill Project aims to expand. These new units will be **built at a size that complements older, existing homes** that have defined Portland neighborhoods for decades.” (*Recommended Draft*, page 5)

Allowing 5- or 6-unit buildings containing 6,000 square feet with a height of 35 feet is not “a scale that is compatible with existing single houses” (page 13).

In fact, a multi-dwelling zone already exists that allows 4- to 6-unit buildings containing 6,000 square feet with a height of 35 feet; it is the new RM1 zone:

“...a low-scale zone that provides a transition to single-dwelling residential areas, often located at the edges of centers or along neighborhood corridors, or other areas intended to provide continuity with the scale of established residential areas.” (*Better Housing by Design Amended Staff Report*, page 18)

Within the Northwest District, this RM1 zone exists adjacent to the RM2 medium-scale zone as well as R5 and R7 single-dwelling zones. This conflation of single-dwelling and small multi-dwelling zones is not consistent with the *Northwest District Plan*, adopted by City Council in 2003 (page C-19):

“Throughout the western residential areas, front and sideyard setbacks tend to be larger than elsewhere in the Northwest District...This provides western residential areas with a greener, more distinctly residential character than the more intensely developed mixed-use areas to the east.”

“Western Residential Areas & the Heights: Desired Characteristics and Traditions—These areas’ rich architectural heritage of late nineteenth- and early twentieth-century houses should be preserved. **New development should continue the existing pattern and scale of development** and incorporate landscaping that contributes to these areas’ distinctly residential character.”

If including “deeper affordability” units is a high priority, instead of allowing small apartment buildings in single-dwelling zones to achieve this, the affordability threshold for a bonus increase in FAR for one unit of a triplex or fourplex should be changed from 80 percent of median family income to 60 percent.

Support Amendment 7: *Prohibit more than 2 dwelling units on sites where a historic resource has been demolished*

We strongly support extending to single-dwelling zones the same disincentive to sites having historic buildings that was adopted for multi-dwelling zones in Better Housing by Design. Since Historic and Conservation Districts are usually built out, infill typically entails demolition. Demolishing historic buildings should not be encouraged by new allowances for “middle housing” types beyond duplexes.

It should be noted that this amendment discourages demolition on only a subset of sites with historic resources in single-dwelling zones. Apart from landmarks listed in the National Register of Historic Places, this amendment applies only to designated contributing buildings within Historic and Conservation Districts. In the Northwest District’s single-dwelling zones, there are 19 registered landmarks, but no Historic or Conservation Districts. Thus, 80 houses in the Northwest District designated as ranked resources in the Historic Resource Inventory that would be contributing resources if located within a Historic or Conservation District will not be affected by this amendment.

In closing, we would like to express our concern that the hasty approval of changes to zoning that had reflected careful planning may permanently damage the livability and beauty of the residential neighborhoods for which Portland is renowned, including some in the Northwest District. We respectfully request your serious consideration of our positions above in this regard.

Sincerely,



Greg Theisen
Chairman, Planning Committee, Northwest District Association

Greg Theisen

#103512 | March 5, 2020

Testimony to **Portland City Council** on the **Residential Infill Project, Recommended Draft**

Letter Attached

Testimony is presented without formatting.



Northwest District Association

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Sincerely,



Greg Theisen
Chairman, Planning Committee, Northwest District Association

Jozell Johnson

#103517 | March 5, 2020

Testimony to **Portland City Council** on the **Residential Infill Project, Recommended Draft**

Letter from NWDA Planning Committee attached.

Testimony is presented without formatting.

Terry Rathkey

#103519 | March 5, 2020

Testimony to **Portland City Council** on the **Residential Infill Project, Recommended Draft**

I believe the redefining of the zoning of 87,324 single family zoned properties to allow for multiple units in the Residential Infill Project (RIP) is not needed and has not been justified. As Metro and city planners stated in last year legislative hearings on SB 10 in Salem, zoned capacity is not Greater Portland's challenge. The Metro UGB has zoned capacity for approximately 1.3 million total homes; far more than are likely to be built in coming decades. My primary concern is that the current RIP does not have an adequate facilities plan to accommodate the increased capacity RIP will create as required by Oregon's Land Use Goals. Allowing 4,6,or 8 unit structures without regard to neighborhood character and capacities under the RIP would cause create ongoing chaos and uncertainty for Portland neighborhoods and does little to affordable housing units, or prevent displacement, and gentrification. By simply allowing duplexes on all residential lots the 2035 Comprehensive Plan would comply with requirements of HB 2001. Perhaps the best way to create more affordable housing would be to re-zone some of the single family zoned property around centers and corridors to Multifamily. This would allow wood framed apartment or condominium complex's to be built where there is adequate transit and infrastructure. Building 20 or 30 units in one project would have significant cost savings over random and scattered building projects with 4, 6, or 8 units. This would develop affordable and sustainable housing units, maintain neighborhood identities and minimize displacement, and gentrification in our city.

Testimony is presented without formatting.

Doug Rathkey

#103520 | March 5, 2020

Testimony to **Portland City Council** on the **Residential Infill Project, Recommended Draft**

I believe the redefining of the zoning of 87,324 single family zoned properties to allow for multiple units in the Residential Infill Project (RIP) is not needed and has not been justified. The 2035 Comprehensive Plan at the time of adoption is required by ORS 197.296 to have a 20 year housing supply of all housing types in order for it to be acknowledged by the state. As Metro and city planners stated in last year legislative hearings on SB 10 in Salem, zoned capacity is not Greater Portland's challenge. The Metro UGB has zoned capacity for approximately 1.3 million total homes; far more than are likely to be built in coming decades. RIP does not have an adequate facilities plan to accommodate the increase capacity RIP will create as required by Oregon's Land Use Goals. Allowing 4,6,or 8 unit structures without regard to neighborhood character and capacities under the RIP creates extreme and ongoing chaos and uncertainty for Portland neighborhoods and does little to provide affordable housing units, or prevent displacement, and gentrification. By simply allowing duplexes on all residential lots the 2035 Comprehensive Plan would comply with requirements of HB 2001. In my opinion, the best way to create more affordable housing would be to re-zone some of the single family zoned property around centers and corridors to Multifamily. This would allow wood framed apartment or condominium complex's to be built where there is adequate transit and infrastructure. Building 20 or 30 units in one project would have significant cost savings over random building projects with 4, 6, or 8 units. This would develop affordable housing units, maintain neighborhood identities and minimize displacement, and gentrification in our unique and beautiful city.

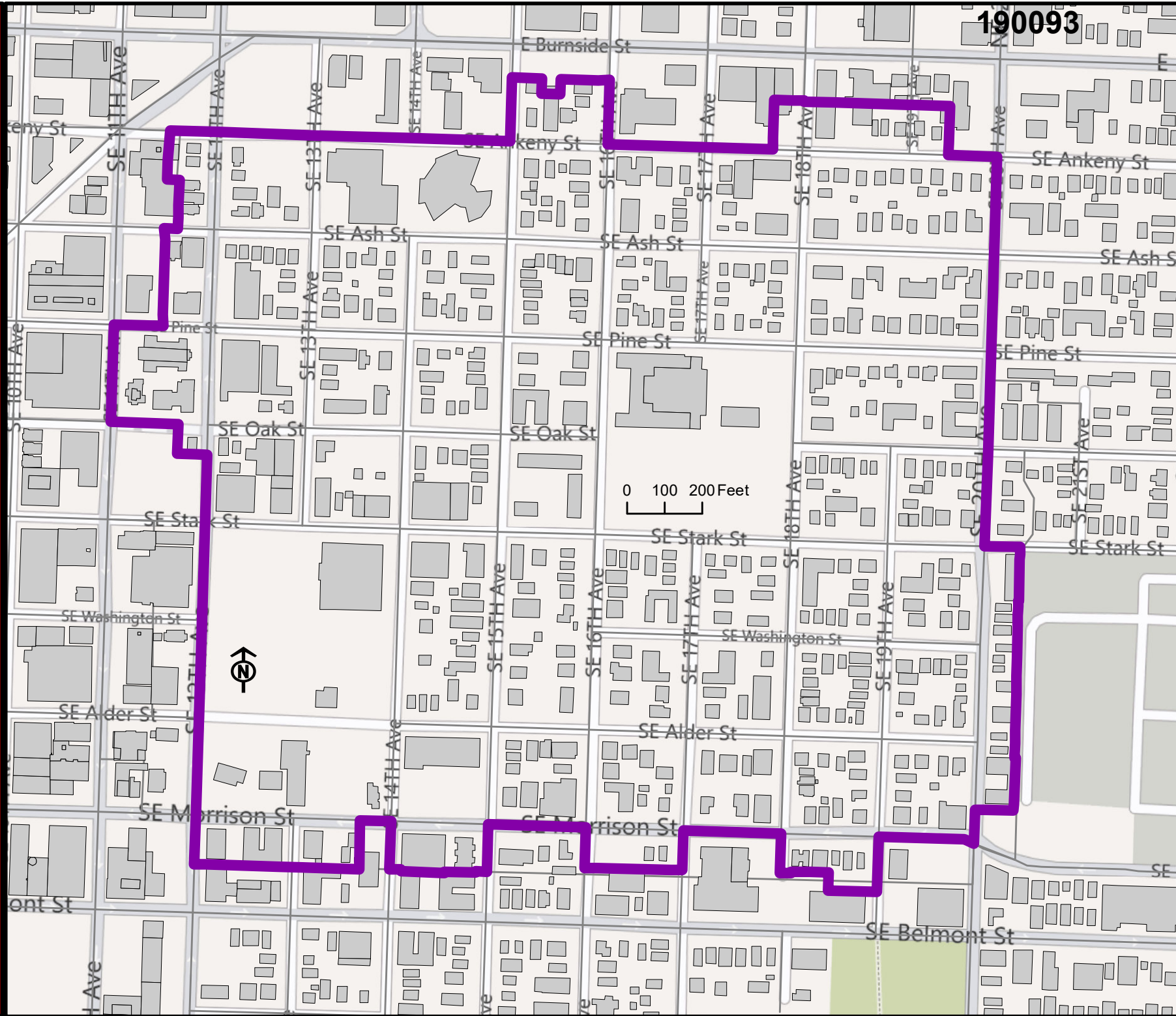
Testimony is presented without formatting.

Legend

- Boundary
- Building Footprint

**North Central Buckman
National Register Historic District
Proposed Boundary
August 2011**

190093





Christine Yun

#103482 | March 6, 2020

Testimony to **Portland City Council** on the **Residential Infill Project, Recommended Draft**

I oppose application of the density increases proposed in RIP to the area of the Buckman neighborhood between SE Morrison and SE Ankeny and SE 20th and SE 12th. This area was eligible to be nominated as a National Register Historic District in 2013, and the neighborhood voted against the district, confident that zoning in this area would not change. Please see the attached map. An increase in allowed density here will accelerate the demolition of historic buildings, and the construction of non-contextual buildings. See the construction at the NE corner of SE 19th and Stark.

Testimony is presented without formatting.

Andrew Goodell

#103483 | March 6, 2020

Testimony to **Portland City Council** on the **Residential Infill Project, Recommended Draft**

I support the RIP, and I support the position of Portland: Neighbors Welcome w.r.t. the amendments. Especially Amendment 6 the "deep affordability bonus", really great idea to make affordable housing and nonprofit developers more competitive and effective, and I also just generally support the idea of mixed-income housing.

Testimony is presented without formatting.

Cherie Weintraub

#103484 | March 7, 2020

Testimony to **Portland City Council** on the **Residential Infill Project, Recommended Draft**

I oppose RIP. Portland has a housing crisis to address and RIP does not address affordable housing at all and will exacerbate the problem. Housing is needed for low and middle income citizens. RIP is a land grab and giveaway to developers and speculators. It destroys neighborhood integrity and liveability and replaces reasonable homes with outsized cheaply-built many-staired structures. It encourages ADUs that are frequently used for Air B&B type income, which also does nothing to address the housing crisis. It is not infill but demolition. Since promoters of the plan admit that it does not address the affordable housing crisis, it's hard to fathom why this plan is being advanced at all. In addition, it does not address Portland's inadequate public transportation or realistically deal with parking issues.

Testimony is presented without formatting.

Dyann Dukelow

#103485 | March 7, 2020

Testimony to **Portland City Council** on the **Residential Infill Project, Recommended Draft**

I oppose R. I.P. I own a single family home on a corner and take care of my 91 year old mother. I am 65. In a few years I will need a single story home. ALL of the apartments that are being infilled are ridiculously expensive for a two bedroom apartment. And few are actually condos where younger people can get into the market. It is awful that the kids that grew up in my neighborhood cannot afford to live here, near their parents. They will have children that will need grandparent care and their parents will need care eventually as well. These infill projects are not allowing family units to be close. And worst of all, there is no housing for the poor and needy who are shoved to the street with addicts. There is little affordable housing for senior citizens either. You are selling Portland to developers just as San Francisco did, and will force out all the middle class. I don't mind infill if it is affordable, for the working class, poor, old and disabled. This project is a disaster. Don't let it pass.

Dianne Dukelow

Testimony is presented without formatting.

Diane Luck

#103486 | March 8, 2020

Testimony to **Portland City Council** on the **Residential Infill Project, Recommended Draft**

I strongly oppose RIP. We do not have the infrastructure to support such density and the character of Portland will be ruined.

Testimony is presented without formatting.

Keith Comess

#103487 | March 8, 2020

Testimony to **Portland City Council** on the **Residential Infill Project, Recommended Draft**

I am writing in OPPOSITION to the Residential Infill Project (RIP). In addition to numerous cogent, fact-based, compelling arguments already made against the RIP by many thoughtful observers and expert analysts, the recent economic downturn is likely to be of long duration, a conclusion based on epidemiologic as well as economic considerations. Speculative construction - built on the hopes/expectations that builders/developers/financiers/real estate investment trusts - will continue funding of "affordable" units is likely to be disappointed: profit considerations are always paramount and are especially acute in times of economic turmoil. In short, the efforts to "solve" a housing crisis using the vehicle of the RIP - ill advised initially and now likely to fail - should be directed instead to funding sustainable jobs at living wages for "at risk" and "missing middle income" residents. That can be accomplished by taxation and other incentives and will likely yield a greater return than "building our way out of a problem".

Testimony is presented without formatting.

Frances DeRook

#103488 | March 8, 2020

Testimony to **Portland City Council** on the **Residential Infill Project, Recommended Draft**

I am writing in OPPOSITION to the Residential Infill Project (RIP). In addition to numerous cogent, fact-based, compelling arguments already made against the RIP by many thoughtful observers and expert analysts, the recent economic downturn is likely to be of long duration, a conclusion based on epidemiologic as well as economic considerations. Speculative construction - built on the hopes/expectations that builders/developers/financiers/real estate investment trusts - will continue funding of "affordable" units is likely to be disappointed: profit considerations are always paramount and are especially acute in times of economic turmoil. In short, the efforts to "solve" a housing crisis using the vehicle of the RIP - ill advised initially and now likely to fail - should be directed instead to funding sustainable jobs at living wages for "at risk" and "missing middle income" residents. That can be accomplished by taxation and other incentives and will likely yield a greater return than "building our way out of a problem".

Testimony is presented without formatting.

MICHAEL BEAMAN

#103489 | March 8, 2020

Testimony to **Portland City Council** on the **Residential Infill Project, Recommended Draft**

Beaman Architecture Ltd. and I oppose RIP as the negative impacts on residential zones will far outweigh the positive outcomes. I am appalled by these regulations and the allowance of a duplex on my property (with an ADU), especially when the rents will not be affordable and with no off-street parking required. This RIP helps only those who stand to make money on this kind of unfettered development: developers, builders, the politicians who take campaign contributions from these kinds, the industry associations, and finally the City, which stands to make a lot more in property taxes. Yes, more urban density may be necessary but not at the expense of current residents or future residents who work in Portland but can't afford to live within the city limits. We have owned a house and lived in Portland for 35 years and originally chose the Hawthorne district because of the residential neighborhood. Now the City wants to make it so I can possibly have duplexes on either side and the same across the street? The place for density is not in existing residential neighborhoods but along arterials and other areas where true densities can be realized more easily.

Testimony is presented without formatting.

James Barta

#103490 | March 8, 2020

Testimony to **Portland City Council** on the **Residential Infill Project, Recommended Draft**

Mayor & City Council- I want to testify in opposition to the proposed Residential Infill Program (RIP) for the following reasons. -- RIP will lead to demolition of existing viable, affordable housing --RIP will cause displacement of existing renters. It does not address this issue --RIP will no increase housing affordability on Portland. Studies show the opposite . --City recently passed Better Housing By Design (BHD) that allows increased Middle Housing. We should allow BHD to take effect and work for a few years before considering RIP

Testimony is presented without formatting.

Olivier Jullian

#103491 | March 8, 2020

Testimony to **Portland City Council** on the **Residential Infill Project, Recommended Draft**

I oppose the RIP project. It doesn't offer solution to the housing crisis. the new condos/Houses built under the new zone rules won't be affordable and will result in the decrease of property values all around.

Testimony is presented without formatting.



Portland City Council
1221 SW 4th Avenue
Portland, OR 97204

March 8, 2020

Mayor Wheeler and members of Portland City Council:

Portland: Neighbors Welcome is a grassroots pro-housing, pro-tenant organization. We are proud to testify as advocates for a holistic suite of policies that will address the housing crisis from multiple angles.

After nearly 5 years of work, the Residential Infill Project, including amendments 1 through 4 and amendment 6, is poised to create the incremental but important change Portland needs in order to welcome people into more abundant and less expensive homes in all of our neighborhoods.

Portland: Neighbors Welcome supports amendments 1 through 4 and amendment 6. We strongly oppose amendment 5 and amendments 7 through 17.

Amendment 6: Deeper Affordability Bonus

Portland: Neighbors Welcome enthusiastically supports the deeper affordability bonus amendment and urges its passage. The idea to add a Deeper Affordability bonus was brought forward by Habitat for Humanity, ROSE CDC, Proud Ground, Portland Community Reinvestment Initiatives, Catholic Charities, and Portland: Neighbors Welcome to reduce the amount of subsidy needed per home to create new rental and homeownership opportunities for lower-income Portlanders. While less ambitious than our initial proposal, this amendment is a strong step in the right direction and we support it wholeheartedly.

Under current zoning, affordable housing developers have been effectively locked out of most low-density residential neighborhoods. This amendment changes that reality by providing local affordable housing developers an exciting new tool to create housing for their constituents. It would:

- Legalize the creation of up to 6 homes per lot if at least half are affordable to rent at 60% area median income or to buy at 80% area median income.

- Allow a floor area ratio of 1.2 for development in which at least half of the homes are affordable.

In addition, this amendment:

- Facilitates the creation of housing for the many folks who do not qualify for Section 8 vouchers but also cannot afford typical market-rate housing.
- Allows for up to 6 much-needed family-sized affordable homes of 850 to 1,000 square feet on a typical Portland lot.
- Proposes a floor area ratio that is significantly lower than that currently allowed in low-density residential zones.

We encourage city staff to monitor the impacts of this amendment going forward to ensure that the proposed development standards allow enough affordable homes to be created, and adjust the standards if necessary.

Amendment 5: Infrastructure

We applaud Council's decision to eliminate this amendment. This amendment:

- Would have removed the ability to build smaller, less expensive homes—and regulated affordable 5- and 6-unit homes—in some of the very neighborhoods that are most vulnerable to displacement as well as in most of Southwest Portland, continuing a legacy of exclusionary zoning in an area of the city that has largely resisted less-expensive housing.
- Would have done nothing to encourage new sidewalks.
- Was opposed by Verde, NAYA, Hacienda CDC, Oregon Walks, Safe Routes Partnership, the Cully Neighborhood Association, and affordable housing providers.

We urge the city to continue working toward a long-term solution for sidewalk infill and shared-street designs. All in-lieu fees and other costs should be assessed by the lot rather than by the unit. We do not oppose higher LTIC fees in some or all parts of Portland, as long as they don't end up disproportionately incentivizing the most infrastructure-inefficient housing types: one- and two-unit structures.

Amendment 7: Conservation Districts

Portland: Neighbors Welcome opposes this amendment, which would ban triplexes and fourplexes—and regulated affordable 5- and 6-unit homes—from certain affluent neighborhoods, while doing nothing to incentivize adaptive reuse of historic resources through internal conversions. This amendment would affect about 1,700 lots. In addition, the proposed demolition review for smallplexes with 3 to 6 units is prohibitively and disproportionately expensive, which means these smaller, less expensive homes would not be built in these neighborhoods.

Amendments 8-17: Tabled Amendments

Portland: Neighbors Welcome opposes these amendments. In sum, these amendments would delay the adoption of the Residential Infill Project, make it less impactful, or run afoul of state law. Specifically, these amendments would have:

- Blocked new smallplexes with more than 2 units in large areas of the city.
- Created difficult or unworkable standards that would reduce new middle-housing creation.
- Excluded wealthy neighborhoods from the Residential Infill Project changes.

These amendments are unreasonable and unworkable, and they undermine the fundamental purpose of the Residential Infill Project. Council was right to table them in February, and they should remain tabled.

Amendments 1-4: Technical Amendments

Finally, Portland: Neighbors Welcome supports these amendments to ensure the code functions well, bring the proposal into compliance with HB 2001 and SB 534, and streamline property line procedures.

Thank you for the opportunity to testify on the proposed Residential Infill Project amendments.

Portland: Neighbors Welcome appreciates the attention of policymakers, staff, and Portlanders across the city to this important project. With the passage of amendments 1 through 4 and amendment 6, and this project as a whole, we are excited to enter a new era—one that denounces the racist pattern of exclusionary zoning that has shaped our city for decades and opens up our neighborhoods to more Portlanders with abundant and less expensive housing options.

With this, we remind you that as important as the completion of this project is, it is not adequate to meet the housing needs of all Portlanders in the future, nor is it a solution to the immediate crises many Portlanders face today. More action is needed: a citywide anti-displacement strategy, new funding to fight homelessness and build deeply affordable homes, and zoning reforms to bring larger mixed-income buildings to currently exclusive areas near transit and jobs. We look forward to working together on these fronts.

Sincerely,

Handwritten signatures of Love Jonson and Eric Lindsay. The signature on the left is 'Love Jonson' and the signature on the right is 'Eric Lindsay'.

Love Jonson and Eric Lindsay

On behalf of the Portland: Neighbors Welcome Policy & Partnerships Committee

Love Jonson

#103492 | March 8, 2020

Testimony to **Portland City Council** on the **Residential Infill Project, Recommended Draft**

Please see the attached testimony from Portland: Neighbors Welcome on the Residential Infill Project amendments.

Testimony is presented without formatting.

Kol Peterson

#103493 | March 8, 2020

Testimony to **Portland City Council** on the **Residential Infill Project, Recommended Draft**

Please pass RIP without further delay. 4 years of discourse is enough. Climate change is happening. Poverty is happening. In alignment with Portland: Neighbors Welcome, I support amendments 1 through 4 and amendment 6. I oppose amendment 5 and amendments 7 through 17, which will cause RIP to be significantly delayed further. Please stop delaying and pass this bill.

Testimony is presented without formatting.

Mark Uhrich

#103494 | March 9, 2020

Testimony to **Portland City Council** on the **Residential Infill Project, Recommended Draft**

We are against this current round of infill. Enough is enough, there already many empty new housing units. Stop ruining our neighborhoods and residential areas, especially with infill units with little, inadequate or no parking.

Testimony is presented without formatting.

Christy Uhrich

#103495 | March 9, 2020

Testimony to **Portland City Council** on the **Residential Infill Project, Recommended Draft**

We are against these amendments to the infill program as the proposals are taking us further away from what was originally proposed. Please just stop adding to the height and overall extent of these developments and stick to the original plan. You are ruining our neighborhoods. Amendment #6 would also grant an additional height bonus of 5 feet in the R5 and R7 zones which means buildings could be 35 feet tall. Data from the City of Portland shows the median Portland house is 1500 square feet and 15 feet tall (to the midpoint of the roof pitch). The multi-dwelling structures allowed under Amendment #6 would be grossly out of scale in almost all Portland neighborhoods. One of the goals of the original Residential Infill Project was to modify building codes so the scale of new construction would fit in better with existing homes in a neighborhood. In the five years since this project began, each iteration of RIP has become more removed from achieving this goal. Amendment #6 takes us ever further from the goal of changing city code to create compatible infill. Furthermore there is nothing in RIP or in Amendment #6 that would require or even encourage the higher density units to be located near frequent transit.

Testimony is presented without formatting.

Mark Uhrich

#103496 | March 9, 2020

Testimony to **Portland City Council** on the **Residential Infill Project, Recommended Draft**

Are residential areas within 2 blocks or adjacent to Grant Park should be changed from R5 to R2.5, Portland should not allow such huge structures next to a wooded natural setting. BPS should at least change this designation. And please keep to the original RIP and stop increasing Floor Area Ratio and building heights. If BPS is going to destroy neighborhoods at least do it with buildings that match the existing homes.

Testimony is presented without formatting.

I OPPOSE the Residential Infill Project (RIP). RIP will replace lower-priced housing with high-priced housing, displace lower-income Portlanders, and worsen our shortage of affordable housing.

Large areas of NE Portland, including King, Humboldt, and Boise, are already zoned for multi-unit housing (R2.5, RM1, RM2, etc.). For example, much of King is zoned R2.5, which allows two units and two ADUs on a 5,000 square foot lot.

For several years, developers have been demolishing relatively affording houses in these areas and replacing them with expensive duplexes, triplexes, and fourplexes.

Below are several current real estate listings that clearly demonstrate how replacing single-family homes with multi-unit housing is accelerating gentrification in these neighborhoods. It wasn't difficult to find these examples -- there are many, many more.

In all the examples, a person would need to make more than \$100,000 year (and sometimes much more) to afford the mortgage or rent on one of these new units.

I can support RIP only if it includes amendments to retain existing housing and provide strong disincentives to demolish viable homes.

Example 1: Triplex at 4493-4485-4479 NE Rodney Avenue

Neighborhood: Humboldt

Current zoning: R2.5

What happened: A single-family home (last sold for \$210,000) was demolished and replaced by a triplex.

Two of the units in the triplex are currently listed as rentals for **\$2,795/month rent** each:

- https://www.zillow.com/homedetails/4493-NE-Rodney-Ave-A-Portland-OR-97211/121950756_zpid/
- <https://www.zillow.com/b/4485-ne-rodney-ave-portland-or-BLVBgM/>

Before and after:



Example 2: Duplex at 803-807 NE Jessup Street

Neighborhood: King

Current zoning: RM1

What happened: A single-family home (last sold for \$330,000) was demolished and replaced by a duplex. Each unit in the duplex has a built-in ADU with a separate entry.

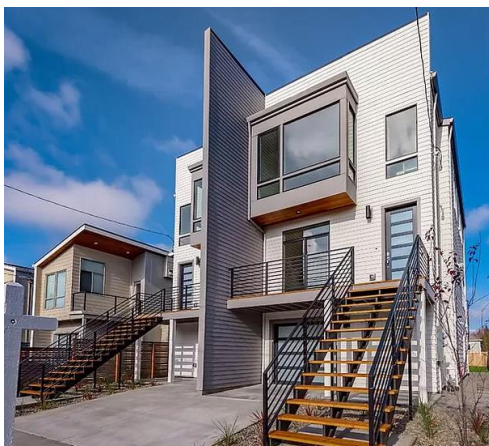
One unit in this duplex sold for **\$735,000**:

https://www.zillow.com/homedetails/803-NE-Jessup-St-Portland-OR-97211/2087055387_zpid/

The 608 square foot ADU in this duplex is currently listed as a rental for **\$1,600 a month rent**:

https://www.zillow.com/homedetails/803-NE-Jessup-St-1-Portland-OR-97211/2081356386_zpid/

Before and after:



Example 3: Duplex at 760-762 NE Jessup Street

Neighborhood: King

Current zoning: RM1

What happened: A single-family home (last sold for \$215,000) was demolished and replaced by a duplex. Each side of the duplex has a built-in ADU with a separate entrance.

One unit in this duplex is currently for sale for **\$624,900**:

https://www.zillow.com/homedetails/760-NE-Jessup-St-Portland-OR-97211/53842787_zpid/

Before and after:



Example 4: Sixplex at 3563 N Gantenbein Avenue

Neighborhood: Boise

Current zoning: RM2

What happened: A single-family home (on a 10,000 square foot lot) was demolished and replaced by two sixplexes. The units that have sold so far were priced between **\$344,900 and \$369,900**. HOA dues are an additional \$269/month. Unit #101 is currently listed for sale at **\$344,900**:

<https://www.estate.com/listings/info/3563-n-gantenbein-ave-101>

Unit #302 is currently listed as a rental for **\$2,395 a month rent**:

https://www.apartments.com/3563-n-gantenbein-ave-portland-or-unit-302/ys6lj9v/?fbclid=IwAR01_aPenVqTGK77oed1QhQPj6SX9MHaJxDbhd4Utlgh0hsbiOiERIdAfgU

Unit #301 is currently listed as a rental for **\$2,495 a month rent**:

https://www.zillow.com/homedetails/3563-N-Gantenbein-Ave-301-Portland-OR-97227/2081549331_zpid/

Before and after:



Jacquie Walton

#103497 | March 9, 2020

Testimony to **Portland City Council** on the **Residential Infill Project, Recommended Draft**

I OPPOSE the Residential Infill Project (RIP). RIP will replace lower-priced housing with high-priced housing, displace lower-income Portlanders, and worsen our shortage of affordable housing. Large areas of NE Portland, including King, Humboldt, and Boise, are already zoned for multi-unit housing (R2.5, RM1, RM2, etc.). For example, much of King is zoned R2.5, which allows two units and two ADUs on a 5,000 square foot lot. For several years, developers have been demolishing relatively affording houses in these areas and replacing them with expensive duplexes, triplexes, and fourplexes. The attached PDF describes several current real estate listings that clearly demonstrate how replacing single-family homes with multi-unit housing is accelerating gentrification in these neighborhoods. It wasn't difficult to find these examples -- there are many, many more. In all the examples, a person would need to make more than \$100,000 year (and sometimes much more) to afford the mortgage or rent on one of these new units. I can support RIP only if it includes amendments to retain existing housing and provide strong disincentives to demolish viable homes.

Testimony is presented without formatting.

Leon Porter

#103498 | March 9, 2020

Testimony to **Portland City Council** on the **Residential Infill Project, Recommended Draft**

Dear Mayor and Commissioners, I support the Residential Infill Project and Amendment Packages 1, 2, 3, 4, and 6. But I strongly oppose Amendment Package 7. Its stated purpose is historic preservation, but it would mainly preserve only the historic exclusion of diversity from Portland's wealthy single-family neighborhoods. Contrary to the staff explanation, Amendment Package 7 would do nothing to encourage internal conversions or adaptive re-use of historic resources. The problem is that the Oregon Structural Specialty Code and local permitting requirements make internal conversions of existing homes into smallplexes extremely difficult and expensive--generally more so than building a new structure. Furthermore, Portland's city code largely obstructs adaptive re-use of large single-family homes for group living. And far too many old houses and entire neighborhoods are being sweepingly designated as "historic resources" without critical scrutiny of those designations' social costs and benefits, solely in order to block new residential development. Until all these exclusionary barriers have been overcome, Amendment Package 7 will ensure only that large under-occupied single-family homes remain under-occupied, and that people of lower incomes remain shut out of the wealthier single-family neighborhoods with disproportionately many large old homes. So please eliminate this misguided Amendment Package 7 before you pass the Residential Infill Project and the other Amendment Packages. Best wishes, Leon Porter

Testimony is presented without formatting.

Neil Heller

#103499 | March 9, 2020

Testimony to **Portland City Council** on the **Residential Infill Project, Recommended Draft**

I support the Residential Infill Project and amendments 1-4, which will create more housing at lower prices in many neighborhoods to welcome people to Portland. I strongly support Amendment 6, which enables non-profit housing providers to build truly affordable units in small projects and oppose amendment 7, which would not lead to re-use, but to more expensive homes.

Testimony is presented without formatting.

Alan Kessler

#103500 | March 9, 2020

Testimony to **Portland City Council** on the **Residential Infill Project, Recommended Draft**

Please support the Residential Infill Project ("RIP") as well as amendments 1, 2, 3, 4, and 6. Increased supply as well as strong tenant protections are necessary to achieve a just outcome. This is a modest move toward the first goal, and its displacement effects are extremely limited. Now the work must continue to protect vulnerable tenants and continue to push for affordable housing in our richest neighborhoods. Please reject amendment 7. It is a poison pill which would continue to suppress supply in our toniest neighborhoods.

Testimony is presented without formatting.

Iain MacKenzie

#103501 | March 9, 2020

Testimony to **Portland City Council** on the **Residential Infill Project, Recommended Draft**

Dear City Commissioners—Thank you for all your work to-date on the Residential Infill Project. I'm proud to live in a city where my city council looked at a project like this, and responded "yes, but how do we make it better?". With that spirit, I urge you to vote yes on Amendment #6, the Deeper Affordability Bonus. Adding this provision to our zoning code will let organizations like Habitat for Humanity and Proud Ground provide housing in our low density zones. Please also adopt technical amendments #1-4, and reject amendments #8-17.

Testimony is presented without formatting.

Brighton West

#103502 | March 9, 2020

Testimony to **Portland City Council** on the **Residential Infill Project, Recommended Draft**

I support the RIP project, including amendments 1-7.

Testimony is presented without formatting.

Jonathan Greenwood

#103503 | March 9, 2020

Testimony to **Portland City Council** on the **Residential Infill Project, Recommended Draft**

Hello council and mayor, I am writing to express my support of the residential infill project. However, I would like to state my support and opposition to some amendments proposed. I support the technical amendments 1 through 4 and amendment 6, the crucial “deeper affordability” bonus to allow below-market family-size homes on any lot in the city. I oppose amendment 7. This amendment would ban triplexes, fourplexes, and regulated affordable 5- and 6-plexes in certain affluent neighborhoods. In addition, amendment 7 would do nothing to incentivize internal conversions or the retention of historic buildings. I oppose amendments 8-17. Collectively, these amendments would undermine the project. Unworkable standards would make it impossible to build more than two units in many wealthy neighborhoods, increasing the price of housing. Overall, the amendments I support will go a long way to address the housing crisis our city is facing. Despite this, there is more work to be done. An anti-displacement strategy needs to be enacted to ensure we are not driving people of color and low-income folks out of our neighborhoods. In addition, we need to move forward with new funding to help houseless folks in our communities. I argue a housing first initiative like is in place in Finland would be a broad approach to housing our most vulnerable community members. Finally, I believe we should fight for zoning reforms that will bring dense mixed-income and mixed-use development near jobs and transit. Please pass the residential infill project with the amendments I support, but move forward in the other ways I mention in the future. Thank you Jonathan Greenwood

Testimony is presented without formatting.

Monique Gaskins

#103504 | March 9, 2020

Testimony to **Portland City Council** on the **Residential Infill Project, Recommended Draft**

Hello City Council, I'm asking that you please adopt RIP and amendment 6. I ask that you please oppose amendment 5 and 7. Passing of RIP will be a great first step in addressing our housing crisis in Portland, and I'm looking forward to the next steps the city can take.

Testimony is presented without formatting.

Aaron Brown

#103505 | March 9, 2020

Testimony to **Portland City Council** on the **Residential Infill Project, Recommended Draft**

I am once again submitting testimony in support of the Residential Infill Project. I encourage the city to listen to the recommendation on amendments proposed by local abundant housing advocacy organization Portland: Neighbors Welcome; I support amendments 1-4 and amendment 6, and strongly oppose amendment 5 and 7-17. Amendment 5, in particular, seems extremely backwards, especially in lieu of opposition to the amendment listed by respected and knowledgeable transportation and housing advocates, and I'm grateful to see this amendment scrapped from the city's consideration. Please move forward with this important initiative to relegalize missing middle housing. Portland's overlapping climate and housing crises are depending on action.

Testimony is presented without formatting.

March 9, 2020 Commissioners, good day. I reside in Woodlawn, a neighborhood that has a long history of working with the City to help plan its development. I participated in drafting some of those plans, and also in getting a portion of the neighborhood designated a historic Conservation District. I am also active with our neighborhood Land Use and Transportation committee. It is also a neighborhood with a very long history, as I documented in my book, *Portland's Woodlawn Neighborhood* (by Arcadia Publishing). One thing history has taught me is that a planned improvement often has unintended costs.

A representative of the city planning department met with us twice about the City proposals that would affect our Conservation District.

1. STRONGER DEMOLITION RULES



Today's regulations require a 120-day delay before historic contributing buildings in conservation districts can be demolished. This demolition delay period rarely results in buildings being saved. The proposed changes would require a new type of demolition review before contributing buildings are approved for demolition. This staff-level review would disincentivize demolition and generally require mitigation before a demolition permit is issued. Such mitigation could include rehabilitation, public history, cultural preservation, or affordability dollars that stay in the district.

Photo courtesy Scott Tice.

PROTECTING HISTORIC BUILDINGS



4. PROCESS TO AMEND DISTRICT DETAILS



There is no clear process for changing the contributing (i.e. historic) status of properties in conservation districts. A new procedure would allow for owner-initiated proposals to change the contributing status of their property to reflect on-the-ground reality. Code changes would also allow City Council to revise conservation district boundaries.

The Mississippi Conservation District's boundaries have not been reviewed since its establishment in 1993.

WE WANT A CLEAR PROCESS FOR PROTECTING CONTRIBUTING PROPERTIES

These two items had us most emotionally involved.

At our meetings, we decided that we want a clear process for protecting historic properties and for slowing down and **preventing the demolishing of historic or contributing properties.**

I have spoken to PSU classes in urban planning with the message that just because a house on a city map looks old, and is old, doesn't mean it needs to be cleared away for something new. Our neighbors still mourn the loss of many beautiful, well maintained Queen Ann style homes that were demolished to build our park.

My own home is 107 years old and a contributing building, but not a historic register candidate.

I strongly support the Architectural Heritage Center proposed amendment 7 to create disincentives to demolition.

A strong faction of us in Woodlawn also are concerned about increasing housing accessibility as the population ages. I think the visitability factor should be greatly emphasized.

And the majority of us are concerned about building affordable projects. The RIP as it is now proposed, has removed most of the incentives for affordable construction.

Speaking for myself, I am greatly disgusted that affordable single family dwellings have been replaced by multiple unaffordable single family dwellings. While the intent was to create more dwelling units, and that, indeed happened, few people can live in them.

Concerning new buildings without parking, half of those who attend our neighborhood association meetings want new properties without parking, and the others are vehemently against new properties without parking.

Anjala Ehelebe

#103506 | March 9, 2020

Testimony to **Portland City Council** on the **Residential Infill Project, Recommended Draft**

March 9, 2020 Commissioners, good day. I reside in Woodlawn, a neighborhood that has a long history of working with the City to help plan its development. I participated in drafting some of those plans, and also in getting a portion of the neighborhood designated a historic Conservation District. I am also active with our neighborhood Land Use and Transportation committee. It is also a neighborhood with a very long history, as I documented in my book, *Portland's Woodlawn Neighborhood* (by Arcadia Publishing). One thing history has taught me is that a planned improvement often has unintended costs. A representative of the city planning department met with us twice about the City proposals that would affect our Conservation District. PROTECTING HISTORIC BUILDINGS WE WANT A CLEAR PROCESS FOR PROTECTING CONTRIBUTING PROPERTIES These two items had us most emotionally involved. At our meetings, we decided that we want a clear process for protecting historic properties and for slowing down and preventing the demolishing of historic or contributing properties. I have spoken to PSU classes in urban planning with the message that just because a house on a city map looks old, and is old, doesn't mean it needs to be cleared away for something new. Our neighbors still mourn the loss of many beautiful, well maintained Queen Ann style homes that were demolished to build our park. My own home is 107 years old and a contributing building, but not a historic register candidate. I strongly support the Architectural Heritage Center proposed amendment 7 to create disincentives to demolition. A strong faction of us in Woodlawn also are concerned about increasing housing accessibility as the population ages. I think the visitability factor should be greatly emphasized. And the majority of us are concerned about building affordable projects. The RIP as it is now proposed, has removed most of the incentives for affordable construction. Speaking for myself, I am greatly disgusted that affordable single family dwellings have been replaced by multiple unaffordable single family dwellings. While the intent was to create more dwelling units, and that, indeed happened, few people can live in them. Concerning new buildings without parking, half of those who attend our neighborhood association meetings want new properties without parking, and the others are vehemently against new properties without parking.

Testimony is presented without formatting.



March 3, 2020

TO: Jessica Conner, Portland Housing Bureau, Morgan Tracy, Bureau of Planning and Sustainability

FR: Diane Linn, Proud Ground, Executive Director

RE: RIP Deeper Affordable Housing Bonus

Proud Ground joins Habitat for Humanity Portland Metro East in their enthusiastic support for the Deeper Affordable Housing Bonus Amendment to allow for additional FAR and six-plexes. Proud Ground partners with Habitat to provide first time homeownership opportunities to buyers earning between 35 - 100% AMI, and addition to their achievement of over 90% of the people of color, we also serve households of color. Proud Ground maintains a wait list of over 500 families, three quarters of whom are households of color. Our homeownership models rely on identifying properties zoned appropriately for family-sized units in neighborhoods across the city.

If the Deeper Affordability Bonus is approved, in addition to the units Habitat expects to be able to build on double-sized lots where allowed for family-sized units, Proud Ground hopes to partner with builders to add more units in a more cost effective way also. The 6 - unit projects on infill properties would allow Proud Ground to add to Habitat's pipeline for homes in neighborhoods around the city. The communities that have experienced displacement caused by gentrification have the amenities that families of color should have access to, allowing them to build equity in their homes as white families have in this market. Re-establishing the economic and cultural diversity that was once taken for granted in Portland is a critical goal in this housing crisis. We are hoping to contribute to the numbers of houses Habitat would build through projects annually, with an upward trajectory in the coming years as they have anticipated, adding an additional 6 or more units in the coming years, annually. When a family can move from a rental unit into a home they own, it opens up rental opportunities for others, while at the same time stabilizing the children and anchoring them in community. This improves educational, health and employment outcomes for the families in homes where they are building equity and where future families will benefit from the permanent affordability we promise.

I look forward to continued discussion about the critical need for policy change. Please support this important bonus structure within the Residential Infill Project. Thank you!

Dreams Start Here.

Diane Linn

#103521 | March 9, 2020

Testimony to **Portland City Council** on the **Residential Infill Project, Recommended Draft**

Letter from Proud Ground attached.

Testimony is presented without formatting.

Rose City Park Neighborhood Association RIP Document Review

Conducted February 2020, published 3/4/2020

Participants: Gloria Gardiner & Tamara DeRidder, AICP

We reviewed the public documents available on-line (internet at <https://beta.portland.gov/bps>) regarding, or relevant to, the Residential Infill Project (the Project): the adopted 2035 Comprehensive Plan and supporting documents, the Portland Plan, Citywide Systems Plan, Growth Scenarios report, Housing Affordability report, Housing Demand and Supply Projections report, Updates on Key Housing Supply and Affordability Trends report, Household Demand and Supply Projections report, Buildable Lands Inventory and Growth Allocation GIS model, Revised, April 2016, Code Reconciliation Project amendments to Code Title 33 Housing, Zoning and Comprehensive Plan Map amendments, staff report, Potential Amendment Concepts discussed by the City Council (the Council) in January and February 2020, and new state zoning mandates for urban residential development.

The August 2019 Staff Report and Map Amendments documents include findings of compliance with the Plan's five overarching Guiding Principles (*see Staff Report, page 3*), and housing findings (*see Staff report*). The Staff Report mentions additional policy directions in "Appendix A: Guidance From the Comprehensive Plan." (*Staff Report, p. 3*) The only Appendix A that we found on the Project web site is a "Revised economic analysis on the proposed changes to the single-dwelling zone development standards."

The Plan requires that the proposed Project Code and Map amendments must be evaluated for compliance with ***all*** of the relevant Plan Goals and Policies. Based on our review, we believe that ***none of the Project's proposed amendments have been evaluated according to many of the relevant Plan Goals and Policies.***

RIP Relevant Adopted Plan Goals, Policies, and Supportive Documents

Recommended by: RCPNA Board, RCPNA Chairwoman and Land Use Planner Tamara DeRidder, AICP, and RCPNA Member and retired Land Use Planner Gloria Gardiner.

Date: March 4, 2020

In order to assist staff and the Commission in the remand on the RIP below describes and quotes plan and supporting document text of what we believe are relevant Plan Goals and Policies for this project that have not yet been addressed.

2035 Comprehensive Plan Chapter	Plan Policy	Supporting document	Relevant text
Chapter 1 Plan elements and administration	1.14		Public facility adequacy. Consider impacts on the existing and future availability and capacity of urban public facilities and services when amending Comprehensive Plan elements and implementation tools.
Chapter 8 Public facilities and services Goal 8.A: Quality public facilities and services Goal 8.B: Multiple benefits Goal 8.C: Reliabilit			

y and resilienc y Goal 8.E: Sanitary and stormw ater systems Goal 8.G: Water Goal 8.I: Pubic safety and emerge ncy respons e			
Public investm ent	8.21		System capacity. Establish, improve, and maintain public facilities and services at levels appropriate to support land use patterns, densities, and anticipated residential and employment growth, as physically feasible and as sufficient funds are available.
Public investm ent	8.22		Equitable service. Provide public facilities and services to alleviate service deficiencies and meet level-of-service standards for all Portlanders . . .
Public investm ent	8.23		Asset management. Improve and maintain public facilities systems using asset management principles to optimize preventative maintenance, reduce unplanned reactive maintenance, achieve scheduled delivery, and protect the quality, reliability, and adequacy of City services.
Public investm ent	8.24		Risk management. Maintain and improve Portland's public facilities to minimize or eliminate economic, social, public health and safety, and environmental risks.
Funding	8.27		Cost-effectiveness. Establish, improve, and maintain the public facilities necessary to serve designated land uses in ways that cost-effectively provide desired levels of service, consider facilities' lifecycle costs, and maintain the City's long-term financial sustainability.

Funding	8.28		Shared costs. Ensure the costs of constructing and providing public facilities and services are equitably shared by those who benefit from the provision of those facilities and services.
Funding	8.29		System development. Require private or public entities whose prospective development or redevelopment actions contribute to the need for facility improvements, extensions, or construction to bear a proportional share of the costs.
Service provision and urbanization	8.3		Urban service delivery. Provide the following public facilities and services at urban levels of service to urban lands within the City's boundaries of incorporation: <ul style="list-style-type: none"> • Pubic rights-of-way, streets, and public trails • Sanitary sewers and wastewater treatment • Stormwater management and conveyance • Flood management • Water supply • Police, fire, and emergency response • Parks, natural areas, and recreation • Solid waste regulation
Service provision and urbanization	8.4		Supporting facilities and systems. Maintain supporting facilities and systems . . . to enable the provision of public facilities and services.
Sanitary system	8.61		Sewer connections. Require all developments within the City limits to be connected to sanitary sewers . . .
Sanitary system	8.62		Combined sewer overflows. Provide adequate public facilities to limit combined sewer overflows to frequencies established by regulatory permits.
Sanitary system	8.63		Sanitary sewer overflows. Provide adequate public facilities to prevent sewage releases to surface waters as consistent with regulatory permits.
Sanitary system	8.65		Sewer extensions. Prioritize sewer system extensions to areas that are already developed at urban densities . .
Sanitary system	8.66		Pollution prevention. Reduce the need for wastewater treatment capacity through land use programs and public facility investments . . .
Sanitary system	8.67		Treatment. Provide adequate wastewater treatment facilities to ensure compliance with effluent standards established in regulatory permits.

Stormwater system	8.68		Stormwater facilities. Provide adequate stormwater facilities for conveyance, flow control, and pollution reduction.
Stormwater system	8.69		Stormwater as a resource. Manage stormwater as a resource for watershed health and public use in ways that protect and restore the natural hydrology, water quality, and habitat of Portland's watersheds.
Stormwater system	8.70		Natural systems. Protect and enhance the stormwater management capacity of natural resources such as rivers, streams, creeks, drainageways, wetlands, and floodplains.
Stormwater system	8.72		Stormwater discharge. Avoid or minimize the impact of stormwater discharges on the water and habitat quality of rivers and streams.
Stormwater system	8.73		On-site stormwater management. Encourage on-site stormwater management . . . through land use decisions and public facility investments.
Stormwater system	8.74		Pollution prevention. Coordinate policies, programs, and investments with partners to prevent pollutants from entering the stormwater system . .
Water systems	8.85		Water quality. Maintain compliance with state and federal drinking water quality regulations.
Water systems	8.86		Storage. Provide sufficient in-city water storage capacity to serve designated land uses, meet demand fluctuations, maintain system pressure, and ensure supply reliability.
Water systems	8.87		Fire protection. Provide adequate water facilities to serve the fire protection needs of all Portlanders . . .
Water systems	8.88		Water pressure. Provide adequate water facilities to maintain water pressure in order to protect water quality and provide for the needs of customers.
Water systems	8.89		Water efficiency. Reduce the need for additional water facility capacity and maintain compliance with state water resource regulations by encouraging efficient use of water by customers within the city.
Water systems	8.90		Service interruptions. Maintain and improve water facilities to limit interruptions in water service to customers.
Public safety and emergency	8.105		Emergency management facilities. Provide adequate public facilities . . . to support emergency management, response, and recovery.

response			
Public safety and emergency response	8.106		Police facilities. Improve and maintain police facilities to allow police personnel to efficiently and effectively respond to public safety needs and serve designated areas.
Public safety and emergency response	8.108		Fire facilities. Improve and maintain fire facilities to serve designated land uses, ensure equitable and reliable response, and provide fire and life safety protection that meets or exceeds minimum established service levels.
Public safety and emergency response	8.110		Community preparedness. Ensure community preparedness and capacity to prevent, withstand, and recover from emergencies and natural disasters through land use decisions and public facility investments.
Public safety and emergency response	8.111		Continuity of operations. Maintain and enhance the City's ability to withstand and recover from natural disasters and human-made disruptions in order to minimize disruptions to public services.
Supporting Documents and Maps, Public Facilities Plans		Citywide Systems Plan, "2035 Comprehensive Plan Citywide Systems Plan, June 2016" a support document to the Comprehe	<p>The update of the 1989 Public Facilities Plan, to address changes such as:</p> <ul style="list-style-type: none"> • City and metropolitan area growth • Aging infrastructure • Service deficiencies • New growth focus on centers and corridors <p>Purposes and objectives include:</p> <ul style="list-style-type: none"> • Serve new residential and employment growth • Meet long-term infrastructure needs • Provide recommended policies and list of significant projects for the Plan

		<p>nsive Plan, guides infrastruct ure investmen ts to meet the needs of current and future Portlander s</p>	
			<p>"[E]xisting ... water, sewer, stormwater ... systems will serve the majority of current and new residents and businesses' needs over the coming decades, resulting in additional demands on existing infrastructure. The City has a large infrastructure maintenance deficit due largely to the age of many systems, chronic underinvestment in preventative maintenance and capital repair, increasing maintenance costs, and the lack of revenue to allow more sustainable investment. At current funding levels, some of Portland's infrastructure will continue to deteriorate." (pp. 13-14.)</p>
			<p>"[T]he ability of the City's infrastructure to accommodate growth depends primarily on the City's ability to resolve current deficiencies. . . Major development efforts . . . can overstretch the ability of existing built and natural infrastructure to meet community demands." (p. 14)</p>
			<p>City infrastructure bureaus estimate that the City "needs to invest approximately \$287 million more than current funding levels per year for each of the next 10 years to replace existing aging assets, maintain existing facilities . . and/or meet service levels. . . . This gap will likely grow for each of the next 10 years." (p. 15.)</p>
			<p>As of 2016 over 80% of the com- bined and sanitary pipes are in good or very good condition. However, "projected investments are not keeping pace with the rapidly aging collection system. . . . 69% combined sewer system pipes are in good to very good condition, but approximately 10% of pipes are at high risk of failure . . ."(p. 100-101)</p>

			"The pumping and treatment systems require regular and more frequent capital investment. While pipes have an estimated 100-year useful life, mechanical and electrical components have a useful life that ranges from 20 to 50 years." (p. 101)
			The combined sewer system and the sanitary sewer system " have hydraulic and condition deficiencies that impact the ability of these systems to serve existing properties at designated service levels. . . Pipe segments that are in poor structural condition are widely distributed throughout the service area with the exception of outer east Portland where the collection system is relatively new." (p. 102)
			In 2013, sanitary and stormwater systems had an estimated annual capital maintenance funding gap of \$12.4 million. (p. 102)
			"Most of the stormwater pipes and sumps in Portland have been in place for decades and were sized with assumptions about climate and land use that were appropriate at they time they were built." Climate change impacts could exacerbate stormwater runoff, increase erosion and sediment in run-off, increase combined sewer overflows, and increase water temperatures. (p. 104)
			Portland's sewer and stormwater rates "are high by regional and national standards. . . Continued public acceptance of rate increases is essential to meeting level of service standards and will require open and clear dialog with the public and decision makers." (p. 105)
			"Per capita water use for single-family residential customers has gone down significantly since 1992 . . . while per capita water demands will continue to decline somewhat over time, the overall demands on the Portland water system will increase due to population growth." (p. 168)
List of Significant Projects	List of Significant Projects, December 2018		"The List of Significant Projects includes significant sanitary sewer, stormwater management, water, and transportation projects necessary to support the land uses designated in the Comprehensive Plan." (p. LP-1) Adoption of Residential Infill Project plan, code and map amendments will require updating this part of the Plan.
Supporting	"Comprehensive Plan		"Density reductions have been proposed in locations farther from identified Centers and Corridors, particularly

<p>Documents and Maps, Growth Scenarios Report</p>		<p>Update, Growth Scenarios Report, July 2015”</p>	<p>in outer East Portland." (p. 6) Down-designations from R5 to R7 in the Proposed Plan have slightly reduced the supply of more affordable small lot single family development." (p. 52)</p> <p>Where are the findings to justify <u>down-zoning</u>, in light of the Project focus on <u>up-zoning</u> existing small lot single family development in much of the east side of Portland? Where is an analysis of the trade-off? Would the Project proposal change if outer east neighborhood lots were not down-zoned? How? Are there Centers and Corridors in outer east Portland where higher density housing and <u>up-zoning</u> is desirable?</p>
		<p>July 2015 Growth Scenarios Report</p>	<p>The Plan estimates Portland's residential capacity at 267,000 dwelling units, more than twice Metro's 2035 housing growth forecast of 123,000 households for Portland. . . "70% of this capacity is in mixed-use corridors and neighborhood centers . . .Other areas with high growth capacity [include] the Lents Town Center and some parts of East Portland."</p> <p>This doesn't appear consistent with the down-zoning of lots in east Portland that is proposed in this Project.</p> <p>"About 11% of the development capacity is in land available for single-family dwelling residential development. . Portland's predominantly single family residential neighborhoods will see limited new housing development and will remain single-family residential neighborhoods." (emphasis added)(p. 17)</p> <p>How is the Project's proposal consistent with these facts?</p>
<p>Supporting Documents and Maps, Buildable Lands Inventory, Buildabl</p>		<p>Buildable Lands Inventory and GIS Model Document</p>	<p>Appendix 1: BLI Model Assumptions, Table 1: Comprehensive Plan and Capacity Assumptions Single Dwelling Zone FAR(Floor Area Ratio) N/A (not applicable)</p>

e Lands Inventor y Docume nts			
Chapter 5 Housing , Middle Housing	5.6		“...Where appropriate, apply zoning that would allow this within a quarter mile of designated centers, corridors with frequent service transit, high capacity transit stations, and within the Inner Ring around the Central City.”
Chapter 5 Housing , Impact Analysis	5.12		Evaluate plans and investments, significant new infrastructure, and significant new development to identify potential disparate impacts on housing choice, access, and affordability for protected classes and low-income households. Identify and implement strategies to mitigate the anticipated impacts
Chapter 5 Housing , Higher- density housing	5.23		Locate higher-density housing, including units that are affordable and accessible, in and around centers to take advantage of the access to active transportation, jobs, open spaces, schools, and various services and amenities
Chapter 5 Housing , Housing preserva tion	5.25		Preserve and produce affordable housing to meet needs that are not met by the private market by coordinating plans and investments with housing providers and organizations.
Chapter 5 Housing , Housing Stability	5.13		Coordinate plans and investments with programs that prevent avoidable, involuntary evictions and foreclosures.
Chapter 10: Land Use Designa tions What is this			The goals and policies in this chapter convey the City’s intent to: <input checked="" type="checkbox"/> Provide a clear definition of each land use designation. <input checked="" type="checkbox"/> Provide guidance for how to update the Zoning Map and Zoning Code.

chapter about			
Chapter 10: Land Use Designations, Land Use designations, Single Dwelling Residential, 3. Single-Dwelling -20,000	10.1		The maximum density is generally 2.2 units per acre. The corresponding zone is R20
Chapter 10: Land Use Designations Land Use designations, Single Dwelling Residential, 4. Single-Dwelling – 10,000	10.1		The maximum density is generally 4.4 units per acre. (9,900 sq.ft/unit). The corresponding zone is R10.
Chapter 10: Land Use Designations, Land Use designations,	10.1		This designation may also be applied in areas where urban public services are available or planned, but the development pattern is already predominantly built-out at 5 to 6 units per acre.(7,920 sq.ft/unit) Single-dwelling residential will be the primary use. The maximum density is generally 6.2 units per acre. The corresponding zone is R7.

<p>Single Dwelling Residential, 5. Single-Dwelling – 7,000</p>			
<p>Chapter 10: Land Use Designations, Land Use designations, Single Dwelling Residential, 6. Single-Dwelling – 5,000</p>	<p>10.1</p>		<p>It is intended for areas where urban public services, generally including complete local street networks and access to frequent transit, are available or planned. Areas within this designation generally have few or very minor development constraints. Single-dwelling residential will be the primary use. The maximum density is generally 8.7 units per acre. (5,007 sq.ft/unit)The corresponding zone is R5.</p>
<p>Chapter 10: Land Use Designations, Land Use designations, Single Dwelling Residential, 7. Single-Dwelling – 2,500</p>	<p>10.1</p>		<p>This designation allows a mix of housing types that are single-dwelling in character. This designation is intended for areas near, in, and along centers and corridors, near transit station areas, where urban public services, generally including complete local street networks and access to frequent transit, are available or planned. Areas within this designation generally do not have development constraints. This designation often serves as a transition between mixed use or multi-dwelling designations and lower density single dwelling designations. The maximum density is generally 17.4 units per acre. (2,489 sq.ft/unit) The corresponding zone is R2.5</p>
<p>Chapter 10: Land Use Designations</p>	<p>10.1</p>		<p>This designation is intended for areas near, in, and along centers and corridors where urban public services, generally including complete local street networks and access to frequent transit, are available or planned. Areas within this designation generally do not have development constraints and may include larger development sites. The maximum density is generally 14.5 units per acre(3,004 sq.</p>

<p>tions, Land Use designat ions, Multi- Dwelling Resident ial, 8. Multi- Dwelling -3,000</p>			<p>ft./unit), but may go up to 21 units per acre(2,071 sq.ft./unit) in some situations. The corresponding zone is R3.</p>
<p>Chapter 10: Land Use Designa tions, Land Use designat ions, Multi- Dwelling Resident ial, 9. Multi- Dwelling -2,000</p>	<p>10.1</p>		<p>This designation is intended for areas near, in, and along centers and corridors and transit station areas, where urban public services, generally including complete local street networks and access to frequent transit, are available or planned. Areas within this designation generally do not have development constraints. The maximum density is generally 21.8 units per acre(1,998 sq.ft./unit), but may be as much as 32 units per acre (1,361 sq.ft./unit) in some situations. The corresponding zone is R2.</p>
<p>Chapter 10: Land Use Designa tions, Land Use designat ions, Multi- Dwelling Resident ial, 10. Multi-</p>	<p>10.1</p>		<p>The scale of development is intended to reflect the allowed densities while being compatible with nearby single-dwelling residential. The designation is intended for areas near, in, and along centers and corridors, and transit station areas, where urban public services, generally including complete local street networks and access to frequent transit, are available or planned. Areas within this designation generally do not have development constraints. The maximum density is generally 43 units per acre (1,013 sq.ft./unit), but may be as much as 65 units per acre (670 sq.ft./unit) in some situations. The corresponding zone is R1</p>

Dwelling -1,000			
Chapter 10: Land Use Designa tions, Land Use designat ions, Multi- Dwelling Resident ial, 11. High Density Multi- Dwelling -	10.1		<p>This designation is intended for the Central City, Gateway Regional Center, Town Centers, and transit station areas where a residential focus is desired and urban public services including access to high-capacity transit, very frequent bus service, or streetcar service are available or planned. This designation is intended to allow high-density multi-dwelling structures at an urban scale. Maximum density is based on a floor-area-ratio, not on a unit-per-square-foot basis. Densities will range from 80 to 125 units per acre (544.5 sq ft/unit to 346 sq.ft/unit)). The corresponding zone is RH.</p>

Tamara DeRidder

#103522 | March 9, 2020

Testimony to **Portland City Council** on the **Residential Infill Project, Recommended Draft**

Revised testimony attachments from RCPNA attached.

Testimony is presented without formatting.

3-10-20
Doug Klotz
1908 SE 35th Pl
Portland OR 97214

Re: Residential Infill Project Amendments
Mayor Wheeler and Commissioners:

I am writing in support of the Residential Infill Project and Amendments 1-4, as well as “Deep Affordability” Amendment 6. I oppose Amendments 5, 7, and 8-17. This project will enable construction of smaller, less expensive units in most parts of our city, and supply much needed housing, in all neighborhoods. I agree with the testimony of Portland: Neighbors Welcome, which lays out the reasoning for supporting Amendment 6, and opposing (withdrawn) #5, and #7.

Amendment 6, with a Deeper Affordability Bonus, will allow non-profit developers like Habitat for Humanity, Proud Ground, PCRI and others to reduce the amount of subsidy needed per home by building up to 6 units on a residential lot, as long as at least half are affordable to rent at 60% of Median family income, or affordable to buy at 80% of MFI. Please adopt amendment 6.

While these provisions will not be used widely, they will be very valuable for these non-profits, who will be able to supply housing with less of the subsidies from various sources that they utilize now. The 1.2:1 Floor Area Ratio ensures that units up to 1000 square feet can be built.

I am glad to see that Amendment 5 is no longer in the proposal. This was a bad idea, that would have prohibited builders from using the 3- and 4-plex models to build on less expensive land in neighborhoods without curbs. It was opposed by Verde, Hacienda CDC, Oregon Walks, the Cully Neighborhood Association and others.

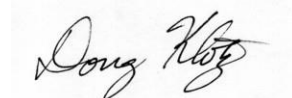
We urge the city to work on a long-term solution for infill sidewalks, including alternative street designs, and a different fee structure that treats all lot sizes fairly.

I oppose Amendment 7. While well-intentioned, this could have the effect of removing the 3- to 6-unit options. Structures would still be demolished, but they would be replaced by single houses or duplexes, instead of the less expensive homes that could be built. The \$15,000 fee to seek a Council Review is prohibitive for these smaller projects, and would effectively ban 3,4,5, and 6- unit buildings.

I oppose Amendments 8-17. These would have blocked 3- to 6-unit projects in large parts of the city, created unworkable standards, and excluded wealthy neighborhoods from the project. These should remain off the table. I support Technical Amendments 1-4.

I urge Council to adopt the Residential Infill Project, with amendments 1-4 and 6, as soon as possible, with an effect date in the coming Fall season, or earlier.

Thank you.



Doug Klotz

#103507 | March 10, 2020

Testimony to **Portland City Council** on the **Residential Infill Project, Recommended Draft**

Attached is my letter in Support of the Residential Infill Project and amendments 1-4, and 6. Thank you. Doug Klotz

Testimony is presented without formatting.

Virginia Feldman

#103508 | March 10, 2020

Testimony to **Portland City Council** on the **Residential Infill Project, Recommended Draft**

As a person of faith, I & our church strongly support Amendment 6 of the Residential Infill Project, which enables non-profit housing providers to build truly affordable units in small projects and oppose amendment 7, which would not lead to re-use, but only would lead to more expensive homes. Also we support the Residential Infill Project amendments 1-4, which will create more housing at lower prices in many neighborhoods to welcome people to Portland. Please, continue working to reduce displacement citywide with renter protections, And, in the future, please work to make more significant up-zones of exclusive areas near transit and jobs-- to allow mixed-income and really affordable apartments. thank you Dr Virginia

Testimony is presented without formatting.



222 NW Davis Street
Suite 309
Portland, OR 97209-3900
503.222.1963
www.oeconline.org

March 10, 2020

City Council
1221 SW 4th Ave, Rm 130
Portland OR 97204

Mayor Wheeler and City Commissioners:

Oregon Environmental Council appreciates the opportunity to testify on the amendments to the Residential Infill Project. Founded in 1968, Oregon Environmental Council (OEC) is a nonprofit, nonpartisan, membership-based organization. We advance innovative, collaborative and equitable solutions to Oregon's environmental challenges for today and future generations.

Oregon Environmental Council supports prompt adoption and implementation of the Residential Infill Project. The Residential Infill Project proposal is an opportunity to begin to change city policy shaping residential redevelopment over time to be more supportive of transit, biking and walking for transportation, reducing greenhouse gas emissions and air pollution. It would allow more people the option to make a home in close-in neighborhoods that are rich in access to jobs, services, schools and other opportunities.

Oregon Environmental Council strongly supports Amendment 6, because it would allow more density and support more affordability, amplifying the climate and affordability benefits of the original proposal. OEC opposes Amendment 7 and the Amendment Concepts because they would reduce density and affordability.

The Residential Infill Project proposal is a step toward a more equitable and sustainable future Portland. Oregon Environmental Council urges you to amend it with Amendments 1-4 and 6, and to adopt and implement the amended proposal as soon as possible. OEC also urges you to consider this a first step toward a future Portland where more people can live close to jobs, schools, services, stores, and community gathering places. The growing climate crisis and the housing affordability crisis demand swift, strong action, and this is the beginning, not the end.

Thank you,

Sara Wright
Program Director, Transportation

Sara Wright

#103509 | March 10, 2020

Testimony to **Portland City Council** on the **Residential Infill Project, Recommended Draft**

Please find attached testimony from Oregon Environmental Council.

Testimony is presented without formatting.

Steve Bozzone

#103510 | March 10, 2020

Testimony to **Portland City Council** on the **Residential Infill Project, Recommended Draft**

I am writing in support of the Residential Infill Project. I support Amendments 1-4 and especially Amendment 6, the deeper affordability measure. I strongly oppose Amendments 7-17 as they would prevent multi family developments in affluent neighborhoods and add unworkable standards that would undermine the spirit and purpose of RIP. Please vote YES on RIP and Amendments 1-4 and 6. After RIP is passed, please continue to work on measure to improve housing affordability and prevent displacement in our city. Thank you. Sincerely, Steve Bozzone NE Portland

Testimony is presented without formatting.

Brooke Best

#103511 | March 10, 2020

Testimony to **Portland City Council** on the **Residential Infill Project, Recommended Draft**

I'm submitting the following testimony regarding two of RIP's proposed amendments: Amendment 6 (Deeper Affordability Bonus) and Amendment 7 (Historic Resource Demolition Disincentive). IN OPPOSITION of Amendment 6: This amendment would allow up to 6 units with additional height and mass building on all R2.5, R5, and R7 single family zoned lots if at least half of the units are affordable (those earnings not more than 60% of Mean Family Income). It would also grant an additional height bonus of 5 feet in the R5 and R7 zones, with a maximum building height of up to 35 feet tall. (As a comparison, the median house size in Portland is 1,500 square feet and 15 feet tall.) This is a major departure from RIP's stated purpose: "Additional housing options, when built at a scale and form compatible with single-dwelling neighborhoods, are considered the "middle" housing spectrum. Duplexes, triplexes, and fourplexes along with ADUs comprise the part of the spectrum that the Residential Infill Project aims to expand. These new units will be built at a size that complements older, existing homes that have defined Portland neighborhoods for decades." Amendment 6 fails to address major goals and policies of the 2035 Comp Plan, which serves as the guiding framework for municipal code changes, specifically Goal 4.A regarding context-sensitive design and development. According to Table 110-2 of the amendment package, multi-dwelling units (except duplexes on corner lots) are not required in R-10 and R-20 zones. Why doesn't this amendment apply to those zones? How does this meet HB 2001 requirements for duplexes everywhere on all residential properties? It should also be pointed out that a multi-dwelling zone already exists: the new RM1 zone allowed by right under Better Housing by Design (page 18 BHBD Amended Staff Report). The new zone allows 5- to 6-unit buildings containing 6,000 square feet with a height of 35 feet, with the intent of creating a scale transition from multi-dwelling to single-dwelling zones. This is in alignment with the Comp Plan's Policy 4.30 to ensure that new high-density "incorporates design elements that soften transitions in scale and limit light and privacy impacts on adjacent residents." I support the intention of a bonus provision to increase the availability of "deeply affordable" units; however, I oppose allowing incompatible small apartment buildings in single-dwelling zones to achieve this end. As an alternative, could RIP modify the affordability bonus threshold for a triplex or fourplex FAR bonus (for one unit) from 80% to 60% of median family income? This amendment allows more "scatter-shot" development, which ignores several policies (Policies 3.12, 4.20) laid out in the 2035 Comp Plan that recommend focusing density around centers and along corridors with frequent and reliable transit. It would result in out-of-scale infill development that is inconsistent with sensible planning and incompatible with

existing neighborhoods, in conflict with policies 4.3, 4.27, 4.30, 4.48. Amendment 6 is not responsible stewardship and would result in more demolition of sound, habitable homes, in contradiction to policies 4.17 and 4.28. With each iteration, RIP has become more removed from achieving its original goal. Amendment #6 takes us ever further afield in terms of creating meaningful, compatible infill. It is also likely to result in more demolitions. I strongly oppose Amendment 6 due to its potential to dramatically and permanently alter neighborhood character – and result in increased demolition and displacement risks. IN SUPPORT of Amendment 7: I strongly support the inclusion of a Historic Resource Demolition Disincentive to single-dwelling zones, in alignment with the provision adopted under Better Housing by Design. Discouraging the demolition of historic buildings is also consistent with the 2035 Comp Plan Policy 4.17. Furthermore, it the most sustainable approach and retains naturally-occurring affordable housing. This amendment only would extend to contributing resources in local Conservation Districts the same demolition review process already afforded to those resources in Historic Districts. It does not encompass the majority of ranked resources, such as those designated as significant, in the Historic Resource Inventory.

Testimony is presented without formatting.

Brad Baker

#103513 | March 10, 2020

Testimony to **Portland City Council** on the **Residential Infill Project, Recommended Draft**

Hello Council, I'm following up to again ask you to support RIP and to offer my opinion on the proposed amendments. RIP is a great first step toward addressing the problems with our current zoning that will be a first step on the path to a more sustainable and inclusive Portland. In addition to supporting RIP, I ask that you please oppose amendment 5. We should allow missing middle housing across all Portland, including under-improved streets. I ask that you please support amendment 6, allowing of up to 6-plexes when they are affordable. This will help affordable housing developers build more affordable housing in Portland, something we desperately need. I'm particularly excited about this amendment because it will allow for affordable housing for families in our neighborhoods and not just on busy streets. This will be great for families in Portland. I ask that you please oppose amendment 7. I live in a conservation district and I feel that conservation/historic districts are often weaponized as a way to exclude others from them. Given that we're in the midst of a climate and housing crisis, I think we need to re-think our policies around historic/conservation districts and if preserving close in neighborhoods is the right path for an equitable and climate-friendly Portland. Thanks so much for listening!

Testimony is presented without formatting.

Rose City Park Neighborhood Association RIP Document Review

Conducted February 2020, published 3/4/2020

Participants: Gloria Gardner & Tamara DeRidder, AICP

We reviewed the public documents available on-line (internet at <https://beta.portland.gov/bps>) regarding, or relevant to, the Residential Infill Project (the Project): the adopted 2035 Comprehensive Plan and supporting documents, the Portland Plan, Citywide Systems Plan, Growth Scenarios report, Housing Affordability report, Housing Demand and Supply Projections report, Updates on Key Housing Supply and Affordability Trends report, Household Demand and Supply Projections report, Buildable Lands Inventory and Growth Allocation GIS model, Revised, April 2016, Code Reconciliation Project amendments to Code Title 33 Housing, Zoning and Comprehensive Plan Map amendments, staff report, Potential Amendment Concepts discussed by the City Council (the Council) in January and February 2020, and new state zoning mandates for urban residential development.

The August 2019 Staff Report and Map Amendments documents include findings of compliance with the Plan's five overarching Guiding Principles (*see Staff Report, page 3*), and housing findings (*see Staff report*). The Staff Report mentions additional policy directions in "Appendix A: Guidance From the Comprehensive Plan." (*Staff Report, p. 3*) The only Appendix A that we found on the Project web site is a "Revised economic analysis on the proposed changes to the single-dwelling zone development standards."

The Plan requires that the proposed Project Code and Map amendments must be evaluated for compliance with ***all*** of the relevant Plan Goals and Policies. Based on our review, we believe that ***none of the Project's proposed amendments have been evaluated according to many of the relevant Plan Goals and Policies.***



March 4, 2020

City of Portland

Attn: Mayor Ted Wheeler & City Commissioners(cctestimony@portlandoregon.gov)

1221 SW Fourth Ave.

Portland, OR 97204

Subject: RCPNA Opposes Council Residential Infill Project (RIP) Amendments and Request Remand of RIP to Planning & Sustainability Commission for failure to Comply with 2035 Comprehensive Plan

Dear Mayor and Commissioners,

On Tues. March 3, 2020, the Rose City Park Neighborhood Association held a Special Board Meeting and voted unanimously to:

1. Oppose the City Council proposed Amendments to the RIP that have been published as Residential Infill Project Potential Amendment Concepts dated Feb. 13, 2020.
2. Support the findings and conclusions contained in this letter that document the failure of the RIP to comply with the City of Portland's 2035 Comprehensive Plan (with minor edits and additions); and
3. Request the City Council remand the Residential Infill Project to the Planning and Sustainability Commission.

After reviewing the available information on the City of Portland's Residential Infill Project, see list in Exhibit A, we have determined that there are only a few supportive documented findings by BPS staff for the RIP that regard the goals and policies on the City of Portland's adopted 2035 Comprehensive Plan.

The 2035 Plan should serve as the foundation from which all changes to the Municipal Code are to be made or the Plan itself needs to be amended. Neither of these choices are being offered to the City Council by staff in the public hearing proceedings. Therefore, the RIP needs to be remanded to the Planning and Sustainability for failure to comply with one of these two options.

Finding 1. Policy 1.10 of the 2035 Comprehensive Plan (the Plan) requires that amendments to the Plan, or such Plan implementation tools as the Planning and Zoning Code (the Code) and Zoning and Comprehensive Plan Maps (the Maps), must comply with the Plan:

"Ensure that amendments to the Comprehensive Plan's elements, supporting documents, and implementation tools comply with the Comprehensive Plan. 'Comply' means that ***amendments must be evaluated against the Comprehensive Plan's applicable goals and policies*** and on

balance be equally or more supportive of the Comprehensive Plan as a whole than the existing language or designation." (*emphasis added*)

Appendix B of the RIP Recommended Draft provides findings on Displacement Risk and Mitigation that address Plan policies 5.15 and 5.16. Therefore, the RIP fails to satisfy with the Comprehensive Plan Policy 1.10 and its supporting documents, with the exception of policies 5.15 and 5.16.

Finding 2. The PSC proposes the following density changes to Single Dwelling Zone of the City of Portland Municipal Code as Table 110-4 in Volume 2, Residential Infill Project – Recommended Draft, Zoning Code Amendments:

Table 110-43 Summary of Development Standards In Single-Dwelling Zones							
Standard	RF	R20	R10	R7	R5	R2.5 detached-attached See 33.110.240.C	
Maximum FAR - 1 total dwelling unit - 2 total dwelling units [1] - 3 or more total dwelling units [1] (See 33.110.210 and 33.110.265)	no limit	no limit	no limit	0.4 to 1 0.5 to 1 0.6 to 1	0.5 to 1 0.6 to 1 0.7 to 1		0.7 to 1 0.8 to 1 0.9 to 1
Maximum FAR with Bonus - 1 total dwelling unit - 2 total dwelling units [1] - 3 or more total dwelling units [1] (See 33.110.210 and 33.110.265)	NA	NA	NA	0.4 to 1 0.6 to 1 0.7 to 1	0.5 to 1 0.7 to 1 0.8 to 1		0.7 to 1 0.9 to 1 1 to 1
Maximum Height (See 33.110.215)	30 ft.	30 ft.	30 ft.	30 ft.	30 ft.	35 ft.	35 ft.
Minimum Setbacks - Front building setback - Side building setback - Rear building setback - Garage entrance setback (See 33.110.220)	20 ft. 10 ft. 10 ft. 18 ft.	20 ft. 10 ft. 10 ft. 18 ft.	20 ft. 10 ft. 10 ft. 18 ft.	15 ft. 5 ft. 5 ft. 18 ft.	10 ft. 5 ft. 5 ft. 18 ft.	10 ft. 5 ft. 5 ft. 18 ft.	10 ft. 0/5 ft. 5 ft. 18 ft.
Maximum Building Coverage (See 33.110.225)	See Table 110-6	See Table 110-6	See Table 110-6	See Table 110-6	See Table 110-6		See Table 110-6
Required Outdoor Area - Minimum area - Minimum dimension (See 33.110.240.235)	250 sq. ft. 12 ft. x 12 ft.	250 sq. ft. 12 ft. x 12 ft.	250 sq. ft. 12 ft. x 12 ft.	250 sq. ft. 12 ft. x 12 ft.	250 sq. ft. 12 ft. x 12 ft.	250 sq. ft. 12 ft. x 12 ft.	200 sq. ft. 10 ft. x 10 ft.

[1] Including accessory dwelling units.

This Table promulgates the use of Floor Area Ratio (FAR) in the Single-Dwelling zones and adds 2 or 3 or more residential units allowed per parcel by zone. The use of FAR for Single-Dwelling Zones together with more than 1 residential unit density per lot conflicts with the 2035 Comprehensive Plan Buildable Lands Inventory and Growth Allocation GIS Model¹, Appendix 1 – BLI Model Assumptions, Table 1 - Comprehensive Plan and Capacity Assumptions. Included in this table are N/A (not applicable) entered for the FAR for the Comp_Zone R20, R10, R7, R5 and R2.5, allocation of only one residential unit calculated by lot size of each zone (20,000, 10,000, 7,000, 5,000, and 2,500 square ft, respectively) and identified as Single-Family Residential under Gen_Zone.

The Buildable Lands Inventory and Growth Allocation GIS Model document establishes its importance as a basis for the Comprehensive Plan documentation in its Overview by stating:

“Maximum land use intensities in Portland are controlled in three ways:

1. establishing floor area ratio (FAR) limit and maximum height limits. FAR is the ratio of a building's total square footage to the square footage of the underlying development parcel; or
2. limiting the total number of multi-family residential units; or
3. assigning minimum lot sizes for new single-family residential development.

These limits govern building size and bulk, and – among other objectives – create reasonable certainty for utility and transportation providers regarding the intensities of use for which they must provide infrastructure. FAR and building height limits are the primary limiting factor on development in employment, commercial, and high-density residential areas.”

The use of Floor Area Ratio and the inclusion of up to more than 3 residential units per lot in Single-Dwelling zones with the proposed RIP were considered in the development of the Buildable Lands and Inventory and Growth Allocation GIS Model that served as a basis for the utility and transportation assumptions in the 2035 Comprehensive Plan. Therefore, the PSC Recommended Draft RIP fails to comply with the 2035 Comprehensive Plan and Buildable Lands Inventory and Growth Allocation GIS model, Revised, April 2016, adopted by Ord. 187831, Vol. 1.1.J., pages 132 through 163.

Finding 3. On page iii under Map Changes in Volume 1 of the Residential Infill Project – Recommended Draft, Aug. 2019, it states:

“The Revised Proposed Draft adds increased housing options to the (Single-Dwelling)base zone and proposes a new Constrained Sites (‘z’) overlay zone for properties that are not eligible for these housing options. Consequently, over 90 percent of lots in the R7, R5 and R2.5 zones will be eligible to use these additional housing options.” This means that 90 % of the 132, 554 total acres zoned R7, R5 or R2.5, or 119,299 acres, will be impacted by this the Base Zone amendment allowing up to 4 residential units per lot. City staff has failed to document that proper public notification was sent prior to the Planning and Sustainability RIP public hearings identifying this proposed Base Code change as required by City of Portland Municipal Code 33.740.020(B) Commission Review. Therefore, the RIP Recommended Draft forwarded by the Planning and Sustainability Commission fails to satisfy City of Portland Municipal Code 33.740.020(B) Commission Review.

Finding 4. The 2035 Comprehensive Plan, Chapter 10: Land Use Designations states,

“The goals and policies in this chapter convey the City’s intent to:

- Provide a clear definition of each land use designation.
- Provide guidance for how to update the Zoning Map and Zoning Code.”

Under Policy 10.1 in this same Plan chapter identifies Land Use designations, Single Dwelling Residential with the following information:

3. Single-Dwelling-20,000	The maximum density is generally 2.2 units per acre. The corresponding zone is R20
4. Single-Dwelling-10,000	The maximum density is generally 4.4 units per acre. (9,900 sq.ft/unit). The corresponding zone is R10.

5. Single-Dwelling-7,000	This designation may also be applied in areas where urban public services are available or planned, but the development pattern is already predominantly built-out at 5 to 6 units per acre.(7,920 sq.ft/unit) Single-dwelling residential will be the primary use. The maximum density is generally 6.2 units per acre. The corresponding zone is R7.
6. Single-Dwelling – 5,000	It is intended for areas where urban public services, generally including complete local street networks and access to frequent transit, are available or planned. Areas within this designation generally have few or very minor development constraints. Single-dwelling residential will be the primary use. The maximum density is generally 8.7 units per acre. (5,007 sq.ft/unit)The corresponding zone is R5.
7. Single-Dwelling – 2,500	This designation allows a mix of housing types that are single-dwelling in character. This designation is intended for areas near, in, and along centers and corridors, near transit station areas, where urban public services, generally including complete local street networks and access to frequent transit, are available or planned. Areas within this designation generally do not have development constraints. This designation often serves as a transition between mixed use or multi-dwelling designations and lower density single dwelling designations. The maximum density is generally 17.4 units per acre. (2,489 sq.ft/unit) The corresponding zone is R2.5

The PSC proposed Table 110-4 Summary of Development Standards in Single-Dwelling zones in Volume 2, Residential Infill Project – Recommended Draft, Zoning Code Amendments allows 3 or more total dwelling units for property zoned R-20, R-10, R-7, R-5, and R2.5. Therefore, Table 110-4 Summary of Development Standards in Single-Dwelling Zones in Volume 2, Residential Infill Project-Recommended Draft, Zoning Code Amendments fails to satisfy the 2035 Comprehensive Plan, Chapter 10, Policy 10.1 and subsections 3-7.

Finding 5. Policy 1.14 of the 2035 Comprehensive Plan requires consideration of impacts on the existing and future availability and adequate capacity of urban public facilities when amending Plan implementation tools, such as the zoning code:

“Public facility adequacy. Consider impacts on the existing and future availability and capacity of urban public facilities and services when amending Comprehensive Plan elements and implementation tools.”

The RIP proposes up to 2-times the number of residential units per lot in the Single-Dwelling zone not covered by the “z” overlay than is supported by the adopted Plan. No public facility adequacy study has been published by the city supporting this added density. Therefore, the recommended RIP fails to satisfy the 2035 Comprehensive Plan Policy 1.14.

Finding 6. Chapter 8 of the 2035 Comprehensive Plan, Public Facilities and Services, establish the foundation of public investment and funding through meticulous inventories of the city’s public facilities. Capacity analyses are then conducted based on the proposed planned residential density of the of the area to be serviced. This establishes some predictability for system upgrades as city investments. Policy 8.21 under Public Investment states:

“System capacity. Establish, improve, and maintain public facilities and services at levels appropriate to support land use patterns, densities, and anticipated residential and employment growth, as physically feasible and as sufficient funds are available.”(*emphasis added*)

The PSC Recommended Draft RIP proposes 4 and up to 6 residential units on properties that are designated as Single Dwelling in the City of Portland Municipal Code based on Residential Infill

Project, Volume 2: Zoning Code and Comprehensive Plan Amendments, Recommended Draft August 2019, and Residential Infill Project Potential Amendment Concepts, dated February 13, 2020. This recommendation doubles and even triples the land use densities established Policy 10.1 of the Comprehensive Plan. No city-wide System Capacity Analysis supporting the Residential Infill Project densities in the Single Dwelling zones has been published by the City of Portland. Therefore, the PSC Recommended Draft RIP fails to satisfy the 2035 Comprehensive Plan Policy 8.21 – System Capacity.

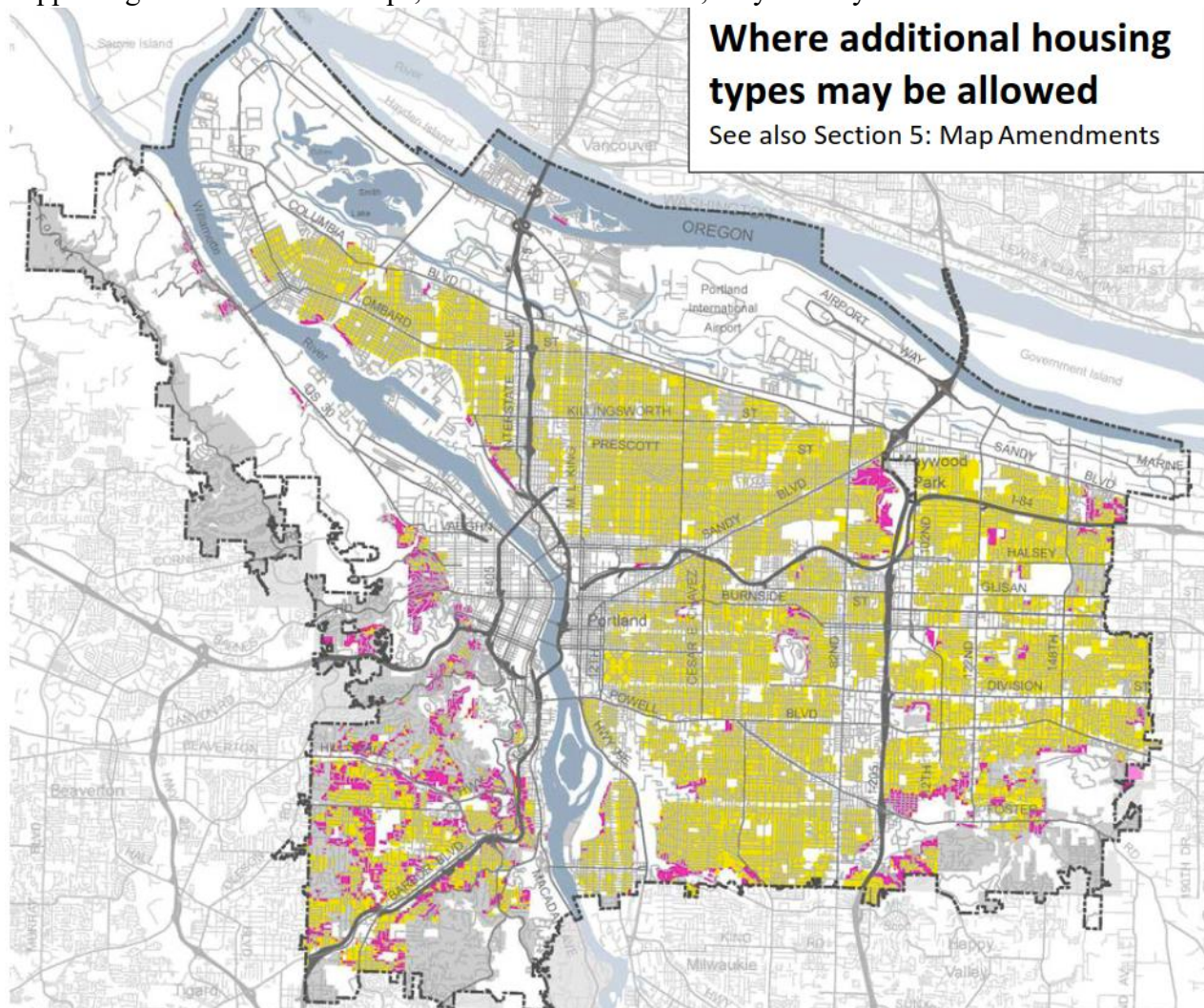
Finding 7. The 2035 Comprehensive Plan Chapter 5 – Housing, Middle Housing states Policy 5.6(part) “...Where appropriate, apply zoning that would allow this within a quarter mile of designated centers, corridors with frequent service transit, high capacity transit stations, and within the Inner Ring around the Central City.”. Instead, the PSC recommends a city-wide implementation of Middle Housing in the Single Dwelling district through RIP in their Recommended Draft. Therefore, the PSC recommended draft fails to satisfy Policy 5.6 – Middle Housing.

Finding 8. The 2035 Comprehensive Plan Chapter 5 – Housing, Higher Density Housing Policy 5.23 states, “Locate higher-density housing, including units that are affordable and accessible, in and around centers to take advantage of the access to active transportation, jobs, open spaces, schools, and various services and amenities.” The PSC recommended RIP allows 4 residential units on Single Dwelling parcels zoned R5 that contain 5,000 square feet. This equates to 1,250 square feet/unit in the R5 zone. Chapter 10 of the 2035 Comprehensive Plan establishes the Land Use Designations and densities. The proposed 1,250 sq.ft/ unit level of density correlates with the Multi-Dwelling Residential R2 zone at 21.8 units per acre up to as much as 32 units per acre. Chapter 10: Land Use Designations, Land Use Designations, Multi-Dwelling Residential, 9. Multi-Family-2,000 further states about the R2 zone, “This designation is intended for areas near, in, and along centers and corridors and transit station areas, where urban public services, generally including complete local street networks and access to frequent transit, are available or planned. Areas within this designation generally do not have development constraints”. The proposed RIP density is proposed to apply city-wide in the Single Dwelling zones with no consideration these attributes with the exception of the properties being rezoned from R5 to R2.5. Therefore, the PSC Recommended Draft RIP fails to support the Policy 5.23 of the 2035 Comprehensive Plan. Further, the PSC Recommended Draft RIP subverts the Single Dwelling designation by inserting Multi-Family level densities.

Finding 9. The impacted land area of the proposed RIP is identified by the map, below, is from page 15 of Residential Infill Project, an update to Portland’s Single-Dwelling Zoning Rules, Recommended Draft August 2019, Volume 1, Staff Report and Map Amendments. No supportive findings have been published by the City of Portland that address the following 2035 Comprehensive Plan Policies relating to this impacted area relating to Public Facilities and Services: 8.22 – Equitable Service; 8.23 – Asset Management; 8.24 – Risk Management; 8.27-Cost- effectiveness; 8.28- Shared Costs; 8.3 Urban Service delivery; 8.4 Supporting facilities and systems; 8.62 Combined sewer overflows; 8.63 Sanitary sewer overflows; 8.65- Sewer extensions; 8.66 – Pollution prevention; 8.67-Treatment; 8.86 – Water systems, Storage; 8.87 – Water Systems, Fire Protection; 8.88 – Water Systems, Water Pressure; 8.89 – Water Systems, Water efficiency; 8.105 Public Safety and emergency, Emergency management facilities;

8.106 – Public safety and emergency response, Police Facilities; 8.208 Public Safety and emergency response, Fire facilities; and under Supporting Documents and Maps, Public Facilities Plans, Citywide Systems Plan, “2035 Comprehensive Plan Citywide Systems Plan, June 2016”

Therefore, the proposed RIP fails to satisfy the 2035 Comprehensive Plan policies 822, 8.23, 8.24, 8.27, 8.28, 8.3, 8.4, 8.62, 8.63, 8.66, 8.67, 8.86, 8.87, 8.88, 8.89, 8.105, 8.106, 8.208, and the “2035 Comprehensive Plan Citywide Systems Plan, June 2016” identified in the 2035 Comprehensive Plan, Supporting Documents and Maps, Public Facilities Plans, Citywide Systems Plan.



Areas in yellow indicate the R2.5, R5 and R7 zones that are proposed to allow the additional housing types. The magenta areas indicate natural hazard or resource constraints, and the gray areas indicate low-density RF, R20 and R10 zones. Note that minimum lot size and street condition requirements which could limit additional housing types are not reflected in this map.

Therefore, based on the finding of fact stated above, the Planning and Sustainability Commission Recommended Residential Infill Project Draft of August 2019 fails to satisfy numerous elements of the

City of Portland 2035 Comprehensive Plan. This proposal must be remanded to the Planning and Sustainability Commission for completion prior to final review by the City Council.

In the attached exhibits you will find the resources accessed from which these conclusions were drawn and a list of RIP related 2035 Comprehensive Plan Goals, Policies, and supportive documents that should be considered in the Commission's review.

Please let me know if you have any questions.

Respectfully submitted,



Tamara DeRidder, AICP
Chairwoman, Rose City Park Neighborhood Association (RCPNA)
1707 NE 52nd Ave.
Portland, OR 97213

Exhibits: A. RCPNA RIP Document Review
 B. RIP Relevant Plan, Goals, and Supportive Documents

CC: Alison Stoll, Executive Director Central NE Neighbors Coalition
 The Oregonian
 The Tribune
 The Willamette Week
 Hollywood Star

RIP Relevant Adopted Plan Goals, Policies, and Supportive Documents

Recommended by: RCPNA Board, RCPNA Chairwoman and Land Use Planner Tamara DeRidder, AICP, and RCPNA Member and retired Land Use Planner Gloria Gardner.
Date: March 4, 2020

In order to assist staff and the Commission in the remand on the RIP below describes and quotes plan and supporting document text of what we believe are relevant Plan Goals and Policies for this project that have not yet been addressed.

2035 Comprehensive Plan Chapter	Plan Policy	Supporting document	Relevant text
Chapter 1 Plan elements and administration	1.14		Public facility adequacy. Consider impacts on the existing and future availability and capacity of urban public facilities and services when amending Comprehensive Plan elements and implementation tools.
Chapter 8 Public facilities and services Goal 8.A: Quality public facilities and services Goal 8.B: Multiple benefits Goal 8.C: Reliability			

<p>y and resiliency</p> <p>Goal 8.E: Sanitary and stormwater systems</p> <p>Goal 8.G: Water</p> <p>Goal 8.I: Public safety and emergency response</p>			
Public investment	8.21		System capacity. Establish, improve, and maintain public facilities and services at levels appropriate to support land use patterns, densities, and anticipated residential and employment growth, as physically feasible and as sufficient funds are available.
Public investment	8.22		Equitable service. Provide public facilities and services to alleviate service deficiencies and meet level-of-service standards for all Portlanders . . .
Public investment	8.23		Asset management. Improve and maintain public facilities systems using asset management principles to optimize preventative maintenance, reduce unplanned reactive maintenance, achieve scheduled delivery, and protect the quality, reliability, and adequacy of City services.
Public investment	8.24		Risk management. Maintain and improve Portland's public facilities to minimize or eliminate economic, social, public health and safety, and environmental risks.
Funding	8.27		Cost-effectiveness. Establish, improve, and maintain the public facilities necessary to serve designated land uses in ways that cost-effectively provide desired levels of service, consider facilities' lifecycle costs, and maintain the City's long-term financial sustainability.

Funding	8.28		Shared costs. Ensure the costs of constructing and providing public facilities and services are equitably shared by those who benefit from the provision of those facilities and services.
Funding	8.29		System development. Require private or public entities whose prospective development or redevelopment actions contribute to the need for facility improvements, extensions, or construction to bear a proportional share of the costs.
Service provision and urbanization	8.3		Urban service delivery. Provide the following public facilities and services at urban levels of service to urban lands within the City's boundaries of incorporation: <ul style="list-style-type: none"> • Pubic rights-of-way, streets, and public trails • Sanitary sewers and wastewater treatment • Stormwater management and conveyance • Flood management • Water supply • Police, fire, and emergency response • Parks, natural areas, and recreation • Solid waste regulation
Service provision and urbanization	8.4		Supporting facilities and systems. Maintain supporting facilities and systems . . . to enable the provision of public facilities and services.
Sanitary system	8.61		Sewer connections. Require all developments within the City limits to be connected to sanitary sewers . . .
Sanitary system	8.62		Combined sewer overflows. Provide adequate public facilities to limit combined sewer overflows to frequencies established by regulatory permits.
Sanitary system	8.63		Sanitary sewer overflows. Provide adequate public facilities to prevent sewage releases to surface waters as consistent with regulatory permits.
Sanitary system	8.65		Sewer extensions. Prioritize sewer system extensions to areas that are already developed at urban densities . .
Sanitary system	8.66		Pollution prevention. Reduce the need for wastewater treatment capacity through land use programs and public facility investments . . .
Sanitary system	8.67		Treatment. Provide adequate wastewater treatment facilities to ensure compliance with effluent standards established in regulatory permits.

Stormwater system	8.68		Stormwater facilities. Provide adequate stormwater facilities for conveyance, flow control, and pollution reduction.
Stormwater system	8.69		Stormwater as a resource. Manage stormwater as a resource for watershed health and public use in ways that protect and restore the natural hydrology, water quality, and habitat of Portland's watersheds.
Stormwater system	8.70		Natural systems. Protect and enhance the stormwater management capacity of natural resources such as rivers, streams, creeks, drainageways, wetlands, and floodplains.
Stormwater system	8.72		Stormwater discharge. Avoid or minimize the impact of stormwater discharges on the water and habitat quality of rivers and streams.
Stormwater system	8.73		On-site stormwater management. Encourage on-site stormwater management . . . through land use decisions and public facility investments.
Stormwater system	8.74		Pollution prevention. Coordinate policies, programs, and investments with partners to prevent pollutants from entering the stormwater system . .
Water systems	8.85		Water quality. Maintain compliance with state and federal drinking water quality regulations.
Water systems	8.86		Storage. Provide sufficient in-city water storage capacity to serve designated land uses, meet demand fluctuations, maintain system pressure, and ensure supply reliability.
Water systems	8.87		Fire protection. Provide adequate water facilities to serve the fire protection needs of all Portlanders . . .
Water systems	8.88		Water pressure. Provide adequate water facilities to maintain water pressure in order to protect water quality and provide for the needs of customers.
Water systems	8.89		Water efficiency. Reduce the need for additional water facility capacity and maintain compliance with state water resource regulations by encouraging efficient use of water by customers within the city.
Water systems	8.90		Service interruptions. Maintain and improve water facilities to limit interruptions in water service to customers.
Public safety and emergency	8.105		Emergency management facilities. Provide adequate public facilities . . . to support emergency management, response, and recovery.

respons e			
Public safety and emerge ncy respons e	8.106		Police facilities. Improve and maintain police facilities to allow police personnel to efficiently and effectively respond to public safety needs and serve designated areas.
Public safety and emerge ncy respons e	8.108		Fire facilities. Improve and maintain fire facilities to serve designated land uses, ensure equitable and reliable response, and provide fire and life safety protection that meets or exceeds minimum established service levels.
Public safety and emerge ncy respons e	8.110		Community preparedness. Ensure community preparedness and capacity to prevent, withstand, and recover from emergencies and natural disasters through land use decisions and public facility investments.
Public safety and emerge ncy respons e	8.111		Continuity of operations. Maintain and enhance the City's ability to withstand and recover from natural disasters and human-made disruptions in order to minimize disruptions to public services.
Supporti ng Docume nts and Maps, Public Facilitie s Plans		Citywide Systems Plan, "2035 Comprehen sive Plan Citywide Systems Plan, June 2016" a support document to the Comprehe	The update of the 1989 Public Facilities Plan, to address changes such as: <ul style="list-style-type: none"> • City and metropolitan area growth • Aging infrastructure • Service deficiencies • New growth focus on centers and corridors Purposes and objectives include: <ul style="list-style-type: none"> • Serve new residential and employment growth • Meet long-term infrastructure needs • Provide recommended policies and list of significant projects for the Plan

		<p>nsive Plan, guides infrastructure investments to meet the needs of current and future Portlanders</p>	
			<p>"[E]xisting ... water, sewer, stormwater ... systems will serve the majority of current and new residents and businesses' needs over the coming decades, resulting in additional demands on existing infrastructure. The City has a large infrastructure maintenance deficit due largely to the age of many systems, chronic underinvestment in preventative maintenance and capital repair, increasing maintenance costs, and the lack of revenue to allow more sustainable investment. At current funding levels, some of Portland's infrastructure will continue to deteriorate." (pp. 13-14.)</p>
			<p>"[T]he ability of the City's infrastructure to accommodate growth depends primarily on the City's ability to resolve current deficiencies. . . Major development efforts . . . can overstretch the ability of existing built and natural infrastructure to meet community demands." (p. 14)</p>
			<p>City infrastructure bureaus estimate that the City "needs to invest approximately \$287 million more than current funding levels per year for each of the next 10 years to replace existing aging assets, maintain existing facilities . . and/or meet service levels. . . . This gap will likely grow for each of the next 10 years." (p. 15.)</p>
			<p>As of 2016 over 80% of the combined and sanitary pipes are in good or very good condition. However, "projected investments are not keeping pace with the rapidly aging collection system. . . . 69% combined sewer system pipes are in good to very good condition, but approximately 10% of pipes are at high risk of failure . . ."(p. 100-101)</p>

			"The pumping and treatment systems require regular and more frequent capital investment. While pipes have an estimated 100-year useful life, mechanical and electrical components have a useful life that ranges from 20 to 50 years." (p. 101)
			The combined sewer system and the sanitary sewer system " have hydraulic and condition deficiencies that impact the ability of these systems to serve existing properties at designated service levels. . . Pipe segments that are in poor structural condition are widely distributed throughout the service area with the exception of outer east Portland where the collection system is relatively new." (p. 102)
			In 2013, sanitary and stormwater systems had an estimated annual capital maintenance funding gap of \$12.4 million. (p. 102)
			"Most of the stormwater pipes and sumps in Portland have been in place for decades and were sized with assumptions about climate and land use that were appropriate at they time they were built." Climate change impacts could exacerbate stormwater runoff, increase erosion and sediment in run-off, increase combined sewer overflows, and increase water temperatures. (p. 104)
			Portland's sewer and stormwater rates "are high by regional and national standards. . . Continued public acceptance of rate increases is essential to meeting level of service standards and will require open and clear dialog with the public and decision makers." (p. 105)
			"Per capita water use for single-family residential customers has gone down significantly since 1992 . . . while per capita water demands will continue to decline somewhat over time, the overall demands on the Portland water system will increase due to population growth." (p. 168)
List of Significant Projects	List of Significant Projects, December 2018		"The List of Significant Projects includes significant sanitary sewer, stormwater management, water, and transportation projects necessary to support the land uses designated in the Comprehensive Plan." (p. LP-1) Adoption of Residential Infill Project plan, code and map amendments will require updating this part of the Plan.
Supporting	"Comprehensive Plan		"Density reductions have been proposed in locations farther from identified Centers and Corridors, particularly

<p>Documents and Maps, Growth Scenarios Report</p>		<p>Update, Growth Scenarios Report, July 2015”</p>	<p>in outer East Portland." (p. 6) Down-designations from R5 to R7 in the Proposed Plan have slightly reduced the supply of more affordable small lot single family development." (p. 52)</p> <p>Where are the findings to justify <u>down-zoning</u>, in light of the Project focus on <u>up-zoning</u> existing small lot single family development in much of the east side of Portland? Where is an analysis of the trade-off? Would the Project proposal change if outer east neighborhood lots were not down-zoned? How? Are there Centers and Corridors in outer east Portland where higher density housing and <u>up-zoning</u> is desirable?</p>
		<p>July 2015 Growth Scenarios Report</p>	<p>The Plan estimates Portland's residential capacity at 267,000 dwelling units, more than twice Metro's 2035 housing growth forecast of 123,000 households for Portland. . . "70% of this capacity is in mixed-use corridors and neighborhood centers . . .Other areas with high growth capacity [include] the Lents Town Center and some parts of East Portland."</p> <p>This doesn't appear consistent with the down-zoning of lots in east Portland that is proposed in this Project.</p> <p>"About 11% of the development capacity is in land available for single-family dwelling residential development. . Portland's predominantly single family residential neighborhoods will see limited new housing development and will remain single-family residential neighborhoods." (emphasis added)(p. 17)</p> <p>How is the Project's proposal consistent with these facts?</p>
<p>Supporting Documents and Maps, Buildable Lands Inventory, Buildabl</p>		<p>Buildable Lands Inventory and GIS Model Document</p>	<p>Appendix 1: BLI Model Assumptions, Table 1: Comprehensive Plan and Capacity Assumptions Single Dwelling Zone FAR(Floor Area Ratio) N/A (not applicable)</p>

e Lands Inventor y Docume nts			
Chapter 5 Housing , Middle Housing	5.6		“...Where appropriate, apply zoning that would allow this within a quarter mile of designated centers, corridors with frequent service transit, high capacity transit stations, and within the Inner Ring around the Central City.”
Chapter 5 Housing , Impact Analysis	5.12		Evaluate plans and investments, significant new infrastructure, and significant new development to identify potential disparate impacts on housing choice, access, and affordability for protected classes and low-income households. Identify and implement strategies to mitigate the anticipated impacts
Chapter 5 Housing , Higher- density housing	5.23		Locate higher-density housing, including units that are affordable and accessible, in and around centers to take advantage of the access to active transportation, jobs, open spaces, schools, and various services and amenities
Chapter 5 Housing , Housing preserva tion	5.25		Preserve and produce affordable housing to meet needs that are not met by the private market by coordinating plans and investments with housing providers and organizations.
Chapter 5 Housing , Housing Stability	5.13		Coordinate plans and investments with programs that prevent avoidable, involuntary evictions and foreclosures.
Chapter 10: Land Use Designa tions What is this			The goals and policies in this chapter convey the City’s intent to: <input checked="" type="checkbox"/> Provide a clear definition of each land use designation. <input checked="" type="checkbox"/> Provide guidance for how to update the Zoning Map and Zoning Code.

chapter about			
Chapter 10: Land Use Designations, Land Use designations, Single Dwelling Residential, 3. Single-Dwelling -20,000	10.1		The maximum density is generally 2.2 units per acre. The corresponding zone is R20
Chapter 10: Land Use Designations Land Use designations, Single Dwelling Residential, 4. Single-Dwelling – 10,000	10.1		The maximum density is generally 4.4 units per acre. (9,900 sq.ft/unit). The corresponding zone is R10.
Chapter 10: Land Use Designations, Land Use designations,	10.1		This designation may also be applied in areas where urban public services are available or planned, but the development pattern is already predominantly built-out at 5 to 6 units per acre.(7,920 sq.ft/unit) Single-dwelling residential will be the primary use. The maximum density is generally 6.2 units per acre. The corresponding zone is R7.

<p>Single Dwelling Residential, 5. Single-Dwelling – 7,000</p>			
<p>Chapter 10: Land Use Designations, Land Use designations, Single Dwelling Residential, 6. Single-Dwelling – 5,000</p>	<p>10.1</p>		<p>It is intended for areas where urban public services, generally including complete local street networks and access to frequent transit, are available or planned. Areas within this designation generally have few or very minor development constraints. Single-dwelling residential will be the primary use. The maximum density is generally 8.7 units per acre. (5,007 sq.ft/unit)The corresponding zone is R5.</p>
<p>Chapter 10: Land Use Designations, Land Use designations, Single Dwelling Residential, 7. Single-Dwelling – 2,500</p>	<p>10.1</p>		<p>This designation allows a mix of housing types that are single-dwelling in character. This designation is intended for areas near, in, and along centers and corridors, near transit station areas, where urban public services, generally including complete local street networks and access to frequent transit, are available or planned. Areas within this designation generally do not have development constraints. This designation often serves as a transition between mixed use or multi-dwelling designations and lower density single dwelling designations. The maximum density is generally 17.4 units per acre. (2,489 sq.ft/unit) The corresponding zone is R2.5</p>
<p>Chapter 10: Land Use Designations</p>	<p>10.1</p>		<p>This designation is intended for areas near, in, and along centers and corridors where urban public services, generally including complete local street networks and access to frequent transit, are available or planned. Areas within this designation generally do not have development constraints and may include larger development sites. The maximum density is generally 14.5 units per acre(3,004 sq.</p>

<p>tions, Land Use designat ions, Multi- Dwelling Resident ial, 8. Multi- Dwelling -3,000</p>			<p>ft./unit), but may go up to 21 units per acre(2,071 sq.ft./unit) in some situations. The corresponding zone is R3.</p>
<p>Chapter 10: Land Use Designa tions, Land Use designat ions, Multi- Dwelling Resident ial, 9. Multi- Dwelling -2,000</p>	<p>10.1</p>		<p>This designation is intended for areas near, in, and along centers and corridors and transit station areas, where urban public services, generally including complete local street networks and access to frequent transit, are available or planned. Areas within this designation generally do not have development constraints. The maximum density is generally 21.8 units per acre(1,998 sq.ft./unit), but may be as much as 32 units per acre (1,361 sq.ft./unit) in some situations. The corresponding zone is R2.</p>
<p>Chapter 10: Land Use Designa tions, Land Use designat ions, Multi- Dwelling Resident ial, 10. Multi-</p>	<p>10.1</p>		<p>The scale of development is intended to reflect the allowed densities while being compatible with nearby single-dwelling residential. The designation is intended for areas near, in, and along centers and corridors, and transit station areas, where urban public services, generally including complete local street networks and access to frequent transit, are available or planned. Areas within this designation generally do not have development constraints. The maximum density is generally 43 units per acre (1,013 sq.ft./unit), but may be as much as 65 units per acre (670 sq.ft./unit) in some situations. The corresponding zone is R1</p>

Dwelling -1,000			
Chapter 10: Land Use Designations, Land Use designations, Multi-Dwelling Residential, 11. High Density Multi-Dwelling -	10.1		<p>This designation is intended for the Central City, Gateway Regional Center, Town Centers, and transit station areas where a residential focus is desired and urban public services including access to high-capacity transit, very frequent bus service, or streetcar service are available or planned. This designation is intended to allow high-density multi-dwelling structures at an urban scale. Maximum density is based on a floor-area-ratio, not on a unit-per-square-foot basis. Densities will range from 80 to 125 units per acre (544.5 sq ft/unit to 346 sq.ft/unit)). The corresponding zone is RH.</p>

Tamara DeRidder

#103514 | March 10, 2020

Testimony to **Portland City Council** on the **Residential Infill Project, Recommended Draft**

See attached documents.

Testimony is presented without formatting.

190093



teresa mcgrath

#103515 | March 10, 2020

Testimony to **Portland City Council** on the **Residential Infill Project, Recommended Draft**

hi, this sellwood home included in this attachment is a perfect example of rip, proposals that will further erode portland's affordability... the 19 unit loophole re - affordability is blatant, and is wrong... the threshold for affordability is 20 units, so what gives?? why continue to embrace rip like development, that counteracts portland's green goal? the photo shows 8002 se 13th sellwood, or from the post, but we think it's actually 8012 se 13th... the developers frequently receive sweetheart deals that go against the affordability crisis we have today, and for decades in the past... rip will only make it worse.... why should we be ashamed to have a yard, or a place for children to play, with pets? please rip up the rip plan, put it to a vote, or enact a demolition moratorium.... if developers really wanted to help portland, they would have been enthused to build real affordable housing all these decades... didn't razing ne neighborhoods in the 1950's/1960's/1970's thru urban renewal teach city hall anything? 30% mfi is real affordable housing... portland can do better... for yrs, demolitions have allowed lead/asbestos into the landfill... that is a total waste! the loss of green spaces, trees, and foliage counteracts our green principals... thx for your time, and remove rip, as portland's history is at stake...

Testimony is presented without formatting.

Chemynne Perlingieri

#103516 | March 10, 2020

Testimony to **Portland City Council** on the **Residential Infill Project, Recommended Draft**

I oppose RIP. I have been a low to lower-mid level income renter in Portland for the last over a decade. I have two college degrees. I was caught several times as a single mom with my daughter during massive rent hikes and no-fault evictions only just a few years back. One of those times I was forced to leave my apartment, I had no home with my daughter, and were it not for the help of friends, we would've been living in my car. I relied on some key advocacy during that time from Chloe and others, to prevent further my own displacement by greedy landlords and developers. I fought for renters rights, rent control, and nearly everything else in this city which protects the citizens who live here. Living in inner Southeast since 2009 I have seen almost every small business go out of business as Division street and other areas have been demolished and over-developed to welcome higher income, generally white individuals to move in. It's the diversity in fact of this neighborhood which has made it such a great neighborhood and it's sad to see that disappearing on a daily basis. I am now a homeowner here, and while grateful for the security that that offers, it hurts my heart to see my brothers and sisters struggling on the streets every day, and barely making their rents or without homes to live in. Kids are living in cars. THIS IS NOT COOL. Homelessness has risen in our neighborhood significantly, most heavily affecting elderly, disabled, and many other people without the benefits of any kind of safety net. I really wonder when the city is going to start creating infrastructure for the 20,000 homeless people here, and stop focusing on further development which will make that situation worse. Does Portland want to rise to be the great city we hope it to be? Or continue on the path of so many other huge cities which have turned their backs on their communities??? Seems we have a solid 2035 plan already initiated for infill and density of specific areas. I see no reason to put through yet ANOTHER INITIATIVE which will open the door wider for big development to come in and teardown single-family homes. This is happening on nearly every block around me currently. While I do see some duplexes and smaller apartment complexes going up that aren't as horrible as what is happening on Division, I still don't see that these are affordable rents for most individuals still living in these neighborhoods. Frankly I'm getting tired of seeing my city demolished, when we have the funding and capabilities to do so much more careful infill. In the Netherlands for instance, you never see people living on the streets. Are we looking to be the next San Francisco? Where only the wealthy can live and work here? I believe you have the budget and intelligence to make different choices. I want to see my house taxes used more effectively for instance. Start working on affordable housing for all and creating greener, community homes and apartments which support the diversity of our city rather than divide it. I

voted for you Chloe and JoAnn....and am relying on you and other city officials to do the right thing, and fight for the rights of the people of this city, rather than serve the interests of the developers

Testimony is presented without formatting.

teresa mcgrath

#103518 | March 10, 2020

Testimony to **Portland City Council** on the **Residential Infill Project, Recommended Draft**

OPPOSE RIP- sent in other testimony and forgot to put oppose rip...we oppose rip for numerous reasons, but mostly it displaces hard working people struggling with 2 jobs just to survive...why tear down a house for \$300,000 and build a replacement house that costs \$800,000?...the lack of logic here is appalling....portland used to be green, loved its trees, enjoyed yards for children and pets.....the reality is urban renewal, aka displacing folks who have lived here for decades.....why?...it's the '60's all over again....many speculators and investors have bought up west coast cities including portland....also portland allows apts to be built without parking, while at least 16, 000 units sit empty via the data....why? ...it's sad when the zoning of rip tears up our vintage and affordable homes that erases history....many tourists visit for the historical aspect in our city, and now they don't even recognize it....bulldozing lead and asbestos is wrong, then depositing it in the landfill...isn't our air compromised enough?...why don't you offer programs that allow folks to stay in their homes, with the earmarked \$ for homelessness ?...it beats erecting soulless and cheap buildings with materials that won't last very long....we see many remodels of new buildings just a few yrs later with materials that leaked, or have other problems....how efficient is that? we could go on and on....thx for your time

Testimony is presented without formatting.

190093



Teresa McGrath

#103523 | March 10, 2020

Testimony to **Portland City Council** on the **Residential Infill Project, Recommended Draft**

this sellwood home is a perfect example of rip, proposals that will further erode portland's affordability... the 19 unit loophole re affordability is blatant, and is wrong... the threshold for affordability is 20 units, so what gives?? why continue to embrace rip like development, that counteracts portland's green goal? "The former Sock Dreams building, currently the oldest on 13th Ave in Sellwood, will be demolished (deconstructed) for a 19-unit apartment building with ground-floor retail."

Testimony is presented without formatting.

Doug Brazil

#103524 | March 10, 2020

Testimony to **Portland City Council** on the **Residential Infill Project, Recommended Draft**

As a resident of Portland for over 70 years, I am opposed to this RIP proposal. I have lived in inner Northeast and Southeast Portland neighborhoods for decades and have seen the growth of Portland as mostly a good thing, since the neighborhoods have retained their architecture and density which is much of the “livability” of the city. The proposal of allowing multifamily units within neighborhoods flies in the face of keeping the personality and scale of Portland. This would most likely force folks out of older less desirable homes to allow developers to drop in higher density, higher priced structures. These folks are generally the ones that need affordable homes and this proposal does not seem to address that issue. Portland is unique in it’s variety of single family dwellings. Let’s keep it that way. Good planning has allowed multifamily structures on major arterials and there is plenty of room left for that kind of development to handle the projected growth. As was said, “Build it and they will come.” That is what will happen with streets already crowded with on-street parking and traffic squeezing into little neighborhoods. We do not need more density in the neighborhoods, we need to retain livability and Portland’s unique neighborhood character. Please let this proposal die and RIP.

Testimony is presented without formatting.

815 Washington Street
Oregon City, Oregon 97045

March 9, 2020

Mayor Ted Wheeler
Commissioner Amanda Fritz
Commissioner Chloe Eudaly
Commissioner Jo Ann Hardesty
City Hall
1221 SW 4th Avenue
Portland, Oregon 97204

RE: Historic Resource Demolition Disincentive amendment

Dear Mayor and Commissioners,

On February 28, 2020, I testified, on behalf of the National Trust for Historic Preservation, in support of the approval of the Portland African American Resources Multiple Property Documentation (MPD) by the Oregon State Advisory Committee on Historic Preservation. The MPD form was approved by the Portland Historic Landmarks Commission in January 2020, and was been approved by the State Advisory Committee on Historic Preservation, before final submission to the National Park Service.

The proposed listing of the Portland African American resources is long overdue. It is a first step in correcting the much needed recognition of the city's African American historic resources. The many proposals of the RIP are the biggest threat to recognition of these neglected resources. These resources are the first ones to be torn down. This amendment would help prevent any additional contributing resources in these conservation districts from being demolished before the completion of this collective MPD effort.

You do not need to seek further advice and input from developers, but really need to seek input from the vulnerable neighborhood residents who are primarily people of

color (in North/Northeast Portland) and would be adversely affected physically, and emotionally. The proposal strengthens protections for resources in conservation districts which are not subject to demolition review.

Thank you for the opportunity to provide input on this issue, which is critical to the African American community in Portland.

Sincerely,

Denyse C. McGriff

Denyse C. McGriff, Advisor- State of Oregon
National Trust for Historic Preservation

Denyse McGriff first person of color on Oregon City Commission

[Print](#)

 Raymond Rendleman  Thursday, March 07, 2019

Elected officials vote 3-1 to appoint former city employee, Planning Commission chair

Denyse McGriff will become the first person of color to serve on the Oregon City Commission with her appointment March 6.

McGriff, who will be sworn into office March 20, was among nine applicants for the position that Nancy Ide vacated Jan. 18. Retired in 2013, McGriff spent the final 17 years of her career as a senior project manager for the Portland Development Commission.



Denyse McGriff

McGriff may have also been the first person of color to serve as an employee of the city when she took a job as an Oregon City principal planner in 1988, which was the same year that she and her husband moved to the first city incorporated west of the Rockies in 1844.

"Because of my employment with the city we broke a little ground there, and this is another step in getting our community to be seen how it should be seen," McGriff said. "Becoming a city commissioner is an honor, and I take the responsibility very seriously. It's about communicating, being honest with people and hiding nothing."

Oregon City Commissioner Rachel Lyles Smith encouraged more women to run for City Commission in 2020 and apply to the city's advisory boards and commissions. She said McGriff stood out from the other applicants as having lived in the city the longest, all the while serving on various key city advisory committees.

"I voted for the person most qualified, experienced, professional and ready to step into the position," Lyles Smith said.

Denyse McGriff

#103525 | March 10, 2020

Testimony to **Portland City Council** on the **Residential Infill Project, Recommended Draft**

Letter attached.

Testimony is presented without formatting.