



Concordia Neighborhood Association
P.O. Box 11194
Portland, OR 97211

October 15, 2014

Planning & Sustainability Commission
Bureau of Planning and Sustainability
1900 SW 4th Avenue, Suite 7100
Portland, OR 97201-5380

Re: Comprehensive Plan Testimony

To Whom It May Concern,

The recent wave of home demolitions in the City of Portland has left many residents scratching their heads and looking for solutions. One concern often expressed is that many of the demolitions are simply to replace a smaller, older, more affordable home with a new, larger, more expensive home. For adjacent neighbors, it is difficult to understand what benefit is being received by anybody but the developer: no additional housing units are being created, so pressure on the Urban Growth Boundary is not reduced. The price of the unit in question is actually sharply increased, so the shortage of affordable housing units is actually made worse. In short, it's hard to see how this trend actually helps the city or the region achieve any of our broader planning goals, aside from raising revenue.

Based on a series of recent discussions, and acknowledging that the wave of home demolitions will not be stopped, it is the position of the Concordia Neighborhood Association's Board that the following solution should be implemented as a part of the Comprehensive Plan update process to ensure that at least some of the demolitions will be followed by projects that do actually contribute towards meeting some of our broader community planning goals:

Within walking distance of Frequent Service transit routes (however the City chooses to define this -- 1/8, 1/4, 1/2 or 1-mile crow-fly or network buffer of frequent service transit routes or stops), there should be a new overlay zone created that allows for a residential property containing up to 5 separate residential housing units in a structure that otherwise conforms to the building envelope and setback provisions of its zoning designation (i.e. in an R5 zone, one main dwelling structure per each 5,000 sq ft lot, with required front, side and rear setbacks). The intended purpose of this overlay would be to allow for new residential structures to be constructed containing a number of "flats," i.e. 2-4 story residential structures that look like houses where each floor is a separate housing unit (or a variation where each floor has two units, one on the right and one on the left). This type of structure is the workhorse backbone residential product of places like San Francisco's Mission District, certain areas of Boston, London, and other successful world cities; indeed, Portland has examples of this type of structure in inner SE and the NW Alphabet District that were built in the late 19th and early 20th century.

The end result would be that, rather than a demolition to replace a \$250,000 home with a \$700,000 home, the replacement unit could potentially contain three flats averaging \$250,000 each. One affordable unit could thus be replaced by three affordable units, which would help to achieve goals for increasing the supply of affordable housing, and also reduce pressure on the Urban Growth Boundary. The overall cost would be somewhat higher, due to the need to provide additional kitchens, bathrooms, laundry and

common facilities, in addition to the additional impact fees that the City would likely require. However, the price per unit would be significantly lower for the finished product.

We would propose that, because this overlay zone would only exist within areas served by high quality transit service, that automobile parking requirements should remain the same as if the structure were a single-family home; but that off-street parking should be provided for bicycles at a rate of a minimum of one secure off-street bicycle parking space per bedroom.

It's possible that some neighborhoods would not want to see this type of unit constructed within their boundaries; as such, perhaps this overlay zone is something that could be rejected within its boundaries by a vote of the board of a neighborhood association. That would allow neighborhoods such as Concordia to allow this type of development in the appropriate areas near high quality transit, while neighborhoods like Laurelhurst and Eastmoreland could vote to reject it in favor of preserving their historic single-family character.

While we would love to find ways to slow down the wave of home demolitions, this proposal would allow us to live with the demolitions with the peace of mind that the replacement structures are at least helping us to achieve our broader community planning goals, bringing in more residents to help support neighborhood businesses, providing for more affordable housing, and reducing pressure on the Urban Growth Boundary.

We recommend that this proposal be studied and that language to implement it be developed and included as a part of this Comprehensive Plan Update process.

Thank you.

A stylized, handwritten signature in black ink, appearing to read 'DGE'.

Daniel Greenstadt
Chair
Concordia Neighborhood Association