## **Portland Neighbors for Sustainable Development**

1823 SE 33rd Avenue, Portland, OR 97214

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Planning and Sustainability Commission 1900 SW Fourth Ave., Suite 7100 Portland OR 97201

Chair Baugh and Commissioners:

Portland Neighbors for Sustainable Development is a group of concerned Portlanders from neighborhoods around the city. We believe the 2035 Comprehensive Plan Proposed Draft is generally headed in the right direction.

Support Town Centers

1. We support the Urban Design Framework, and the hierarchy of Central City, Regional Center, Town Centers and Neighborhood Centers. Concentrating growth in these centers and along transit corridors will reduce auto travel and Greenhouse Gas emissions, put more services within walking distance of more people, and make our city a better place to live.

We support all the designations, especially the new Belmont/Hawthorne/Division Town Center. The three streets included function as one center, with residents accessing services and shopping on all three. The Center designation, as well as the mapping, recognize the way this area functions now and supports a coordinated planning and development effort going forward.

Rewrite Mixed Use with goals in mind

2. We applaud the Mixed Use Zones Project as a necessary effort to rewrite the Commercial zones to acknowledge their mixed use function. We are, however, concerned that initial concepts put forward reduce the capacity of the zones. Specifically, we fear that proposed stepbacks and height limits may suppress development of new buildings in these zones and yield fewer and more expensive residences there. This will reinforce the housing shortage that is driving rents up in Portland. We urge the city to preserve existing entitlements, and use increases in height or FAR to incent community benefits such as affordable housing, in order to maximize housing choices in strategic Centers locations.

Preserve and increase housing opportunities

3. We support preserving the housing capacity in existing zoning. While the proposed zoning can theoretically provide the necessary housing unit increase, developers will build mostly in sought-after neighborhoods, leaving capacity unbuilt in other places. So, excess capacity is necessary to achieve Comp Plan goals.

We oppose downzoning of close-in, transit-served areas such as proposed in NE Portland, from Williams to King, Schuyler to Fremont. We support modifying single-family zones to further

support ADUs, and allowing additional units within existing homes, as long as exterior appearances are preserved.

Portland is growing in ways that reduce VMT and create complete neighborhoods. But to meet the Climate Action Plan goals for emissions and VMT reductions, and build the city envisioned in the Comprehensive Plan, a stronger emphasis on building a compact city is necessary. We hope the Planning and Sustainability Commission takes the lead to ensure this happens.

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