

**From:** Peter Kozdon [mailto:peter@kozdon.net]  
**Sent:** Tuesday, August 02, 2016 12:03 PM  
**To:** Planning and Sustainability Commission <psc@portlandoregon.gov>  
**Subject:** CC2035 Plan Testimony

Submitted by: Peter Kozdon, 2211 SW 1<sup>st</sup> Ave Unit 402, Portland, OR 97201 - Aug 2, 2016

I would like to update my earlier submission (July 31, 2016) to include a drawing of the area covered by my comments (the drawing was accidentally omitted earlier).

Revised submission:

I would like to offer the following feedback comments for consideration.

1. Composite Zoning Proposal maps show no changes to the base zoning in the South Downtown / University area. In reality significant increases to FAR (Floor Area to site Ratio) as well as the introduction of Bonus FAR will drastically alter what is allowed.
2. Much of this downtown area is currently covered by a design overlay zone designation, which *"promotes the conservation, enhancement, and continued vitality of areas of the City with special scenic, architectural, or cultural value"*. The proposed increases in FAR plus BONUS allows for major increases in building height.
3. Specifically with regard to properties between SW 1<sup>st</sup> Ave and Naito (for example 2220 SW 1ST AVE) - the proposed FAR (with bonuses) changes the current 2:1 to 12:1 and permitted height increases from current 75 feet to 250 feet. A six fold increase in density would not seem be well aligned with the objectives of the overlay which: *"promotes the conservation, enhancement, and continued vitality of areas of the City with special scenic, architectural, or cultural value"*
4. Affordable Housing Replacement Fund (AHRF) FAR bonus cost is a fixed amount, this is likely to be drastically devalued by 2035 in relation to construction costs and property values. The AHRF (as well as other) FAR bonus costs should be tied some "property value" index.



**Blocks 2000-2399 SW 1 st Ave.**

This CXd area should retain the existing allowable height and FAR restrictions. Increasing the current FAR will have an adverse effect on the character and environment in this mixed residential / commercial neighborhood and would seem to be in conflict with the objectives of a design overlay.



**From:** Peter Kozdon [<mailto:peter@kozdon.net>]  
**Sent:** Sunday, July 31, 2016 6:14 PM  
**To:** 'psc@portlandoregon.gov' <[psc@portlandoregon.gov](mailto:psc@portlandoregon.gov)>  
**Subject:** CC2035 Plan Testimony

Submitted by: Peter Kozdon, 2211 SW 1<sup>st</sup> Ave Unit 402, Portland, OR 97201 - July 31, 2016

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