

# Residential Infill Project

## What We Heard Summary Report

Public Comments on the Discussion Draft  
Zoning Code and Map Amendments

January 2018

### AN UPDATE TO PORTLAND'S SINGLE-DWELLING ZONING RULES



The goal of the Residential Infill Project is to adapt Portland's single-dwelling zoning rules to meet the needs of current and future generations.



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# Introduction

## Project background

In single-dwelling zones, the Residential Infill Project will address the placement and **scale of houses** and home additions. The project will also provide more **housing opportunity** in the form of “middle housing” choices such as ADUs, duplexes, and triplexes on corners that will increase the variety of housing options for Portlanders. Additionally, the project will look at improving **narrow lot development** and make recommendations about where these lots may be appropriate. Visit the website for more information about the project: [portlandoregon.gov/bps/infill](http://portlandoregon.gov/bps/infill).

The Residential Infill Project is being completed in two phases. The concepts for the proposals were developed in Phase I, which took place in 2015 and 2016. Phase II, which began in 2017, includes the Zoning Code and Zoning Map amendments needed to implement the concepts from Phase I.

Input from the public in Phase I was invaluable in developing the proposals in Phase II. Last year, staff developed a Draft Concept Report after working with the community and a Stakeholder Advisory Committee to work through broad ideas and themes related to development in Portland’s single-dwelling zones. During two rounds of public input, staff heard concerns about affordability, loss of neighborhood character, demolition, parking, aesthetics, infrastructure, green space, and other topics (see the [Summary Report of Public Comments Received on the Residential Infill Project Concept Draft Proposal](#) on the project website for more information). This public input was used to revise the draft concepts into proposed concepts for City Council to review. In December 2016, after holding public hearings, City Council passed a resolution directing staff to develop Zoning Code and mapping amendments to implement their concept direction.

The Discussion Draft fleshed out the concepts into Zoning Code and mapping amendments that would implement them, along with a detailed overview of the rationale and impact of the proposed regulations. The public review of the Discussion Draft was from October 3 to November 30, 2017.

## Notification

Notification about the Discussion Draft public review and opportunities to comment occurred through several methods throughout the comment period.

- Blog posts on the Residential Infill Project website, hosted by BPS
- Project e-updates to project mailing list of over 1,200
- Posts by BPS on NextDoor, Facebook and Twitter (several were then shared by others)
- Articles in local newspapers (including the Oregonian, Portland Tribune, Willamette Week, Daily Journal of Commerce, Portland Business Journal, and several neighborhood newspapers)
- Coverage on local TV news stations (KOIN, KATU)

- Via BPS and Bureau of Development (BDS) e-newsletters

## Public engagement and comments received

The public comment period for the Discussion Draft of the Residential Infill Project spanned from its release on October 3 through November 30, 2017. This outreach period focused on informing the public on the Zoning Code and map proposals of Phase II. Staff encouraged people to bring their general concerns or support to the Planning and Sustainability Commission (PSC), which will review the proposals in the spring of 2018. Project staff conducted outreach through a kick-off meeting, a series of six district drop-in office hours, meetings with community organizations, and numerous conversations with groups and individuals.

### *By the numbers*

- **433** people submitted **3,425** comments through the online and paper comment forms
- **249** emails were sent to project staff
- Staff received **46** letters from organizations or groups which included nonprofits and advocacy groups, public-sector agencies and commissions, coalitions of for-profit housing developers, business interests, and neighborhood associations and district coalitions.
- **36** comments from the lobby exhibit in the 1900 Development Services Building

Comments received during the Discussion Draft public review period will inform the Proposed Draft, which is staff's proposal to the Planning and Sustainability Commission (PSC). See "Next Steps" below.

## Report organization

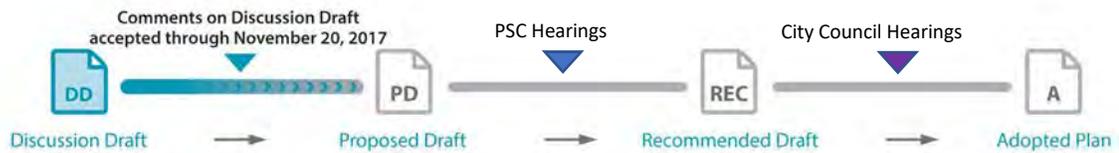
This report documents and summarizes the public comments received via comment forms, both online and on paper; emails; written comments from an exhibit on the first-floor lobby of the Bureau of Planning and Sustainability (BPS) building; and letters from organizations.

This report starts with an overview of what staff heard on several key themes. It then details the comments received for each of the 12 proposals. Finally, the report offers a recap of the letters received from organizations.

## About the comments

The report includes excerpts from comments (shown in italics) to provide the reader a flavor of the feedback received. The comments have been organized and sorted but not all comments are shown. Staff has attempted to represent the full spectrum of opinions and suggestions. Comments have not been edited to correct grammar or spelling, and may contain inaccuracies pertaining to specifics of the project or current city requirements. Readers can find the full text of the letters and all comments received via the comment form, emails, and lobby exhibit in the appendices.

## Next steps



**Proposed Draft:** Based on *Discussion Draft* feedback, a *Proposed Draft* will be published in spring of 2018 for Planning and Sustainability Commission (PSC) consideration. At that time, the public will be invited to submit formal public testimony to the PSC, in writing or in person, at a public hearing(s) tentatively scheduled to begin in May of 2018. The Commission may amend the proposal and will subsequently vote on a specific recommendation to Portland City Council. This is then called the *Recommended Draft*.

**Recommended Draft:** City Council will hold additional public hearing(s) and take formal public testimony on the *Recommended Draft*. The City Council may amend the *Recommended Draft* before they vote to adopt the plan. This will likely occur in the fall of 2018.

## Key Themes

While most comments received spoke specifically to the project proposals, there were several recurring themes described below that spanned several proposals or emerged as more significant or broader in policy impact. These themes included housing affordability, mapping methodology, displacement impacts, visitability requirements, historic preservation issues, and tree preservation.

### Affordability

Much of the commentary related to housing affordability centered on the affordability bonus proposed in the Discussion Draft. Other commenters related affordability to housing supply and the location of the 'a' overlay (see subsection "Mapping the 'a' overlay" below), and others discussed the impacts of parking requirements and the proposals relating to scale and narrow lot development on affordability.

#### ***Concern about the bonus needing to be expanded***

Many commenters thought the affordability bonus unit would not prove workable as currently written. They wanted a bonus unit if one unit was affordable, or wanted more bonus units, or offered other variations on the bonus. Commenters had a range of new ideas, described below.

Allow a bonus unit if one unit is affordable:

- *100% is too burdensome. Even 25% would be higher than the IZ requirements. The bonus should be allowed with a single affordable unit. Not sure anyone will take advantage of this 80% bonus unit. allow an extra unit if ANY 1 unit is 80%. that would get much more uptake, which should be the goal.*
- *I'd love to see the bonus unit apply if just one unit is "affordable" up to 80% MFI.*
- *Why not allow a bonus unit if ANY units are affordable?*
- *This bonus will likely not be sufficient to incentivize affordable units in most cases. The opportunity cost and cost to build are too high. Instead try offering a bonus unit if the bonus unit is affordable. This creates a strong incentive for affordable units and more housing supply instead of a difficult tradeoff.*
- *This is nice, but seems unfeasible. Why not allow a bonus with SOME affordable units, not all? Absolutely I support waiving parking requirements, in fact, get rid of parking requirements all together.*
- *A bonus unit should be allowed if 1 family-sized (2 bedroom minimum) affordable unit is provided. Requiring all units to be affordable will be cost prohibitive and limit private/non-profit partnerships which could do more to integrate affordable and market-rate housing.*

Allow a bonus unit if two units are affordable:

- *It seems like too high a threshold to require all units to be affordable to the up to 80% crowd. Reduce this to at least two, and more private developers would participate in this program.*

Allow a bonus unit if one unit is affordable and two bonus units if one unit is for families earning up to 60% MFI (Median Family Income):

- *One bonus unit should be given for one affordable unit, two bonus units if one is for families under 60% AMI.*

Allow more than one bonus unit:

- *Allow as many affordable bonus units as the building can accommodate before breaking height and setback requirements (not just one)*
- *More bones units should be allowed. I support voluntary affordability bonuses up to 1.0 FAR for R5 and R7 and 1.5 FAR for R2.5. Anything less is a completely inadequate response to the affordable housing crisis.*
- *Let's get this city to be world class before thirty years elapse and thousands more children grow up in poverty: allow five bonus units if all units are permanently affordable units.*
- *Consider a third in the R2.5 zones with 3rd at 60% MFI?*
- *Allow TWO bonus units Give all the waivers needed to add possible missing middle additions of housing units*
- *Could there be a further increase allowing one more small internal ADU for 60% MFI?*
- *Only one bonus unit sounds stingy--why limit the number of affordable units that can be put on a given piece of land to +1 of the total number of planned units? Who is that going to sway?*

Other suggestions looked at financial tools, such as subsidies or payments in lieu:

- *Utilize the \$60-80 million BDS "slush fund" to significantly reduce permit costs for those projects that fall within the affordability spectrum.*
- *A better policy might allow a single below-market-rate unit or a fee-in-lieu at some semi-annually-adjusted amount for the extra unit. This would allow the provision to be exercised when it makes financial sense, and still be available to non-profit developers.*

Some people drew comparisons to the City's Inclusionary Housing policy to illustrate the infeasibility of the proposed affordability bonus:

- *Developers of large 20+ buildings are only required to make 10 to 20% of the building affordable to low income people. But small developers or regular homeowners who don't have the benefit of offsetting low rents with market rents, will be forced to make all units affordable in order to add density?*
- *Why should this be more onerous of a requirement than for 20+ unit multifamily, where site acquisition costs can be spread across so many more units?*

Other people expressed concern for the feasibility of the bonus requirements and offered suggestions to go further with the bonus:

- *Increase affordability bonuses as much as possible.*
- *The affordability constraint seems far too strict.*

- *Your incentive is not even close to reasonable.*
- *Allow additional FAR for family-sized units*
- *Revise the building code to allow 4 unit buildings to be constructed under the residential code.*
- *Why would a builder or homeowner want the risk of complying with the Affordable Housing requirements fo 99 years? The risk tail is out of scale.*
- *We dont need incentives for affordable housing, we need requirements.*
- *I can't say how this will eventually work out, but from what I've seen in terms of current and proposed construction, incentives appear to be an insufficient method for increasing affordable housing.*
- *Incentives contemplated by 405 will not work financially for projects built by CCC or similar nonprofits. Most housing units built or remodel by CCC have been in commercially or multifamily zoned property, and usually have more than 20 plus units.*
- *It'd be nice to allow bonus units for developers who are building less than 100% affordable, maybe by allowing them to accumulate units from multiple sites.*

### ***Concern about the bonus being too permissive***

On the other hand, some commenters thought the proposed bonus was too generous and that affordability requirements should be stricter. Several commenters thought 80 percent median family income (AMI) is not affordable. Some commenters wanted the bonus to only be offered at deeper levels of affordability, ranging from 30 to 60 percent AMI. Here are some examples:

- *Lower from 80 to 30%*
- *I agree but think the affordability bonus should top at at 60% MFI.*
- *need to adjust definition of "affordable" to apply to bonus awards. affordable should be redefined as 50-60% of MFI.*
- *Allowing one bonus unit: Do not agree. It seems like this would just lead to build a lot more studios or one bedroom apartments. I'm not sure this is what "families" need.*
- *Duplexes and triplexes should have an affordability requirement.*
- *We assert an affordable housing mandate should be tied to every multi-unit redevelopment of a lot. If more than two units are planned on a redeveloped lot, one affordable unit should be mandated.*

### ***Scale & setback impacts on affordability***

Several commenters focused on the provisions related to scale of houses and their impacts on affordability.

There was considerable support for provisions to reduce the scale of houses, as observed in prior rounds of public input, with some people making the link between smaller house sizes and affordability during the Discussion Draft phase:

- *smaller is more affordable*
- *approve of allowing any additional adu space -- helps to provide affordable housing*

- *Size of homes need to be small so people who work in Portland can afford to live in Portland. Portland has job sprawl, so increasing density far from the job centers of Beaverton/Hillsboro, Tualatin/Wilsonville and Vancouver is just plain stupid. You need to increase the density of high-paying jobs in urban areas before increasing the density of expensive housing. People increasingly have to work in the suburbs in order to afford to live in the very expensive housing that is being put in Portland right now.*

However, people were concerned that reducing scale would reduce the incentives to build, the diversity of housing types, and/or negatively affect affordability:

- *Drastically reducing the size limit while simultaneously increasing the unit count is counterproductive. You are basically forcing people to only build 1-bedroom units. We need diversity in housing types and should be increasing allowable square footage so people can build a wide range of housing types - including larger 2,3,4-bedroom houses for families or co-housing.*
- *You are making the rules too restrictive. If you really cared about adding housing opportunity you wouldn't be trying to limit size and density. Both of these are handouts to NIMBYs who are afraid of change and don't want other people to move into their neighborhoods. It is terrible policy for the city to take.*
- *I support higher height (and FAR) allowances for all residential zones and would strongly encourage that the city use height as a bonus to incentivize the creation of new affordable housing in residential zones.*
- *Why is Portland REDUCING allowable FAR (from current envelope standards) when we're supposedly in the middle of a housing crisis? A 0.5 FAR on a 5000sf lot is a 2500sf. How does .15 extra FAR get us to an 800sf ADU on top of the 2500sf house? Or even harder, to a triplex with units that are reasonable for families? Reducing effective allowable FAR will ONLY encourage the building of more single family houses and DISCOURAGE ADUs and duplexes. Homes are built and sold based on cost per square foot. If you were a builder and could sell one SFH for \$3/sf but it cost you \$1.50/sf to build, or you could sell a triplex for \$3/sf but it cost you \$2.50/sf to build (because kitchens and baths are expensive), which would you build? You'd build a single family house at 2500sf with no ADU. To understand the implications of this policy, all you need to do is think like a developer and figure out what would be most profitable to build under these rules. Developers want to do the right thing, but not if you back them into a corner.*
- *Additionally, this "a" overlay you propose is much weaker than the current a overlay, which allows up to 1.5 times of the number of units per lot. A .15 addition to FAR is not going to give you the desired outcome. It's not going to be worth it to builders and architects to worsen the curb appeal of a house for the ability to add 750 square feet of expensive square footage. It's diminishing returns. Fewer bathrooms and kitchens = much less expensive to build, and if a project is going to be more expensive with less curb appeal, it probably won't get built. If Portland really wanted to encourage certain building types, it would allow a much more meaningful increase in FAR.*
- *We have a housing emergency. How does this help provide additional housing for Portlanders? Urban FAR should be 1.0 or higher. Stop trying to suburbanize our city.*
- *Allow more FAR specifically to create more housing, included renting and homeownership. Prioritize higher FAR for affordable projects (for those renting/owning at 0-65% MFI)*

- *Please do not limit house size. As the Johnson Economics report explains, such a limit will result in fewer housing units being developed, thereby worsening Portland's housing crisis.*
- *The overlay zone is an okay idea, but it has been applied onto the map in a timid and ineffectual manner. If there is an FAR cap, why bother regulating the number of units? ---particularly if the FAR and height limits and height calculation conventions are so constrained. If housing is a big issue, why proffer such a stunted approach?*
- *You shouldn't limit the size of houses. Allow big houses \*and\* more units. It will allow more building to be actually profitable and therefore encourage supply.*
- *We have a housing shortage. How is limiting the size of homes going to help this? I have a 25x100 lot I planned on building a 1,800 sf house with a detached 800sf adu with the idea of potentially turning the 1,800 sf houses basement into a 600 sf adu. The existing proposal would eliminate this plan and I would end up building a a 1,750 sf house without the adu's. So, the proposed plan would eliminate two desperately needed housing/adu's and decrease desperately needed tax revenue. The taxes on my plan would probably bring the city 12k annually, the proposed plan would bring the city half that. So, for one lot... these proposals would decrease tax revenue and reduce housing supply by two units. Multiply this example by 1,000's (the number of future lots this proposal will impact). Therefore, the stated goals or needs of the city are in no way being encouraged by limiting the size of houses.*
- *I know several millennials who share a four bedroom house to make rent affordable for each of them. I did this myself earlier in my career. I fear that that cap will further limit such sharing in the future if we are not adding to that four bedroom supply because of this 2500 sf limitation.*

Some people thought increased setbacks would decrease housing production and affordability:

- *REMOVE THIS [setback proposal]. This reads like classist, stupid drek which could very much limit overall FAR that could go towards more units and affordability. These sentiments above seem classist and limiting, unless of course you already OWN property in those neighborhoods*
- *Larger front setbacks mean larger front yards (and consequently smaller back yards) and more pressure to keep those spaces landscaped as they are visible from the street, fenced in for animals, etc. This leads to a greater physical/monetary burden for many residents.*
- *not sure increasing set backs will be a net positive in the reach for increased housing/affordability. seems a measure meant to preserve Portland's dominant suburban character.*
- *Please do not increase front setbacks. Again, all these new regulations will just hinder new development and worsen the housing crisis you're supposedly trying to solve. You need to deregulate so that more housing can be built.*
- *It's unnecessary to increase front setbacks -- we should be focusing more on increasing the # of allowable units in residential zones.*
- *Don't increase front setbacks. It makes it harder to squeeze everything in and still preserve trees. Why are you making things more difficult if the goal is more housing?*

One commenter believed scale reductions were exclusionary:

- *Current RIP standards are absurd in that they do not match the far denser character of many of Portland's residential areas. I am categorically opposed to and limits on density because these*

*policies serve to exclude tenants (who are predominantly low-income people and more likely to be marginalized folk or POC). Limiting density to 0.15 FAR in the midst of a housing affordability crisis is exclusionary and regressive in terms of equity. The city should be doing everything in its power to reverse its disastrous legacy of gentrification by encouraging and incentivizing new affordable units without reinforcing discriminatory and racist density requirements.*

Some people thought design requirements would negatively impact housing production and affordability. Here is an example:

- *I do not support limit on stairs or requirements for street-facing facades. These kind of aesthetic/design requirements have a significant impact on housing and affordability and should not be considered in the midst of our affordable housing crisis.*

Some people thought existing larger allowed house sizes would better facilitate internal conversions. Here is an example:

- *Leaving housing sizes as-is facilitates future opportunities for internal conversions, which would help meet Portland's goals for housing affordability, safe transportation choices, and climate change mitigation.*

### ***Parking impacts on affordability***

Many commenters called for eliminating or reducing parking requirements due to their impact on housing costs:

- *Please also reduce rules for parking and garages on all residential lots. If someone doesn't need or want parking, don't make them build parking. Required parking just makes housing more expensive and if housing affordability is more important than car storage, then we shouldn't require car storage.*
- *I would suggest banning personal parking spots and garages so investments can be focused on housing for people, not cars. It doesn't matter if cars are homeless, they'll be fine in rain.*
- *I approve of these [affordability] bonuses, but think that, really, there should be no parking requirements in any single-family zones. Closer to arterials is where the on-street parking crunch is, and there is where the 500' from transit exclusion exists. Further away, there's no shortage of on-street parking.*
- *Forbid parking on narrow lots. Or say if you do not provide parking, you get a bonus unit allowed. We need to house people not cars.*
- *Take city should live up to its commitments to housing affordability, environmental sustainability, and transportation equity by eliminating all requirements for parking and/or garages in residential zones.*
- *I am in favor of waving any parking requirements. Having parking minimums undermines our ability to meet affordable housing needs as well as build for a future that is not dependent on personal cars.*
- *Portland's current parking requirements outside of areas served by frequent transit is ridiculous. No SFH should be required to have off-street parking as the driveway pre-empts at least one on-*

*street public parking space. If the home has an adjacent alley, a garage should be allowed but not required on the alley.*

- *There should be no parking requirements at all in the overlay zone.*

A couple commenters did not support tuck-under parking because it costs more. Here is an example:

- *If parking isn't required, then I might support this. The parking requirement is stifling to development. That said, if someone is going to build a garage, then it seems arbitrary to force it to be below grade. That just increases the cost to build and thus, the overall cost of housing.*

### ***Narrow lots as affordable options***

Some commenters opposed the limitations on narrow lot development for hindering housing affordability. Several commenters supported narrow lot development and wanted expanded options for developing them:

- *Again, don't limit development on narrow lots so much. Research shows these can be some of the most affordable houses out there. Embrace them!*
- *From Appendix F: "Benefits include additional housing opportunities, including fee-simple and potentially lower cost homeownership options, and drawbacks include neighborhood concerns about architectural compatibility with existing patterns and unexpected degrees of density based on the zone." I believe the benefits FAR outweigh the drawbacks. Most potential new homeowners NEED less expensive options. Rezone ALL narrow lots to R2.5 and expand the number of what were once called "Permit Ready" house designs--getting rid of the one's with garages and driveways. There are dozens and dozens of narrow lot designs on the web that would be an asset to any neighborhood.*
- *With only 6.5% of the city zoned R2.5 it seems this could help increase opportunities.*
- *Please find a way to allow development on historically-narrow lots, at least if the alternative is for the lot to house nobody.*
- *Allow development on ALL narrow lots, regardless of how long they have existed or what the minimum is. The proposed dimensions of 3000 sq ft and 36 feet wide completely ignore not just plentiful housing opportunities, but ones SUPPORTED BY Oregon state:  
<http://www.oregon.gov/LCD/TGM/docs/House%20Plans%20for%20Narrow%20and%20Small%20Lots.pdf> ^^this document was produced in June of 1997. If ONLY we used such beautiful designs and encouraged narrow lots 20 years ago. We have an opportunity for this NOW. Allow ALL narrow lots to be developed, and allow mid and small developers to create interesting, dense, missing-middle housing that will help with renters and homeownership possibilities. Also, utilizing a community land trust for such lots, especially in Cully and St Johns, is the best way I feel to prevent displacement of immigrants and ethnic minority populations.*

## Mapping the new 'a' additional housing opportunity overlay

During public outreach on the draft concepts, many supported the new 'a' overlay and encouraged it to be applied more broadly, while many others opposed the new 'a' overlay or wanted it applied to a smaller area. The comments shown below reflect these divided views.

Many commenters wanted the 'a' to be applied everywhere, relating it to added housing production and housing affordability. (Also, see the comments related to "Displacement" for more.)

- *The new 'a' overlay zone will add more housing options to the city, improving housing opportunity and affordability. Therefore, it is not necessary to limit the 'a' overlay to certain neighborhoods. The new 'a' overlay should apply to all residential zones currently zoned for single-family housing. In most cities, is housing typically more affordable in neighborhoods with more housing or less housing?*
- *This ['a' overlay] is way too restrictive; allow more housing to be built please so more people can live in our city more affordably*
- *I think you should allow these housing types in every single family neighborhood, not just in an overlay.*
- *we should allow 4-plexes on corner lots and triplexes on every property. Who cares how many units are on a property? We shouldn't be mandating unit counts but rather mandating safe construction.*
- *Please apply the new 'a' overlay to all single-family dwelling zones.*
- *More of the above housing is needed. Missing middle housing should and must constitute the majority of new construction throughout ALL of Portland in the coming years, that means BEYOND the West Hills, on Hayden Island, beyond I-205 to the east and beyond Division to the south. WE NEED MORE MISSING MIDDLE HOUSING IN EVERY SINGLE ZIP CODE IN METRO*
- *I'd push back on limiting the R.I.P. to just the overlay zones rather than city-wide. Housing pressure relief methods need to address housing needs at all levels of income. In theory the result of the R.I.P. will be more accessible housing. This is needed everywhere.*
- *Allow the "housing opportunity" provisions in all areas of the city to improve equity outcomes and encourage the creation of additional walking scale neighborhoods.*
- *I support the new "a" overlay zone in all areas of the city as proposed in the current discussion draft. I don't think it's fair to exclude East Portland from the opportunity to increase their density so they may have the density/population to support amenity rich/walkable/20-minute neighborhoods like so many of the inner areas have currently.*
- *This should apply to as much of the city as possible; it's simply not fair that rich, historically exclusionary areas like Laurelhurst and Eastmoreland don't have to include their fair share of new housing.*
- *These features should be folded into the base zone.*
- *I worry that if we exclude neighborhoods like Cully with large lots which could accept additional density (thereby making our neighborhood more lively, support local business, and provide increased transit ridership) will do more harm than good in our neighborhood. Our street grid is less connected than other neighborhoods so increasing density, providing more small housing options, and increasing transit access are great ways to support opportunities for our low-income neighbors.*

- *We also have a large number of extended families in our neighborhood and these friends and neighbors would benefit from many of the provisions of the opportunity zone.*

Other commenters wanted the 'a' to be applied citywide for concern about code complexity or for the sake of simplicity:

- *I worry that we are making the zoning code more and more complicated, with overlay zones that have special rules. Why not allow this in all R-7, R-5 & R-2.5 zones?*
- *These seem good. Why not just include the 'a' overlay allowances in the base zoning since the map shows that they already cover most of the city?*
- *The Housing Opportunity proposals fundamentally redefine what it means to live in a single-family zone. If that is your intent, please simply change the meaning of the underlying zones rather than rely on the overlay mechanism, and extend the provisions citywide.*

Some comments questioned the adequacy of available services, or the methodology applied to remove constraints:

- *there are concerns that the City's infrastructure cannot handle the increased density of the proposed overlay zone. The BPS staff should clearly document how the overlay will not overburden the City's water, sewer, road, fire safety, and private utility systems.*
- *there is spatial variability in the risk of a given hazard: floods happen in floodplains and earthquake risk is greater in some areas than others. This spatial variability should be considered and used to avoid placing additional density in extremely hazardous areas such as a 100-year floodplain or active landslide zone.*

Some did not support disallowing the 'a' overlay provisions based on infrastructure issues:

- *Allow 'a' overlay provisions for properties on unimproved streets.*
- *infrastructure should not be a reason to exclude, just need to be strategic (and use SDCs for needed improvements in those areas).*

Others, who wanted the overlay to contract, offered specific suggestions about the mapping methodology:

- *Scale the 1/4 mile down to 1/8 mile and not along the corridors. We need to keep some residential neighborhoods. We need to work more with the 2035 comprehensive plan. The main development needs to be around the city centers making these walkable.*
- *1-4 mile on each side of the corridor in the inner SE (Burnside/Stark/Belmont/Hawthorne/Division) comprises (almost) the entire area - it does not provide "corridors" of zoning, it just upzones the entire area. This is not acceptable, nor is it in the spirit of the stated purpose of the overlay zone. 500' is a maximum I could find acceptable.*
- *I agree with the concept, but believe that 1/4-mile is too large. I think it should be constrained to 300 feet.*
- *I strongly, vehemently disagree with the 1/4 mile distance to centers/corridors, etc. A 200 foot distance is best, with 400 feet a compromise.*
- *Limit the "a" overlay to areas within 300 feet of current TriMet frequent service lines so that there is a real relationship of efficient and reliable transit availability for persons who reside in these new housing models.*

- Proceed with a "test" HOOZ zone of 1/10 of a mile at centers and corridors. Look at this area to be rezoned R-1 to truly provide middle housing where it belongs.
- Concerning 33.405.040 Ineligible Sites & Step 3: Constraints. It is good that you recognized certain lots/streets should be exempt. However a dead end street that does not meet Fire Code or the Right-of-Way Code should also be exempt. Streets without adequate fire apparatus turnaround and/or do not meet provisions found in 33.654.110.B:2 pertaining to dead end streets and 33.654.120.C:3 pertaining to turnarounds on dead end streets should be considered ineligible sites. This is basic public safety. Dead End streets are always treated differently in the code because they could trap people in the event of a fire or gas explosion. If the street does not meet code standards for dead end streets, more people should not be added to create evacuation issues during public safety events.
- If grocery stores and other services are not within ¼ mile, one parking space must be provided for each living unit, including accessory dwelling units.

On the other hand, some people offered suggestions to the methodology that made it more expansive:

- The radius around MAX stations should be increased to 1 mile, which is within the walking tolerance of many people. (see, e.g., <https://www.citylab.com/solutions/2015/01/what-does-living-close-to-transit-really-mean/384421/>)
- When done, this will likely mostly concentrate housing in inner east Portland. That is fine, but I think we can find more creative ways to expand this. One problem we have with outer east Portland is that there already isn't great infrastructure, and so tying this policy to infrastructure inherently omits significant parts of EP. For example, we tie this to public transit, and yet that is woefully underserved in EP. So, what if we got creative and tied it to the low-income fair so that missing middle housing could be built in those areas. Transit and housing can be a chicken/egg situation, so let's be ahead of it. Build the housing and we'll push Trimet to serve better.
- The idea of the 1/4 mile walk standard is very common in transit planning, but in practice, people are generally willing to walk slightly farther for higher-quality services; in this case, MAX stations and Frequent bus services. the new 'a' overlay should be extended to 1/3 or 1/2 mile from MAX stations and along Frequent bus lines.
- Some areas need additional infrastructure, like sidewalks and better transit. But by not extending the "a" overlay, you are consigning them to limbo, and then the city will later be shoe-horning in the types of housing we are talking about now and wishing it had allowed these originally. And, improved transit service is a chicken-and-egg problem.
- East Portland lacks frequent transit service lines. It should be included in increased density so that the housing stock can continue to grow and remain affordable as supply increases. There needs to be some sort of carve out for east Portland otherwise the cycle of low-density, infrequent transit, increasing housing prices, and diminished biking/walking infrastructure will continue.
- Have this 'a' overlay zone apply to R7, R5 and R2.5 property created from R10 and larger properties that are the result of land divisions in areas where the 'a' overlay applies to these zoning designations.

Some also noted the dynamic nature of city conditions and wondered how this might affect the map in relation to future circumstances:

- *Question - will the map be dynamic? I believe it should be, in that any time 15-minute bus service changes, the map changes as well, instead of waiting for new action from council.*
- *in the coming years, TriMet will begin operating a bus rapid transit ("BRT") line with designs meant to increase reliability and predictability through greater stop spacing and signal prioritization. This line will be on SE Division. I would argue that instead of treating this line as frequent service (which it is), it should be treated as MAX service and greater density should be allowed within ¼ mi (or more) from BRT stations*
- *Much, if not all, of the excluded area [east of NE 42nd Avenue between NE Killingsworth and NE Portland Highway] is zoned R10 with an R5 comp plan overlay. This means that the property can be subdivided into R5 lots. However, in the current 'a' overlay plan, there is no contingency for dealing with R5 property resulting from such land divisions... We believe--and recommend--that at this issue be address by specifying that all R5 properties resulting from land divisions within this non-'a' overlay area, automatically be included in the 'a' overly so as to be consistent with the other R5 properties in this area that are included in the 'a' overlay.*
- *the Overlay Zone should eventually apply throughout the City. The BPS Staff concerns about gentrification potential and equity are valid, but the underlying data has not been provided to the public, particularly renter and owner occupied properties based on race and income. These are dynamic measures that will change each year, so a FIVE year review of any excluded areas is appropriate.*

## Displacement risk analysis

City policy, embodied in the 2035 Comprehensive Plan, expresses the importance of applying an equity lens when creating plans and policies to avoid negative consequences of land use changes – particularly displacement – on under-served and under-represented communities. To meet this goal, staff conducted a displacement risk analysis that looked citywide at the relationship between *areas of opportunity* (places with good transportation connections and proximity to amenities and services that people need in their daily lives) and *areas with populations most vulnerable to displacement* (considering race/ethnicity, education level, housing tenure, and income). To lessen the risk of displacement, areas with a combination of *high levels of vulnerable populations and low levels of opportunity* were removed from the ‘a’ overlay zone in portions of the St. Johns, Portsmouth, Kenton, Cully, Hazelwood and Centennial neighborhoods.

The displacement risk analysis and the resulting staff proposals are a starting point for discussion of this complex issue. Applying zone changes informed by this analysis follows an “avoid” rather than “mitigate” approach.

Staff received feedback from several organizations working on housing and displacement issues across the city, which is highlighted in the section titled “Letters from Organizations.” In addition, many comments from individuals centered on displacement, and some of these are outlined below.

No commenters supported removing the ‘a’ overlay from areas at risk of displacement. Many commenters thought additional housing opportunity should be given to areas with vulnerable populations:

Some questioned the basis for establishing the risk:

- *Please examine the claim that this overlay might cause displacement more closely. Will constructing more low- and middle-income affordable housing actually bring about displacement? Additional affordable housing capacity may help those communities better weather an influx of wealthier buyers.*

Others suggested that the causes for displacement were larger than land use regulations can solve:

- *Population displacement has to do with economics and shouldn't be addressed in the zoning code.*
- *I generally support this standard, except the standard for "vulnerable populations at risk of displacement" as I do not believe land use standards prohibiting density can or will address gentrification.*

Several commenters noted that increasing housing opportunity and small increases in density through ‘a’ overlay can help support expansion of amenities like neighborhood serving businesses and services like more transit options.

- *Absolutely do not restrict based on amenities this prevents those areas from having the density to support those in the future. Agree with excluding based on environmental constraints, infrastructure should not be a reason to exclude, just need to be strategic (and use SDCs for needed improvements in those areas). Also don't feel that risk of displacement is a good reason to exclude because again, you are then eliminating the opportunity for*

*supporting future amenities and walkable 20-min neighborhoods - just needs to be done with mitigation to reduce displacement. I think eliminating the 'a' overlay eliminates a key tool to increase housing quantity and options in our community.*

Several of the comments posited that the areas currently identified as lower housing opportunity areas are subject to change over time, especially in light of future public investment recently identified in the 2035 Comprehensive Plan, Citywide Systems Plan and Transportation System Plan. Investments identified in these capital plans could make currently low opportunity neighborhoods higher opportunity in the future.

- *The subtracted A1 zone/blue [removed parts of 'a' overlay] restricts/doesn't extend opps offered to the rest of the city to those who are already in disadvantaged areas. Help GIVE/SHEPARD opps; not restrict.*
- *Hold more conversations with the residents of vulnerable populations about whether or not to offer 'a' overlay zone to their area. They may want it to help bring in infrastructure and amenities.*

While the displacement risk analysis is intended to identify communities most vulnerable to this project, not allowing housing types limits the flexibility and opportunity for moderate and lower income home owners to utilize the alternative housing type provisions. There were many comments that a more limited application of the 'a' overlay limits the wealth generation potential of homeowners.

- *Those people with already valuable real estate (i.e. in areas not identified as areas with "vulnerable populations") will be the ones actually given the opportunity to further increase their financial standing and net worth by developing their property. Those in the redlined areas who are not given the opportunity to develop their property won't be able to add a unit and benefit from rental income or increased property value. It's very simple and all one needs to do is look at history as it repeats itself. This is institutionalized racism and while it may be well-intentioned by a few decision-makers working for the city, the unintended consequence will be the further polarization of the haves and have nots. If Portland is going to extend opportunity to some people, why is it doing so to those who already have a certain degree of opportunity, and not to those with less opportunity to begin with?*
- *This may penalize property owners in vulnerable areas, as they would not have as much flexibility with their properties compared to other neighborhoods.*

There were a number of comments that the 'a' overlay should be applied throughout the city to help address current pressures on housing costs citywide and that during a council adopted "housing emergency" the city should be allowing more density broadly across the city.

- *Vulnerable populations at risk of displacement? Less likely to happen if more affordable housing created in that very area. Doesn't make sense to concentrate the redevelopment even closer in, and in a smaller area.*
- *I don't understand the rationale for excluding St Johns and Cully. Isn't the idea that having more housing choice and supply will reduce costs?*

- *Densification should be allowed across the board in all residential zones. Homeowners looking to subdivide their home into a duplex or add a basement/garage ADU benefit everyone in this housing crisis - they should not be punished or restricted based on location*
- *Please retain the overlay at areas deemed at risk of displacement. Restricting housing choices is not among the tools cited as effective by Lisa Bates's BPS-commissioned 2013 report, "Gentrification and Displacement Study: Implementing an equitable inclusive development strategy in the context of gentrification." Research does not support reducing housing choices as a mechanism for preventing displacement.*

There were also those that opposed removing areas from the overlay that were vulnerable to displacement pressure, but with the caveat that other mitigating strategies should be applied such as programmatic support to low income renters in areas at risk for displacement, dedicated outreach and community organizational support, and prioritized financial resources affordable housing resources in the high displacement risk areas including down payment assistance and gap financing for owners and small developers.

- *Why would the City want to limit someone's ability to increase the density on their property? Other strategies that are not based in the zoning code should be employed to reduce risk of displacement.*
- *I generally like the overlay. I am not so sure about the zone subtracted from it in areas like Cully, East Portland, St Johns and Portsmouth. I think that uses a punitive measure vs an incentive (stick, not carrot) that will impact low income homeowners. We DO need to protect our renters. Are there other ways to do that? Let's not make this a renter vs owner conversation either*
- *In terms of the subtraction Overlay, I actually live in one of those areas. The concern about displacement and affordability is appreciated but, at the same time, there should be some options - perhaps more limited - for those living in these areas. I strongly think we should look at the CDCs developing affordable cottage clusters in single home zones, as well as other types of middle housing. Cottage clusters would work for both homeownership and rental.*
- *affordability pressure is going to happen anyway in certain neighborhoods, so [apply the 'a' everywhere and] couple the "a" overlay elements with measures to mitigate the displacement.*
- *Perhaps sponsor some Portland Small Developer workshops for property owners in those areas instead.*
- *Use increased permit fees to fund preservation of existing affordable homes by offering maintenance grants to qualifying homeowners through a new program.*

## Visitability

The Comprehensive Plan calls for more housing choices to accommodate a wider diversity of ages, and respond to the changing needs of households over time. The plan also calls upon the city to ensure equitable access to housing, making a special effort to remove disparities in housing access for people with disabilities and older adults, among others. The proposal includes a requirement that one of the housing units built utilizing the provisions of the 'a' overlay be constructed in order to make them visitable to people with limited mobility, such as older adults or wheelchair users.

Some people supported the visitability requirements for new units in the 'a' overlay (and other accessibility-related features of the proposal), and others made suggestions to build upon them:

- *I believe the "visitable" unit should be given an incentive, like a break on the permit fee but not be required.*
- *Thank you for supporting accessibility by limiting the number of exterior, above-grade stairs that lead to the main entrance.*
- *follow the Universal Design standard*
- *If you're going to require accessibility, you should add more FAR bonuses, since accessibility takes up usable space in small units.*
- *By increasing setback you push living space onto more floors, which is annoying for the able-bodied but exclusionary for the disabled*
- *I LOVE the requirement to make one of the units "accessible" to all. Maybe there could be a tax credit for renting to people with disabilities.*
- *I think all units should be visitable and limited to one story and thus be more affordable.*
- *I suggest that the entry requirement be "flush", rather than one-step, which really doesn't accomplish the desired effect.*
- *Visitability is pretty neat, but I don't think an adjustment should be necessary to get a ramp into a basement.*
- *[Visitability requirements] should apply to all free-standing ADUs not located above garages; no bonus ADUs.*
- *For ground floor visitability, allow alternatives to the full 60" bathroom circle found within commercial building ADA standards.*
- *I also strongly support the addition of some non-variance mechanism whereby the addition of accessibility features to a unit allow increased square footage (unit AND overall), less stringent setbacks from the lot line and/or higher maximum building heights, in proportion to the extent/nature of the accessibility feature.*

However, many commenters suggested dropping the visitability requirements from the proposal. Some were concerned about their impact on housing supply and affordability, while others were concerned for other reasons. Here are some examples:

- *I fully support duplexes and triplexes, but not the need to make them "visitable".*
- *More people have a hearing loss disability than those needing wheel chairs, so why not give incentive for houses that are acoustically treated for hearing loss? Although I'm not opposed, a no-step entry seems like it could lead to multiple other problems--from lack of privacy to greater*

*susceptibility to flooding . I do think triplexes and fourplexes should be allowed in any Additional Housing Opportunity area, WHETHER OR NOT VISITABLE.*

- *Don't make it harder to build housing with extra visitability features . . . and again, make it easier to build adu's/duplexes/triplexes on corner lots -- more housing=more affordable, and also = increased density which in the long run (unlike sprawl) requires less energy use (ie New York City) per capita -- thus environmentally friendly*
- *requiring visitability features will make basement or over-garage units non-workable. This will reduce the incentive to adapt existing housing in favor of demolition.'*
- *I think you should allow these housing types in every single family neighborhood...and not just if they are "visitabile." I appreciate the need to increase visitabile housing, but don't use it has a possible barrier to achieving the overall desired goal of smaller housing options, and more housing, in these neighborhoods. Find another way to incentivize visitability. You are pitting two good things against one another.*
- *Rather than require the visitability features, incentivize them by allowing additional FAR.*
- *Visitability seems overly complex.*
- *the listed housing types should be allowed by right in the new 'a' overlay with additional bonuses given for making one of the units "visitabile" (i.e. additional FAR). as it's recommended now, the larger requirements associated with "visitabile" units would prevent me from converting my garage into an ADU.*
- *People adding internal ADUs should receive an exemption to the multiple-front-door restrictions for the visitabile unit. The visitabile units will likely be primarily basement units, and they should be accessible from as close to the public right-of-way as possible.*
- *I understand the intention to accommodate ADA/universal design for accessibility but in doing so you're limiting the ability to have a basement level dwelling unless it's completely submerged below grade.*
- *I would remove the visitability requirement, or alternatively, require it with one more unit allowed (so triplexes and quads instead of duplex and triplex)*
- *If 'accessible route' means ADA- accessible, this could be a problem for internal circulation on larger sites. Requiring the main path to meet this standard is reasonable. But sometimes it's not practical to connect the main path to each front door without exceeding 5% grade, even on fairly flat sites.*
- *Visitability requirements should not apply to dwelling units contained within the original structure, or to an ADU added above a garage.*

## Historic preservation

Many people supported the proposed incentives for historic preservation. Several people wanted internal conversions to be allowed citywide, not just in the 'a' overlay. Many people did not want to waive parking requirements; others did (see the subsection titled "Parking impacts on affordability" above for more).

Several commenters wanted the incentives to apply to more homes:

- *Allow interior conversions of sfrs to 2 or more units, depending on size of the lot.*
- *Allow internal conversions into 2-4 units for any house more than 10 years old.*
- *"Historic resources" is a very specific term and very few existing intact houses meet this criterion, despite the rich and valuable character they may have. These incentives should be expanded to intact, quality existing housing stock, beyond just historic resources.*
- *Allow historic internal conversions anywhere in the city, not just in the "a" overlay.*
- *Expand the list of eligible structures to any home built before 1945.*

Some people were concerned that the historic preservation incentives do not go far enough:

- *No density limit for historic resources. Allow flexible site plans reduced parking requirements and additional FAR.*
- *Waiving parking requirements and adding additional FAR will not promote preservation of historic resources because even if the structure is left standing, it's context will be ruined.*
- *Increase permit fees to make demolition of affordable housing stock and historic resources less profitable in speculative development.*
- *Promote preservation by cutting fees in addition to additional FAR and housing type flexibility*
- *Off street parking should not be required in any instances*
- *Street-facing facades must be preserved in an internal conversion.*

Some expressed concern that the proposal may not sufficiently protect historic resources:

- *Since the City is embarking on HRCP 2 [Historic Resources Code Project], 33.405 should not cover in any way, any existing or new historic district, and HRCP 2 should be charged with dealing with additional density and "visitability" provisions. HRCP 2 will be covering ADUs, conversions, and other matters discussed in 405. At a minimum, subsections 405-050-080 should not cover any existing or new historic district and should be added, if at all, through the HRCP process. No site in an historic district should be allowed to use the bonus provision if the resource has been demolished. There should be no FAR bonus for conversion of historic resources in an historic district. The revised code must make clear that such regulations will not eliminate or change existing requirements for Historic Resource Review, and 405 will not provide an alternative regulatory path to bypass HRR, regardless of the zone designation.*
- *Internal conversions: Should require the retention of the original primary structure including front setback and entry façade during the creation of an internal ADU or internal conversion. Internal conversions should require design review to insure a minimum level of quality and to confirm that the existing shell with very limited additions or modifications to the façade are included.*

- *Note that in some cases the Goal 5 Rules apply although HRR does not, e.g. when a full program of historic resource review has not yet been applied to a newly-listed National Register district or property. The street-facing exterior wall (facade) should not be replaced. Any addition should be set back at least 15 feet from the facade. The 50% constraint should be applicable to the side and rear exterior walls. It should be clear that the size and scale of converted historic resources must be approved by HRR when applicable; Table 405-2 may not supersede HRR.*
- *Require that the street-facing facade remains intact when a structure is internally converted, and ensure we have a clearer definition "demolition" and "major remodel" to ensure internal conversions don't lead to de facto demolitions. Disqualify projects involving the demolition of "viable" structures from eligibility for any of the overlay bonuses, allowing bonus units only when existing structures are preserved.*

Some people did not support the incentives in concept:

- *Disagree. We have gone overboard on the limits placed on homeowners in historic districts. However, proposal to waive parking requirements and other flexibility are good.*
- *I think "historic preservation" will be used as a tool to prevent modern structures from being built in my neighborhood which I'm against. I would like to see my neighborhood modernized as it will increase my property value.*
- *I'm concerned about allowing additional FAR for historic resources unless the existing structure is not in compliance with the proposed rules (i.e., the historic structure could remain even if it exceeded new, more restrictive FAR). If, however, limited historic preservation would occur (e.g., significant tear-down), then additional FAR should not be allowed.*
- *I'm concerned that historic preservation will be used liberally in a non-productive way to save unremarkable housing filled with lead paint, lacking insulation, and built atop a crumbling foundation that will buckle in the next earthquake.*

Some commenters noted the need to update the Historic Resource Inventory or offered other ideas:

- *Before considering the RIP Draft, the City should update its historic resource inventory, begin public review of demolitions, require deconstruction when a home cannot be saved (not just for pre-1917 homes), tax landfill waste, remove hurdles to relocation and provide financial incentives for preserving existing homes.*
- *The city has no comprehensive inventory or ranking of historic homes and other structures. The city needs to establish an inventory to prioritize maintenance of the highest quality, most historically significant residential architecture.*
- *How about also incentivizing adaptive reuse of all existing homes that are deemed viable?*
- *Adopt a rule for automatic inclusion on the Historic Resource Inventory. Given the esthetic value of various building periods, use 1950 as a cutoff: anything prior gets inclusion on the HRI. Allow larger ADUs, to the maximum lot allowed square footage, as a historic preservation bonus. Keep the SDC waiver for 2nd ADUs, as a historic preservation bonus. Apply SDC to demolitions of houses on pre 1950 houses if the new construction does not create more units than the demolished structure. Close the two wall loophole for pre 1950 houses, where effective demolitions are not treated as such.*

## Tree preservation

Council's concept report included direction to explore incentives or other flexibility to encourage the retention of mature trees. Staff evaluated several ideas but ultimately did not include "by-right" flexibility proposals for tree retention, instead relying on existing tools to evaluate tradeoffs and impacts on a site by site basis using more discretionary criteria.

Some commenters observed potential benefits for additional tree preservation with smaller house sizes or cottage clusters:

- *Yes, I think house sizes should be proportional to the lot size to allow for large trees and more green space. I am concerned about the current trend for developers to build huge homes in close proximity to each other, reducing green space to the bare minimum.*
- *[Cottage clusters] will provide more allowances for tree and habitat preservation and make way for a diversity of housing types. I do think the environmental stipulations could be made to be stronger. I.e. all mature trees greater than 12 inches dba are to be preserved outright.*

Though there was disagreement about the increased front setback and its effect on retaining trees, as well as suggestions to allow for smaller front setbacks when trees are retained:

- *The RIP should not increase the minimum front setback from 10' to 15'. Instead it should reduce the front setback to 0 if doing so will allow for the preservation of an existing tree above a threshold size.*
- *Please do not increase the front setback to 15. This will potentially jeopardize yard trees behind the house.*
- *Yes, we support generous setbacks in the front to protect the visual nature of historic properties and to protect trees, which are often in front yards.*
- *Add an additional exception to the required setbacks at 33.110.225 D. as follows to create more flexibility for on-site tree preservation: "D.5 Tree preservation. The front building and garage entrance setback may be reduced to zero if it would prevent a tree that is 12 inches in diameter or greater in the rear or side yards from being removed and prevent no more than 25% of the tree's root protection zone from being disturbed, as required for preserved trees under Title 11, Figure 60-1. Where a side lot line is also a street lot line the side building and garage entrance setback may be reduced to zero. This allowance is automatic and does not require the developer to go through an adjustment/variance process."*

Others suggested additional ideas to promote tree retention:

- *allow minimum parking be reduced by one parking space for each tree 12 inches in diameter and larger that is preserved; required on-site parking may be reduced to zero under this provision. However, if all parking is removed, the curb cut must be removed. Change to: required parking may not be reduced below 4 parking spaces under this provision, except within the residential 'a' Housing Opportunity overlay zone, where the minimum off-street parking requirement may be waived to zero under this provision. Tree code exemptions for small residential lots (Development activities with ground disturbance or a construction staging area greater than 100 square feet on unpaved portions of the site where there are Private Trees 12 or more inches in*

*diameter and/or City Trees 6 or more inches in diameter and the site): remove "is 5,000 square feet or larger in area."*

- *Add an exemption for flexibility if you divide your lot but maintain an existing grove of trees or open space. Offer conservation easements to encourage open space in areas that do not conform to the one mile park area.*
- *Tree protection on R2.5 lots previous R5 with lg trees? Flexible building area to save trees [with arrow pointing to diagram]. Add drip zone square feet to F.A.R. allowed in houses*
- *The Title 11 tree preservation standards at 11.50.040 should be revised [to remove tree preservation exemption from lots less than 5,000 square feet] to apply to more sites within the residential zone where the new residential infill standards will apply. This change would remove exemptions on tree preservation standards for small residential sites.*

## Comments on Proposals

This section focuses on the comments on the project's 12 proposals received via the comment form that was distributed online and in paper form. This section also includes the comments received via email and lobby exhibit that were relevant to a specific proposal. Note that some of the comments received focused on the key themes described above and are not replicated here.

### SCALE OF HOUSES

#### 1. Limit the size of houses while maintaining flexibility (R7, R5 and R2.5 zones).

- **Establish a limit on house size by zone that is proportional to lot size using a floor area ratio (FAR) calculation.**
- **Exclude attics with low ceilings and basements from house size limits.**
- **Allow an additional .15 FAR for detached accessory structures (such as garages, sheds and accessory dwelling units).**

In previous rounds of outreach, the public expressed a fair amount of support for the scale proposals as well as some opposition and suggestions to increase the floor area ratio (FAR) allowed for duplexes and triplexes. This report focuses instead on new suggestions and concerns in response to the Discussion Draft.

Many commenters urged that attic and/or basement space should be included in FAR measurement:

- *Excluding the attics and basements and allowing ADUs defeats the purpose of limiting house sizes.*
- *It we are going to give our citizens what they have been asking for - reasonably sized homes that fit the neighborhoods they are being build in, you should not allow loop holes like excluding "attics" and "accessory units"!*
- *Exclude only basements that are completely below ground, as opposed to houses raised well above street level with the basement/garage as the prominent street level feature.*
- *Include basements in total FAR for the house, unless first floor is no higher than 3 feet above grade. Most existing homes have a finished floor elevation that is not more than three feet above the lowest ground elevation.*
- *The basement exclusion should be dependent on how far below grade the basement is. Basements that extend above grade by 50% or more and "walk-out" basements should contribute to the house size limits.*
- *Basements should only be excluded if at least 75% below grade*
- *Please further limit structure size, perhaps by including basements and attics in calculations of a house's square footage if they are less than 2ft above ground*
- *Basements with wall area less than 3 feet above grade should not be included in FAR (as proposed: area where basement walls are at least 4 feet below grade is addressing the problem in an inverted way)*
- *Include all habitablespace in the FAR. In addition to the main floor and second floor, include basements extending more than two feet above grade and finished attics higher than 80 inches.*

*Not including basements and attics could easily result in houses with over 3200 square feet of habitable space.*

However, a couple commenters suggested the contrary:

- *Since neighbors complaints about new home construction being too big are related to the visible square footage (ie above ground), then why not exclude any square footage that is primarily below ground (ie basements) since that doesn't impact the old home neighborhood character in the same way as above ground square footage. This would somewhat mitigate the loss in opportunity to landowners under the new rules... and even with this caveat I think that given the housing CRISIS that we are facing, then the massive reductions in buildable home size makes no sense. Not all of those large new homes have just one family living in them and we need more residential square footage in this city, not less.*
- *Basements with wall area less than 3 feet above grade should be not included in FAR. (as proposed: area where basement walls are at least 4 feet below grade is addressing the problem in an inverted way)*

Some commenters did not support the additional FAR for detached accessory structures like garages, sheds, and ADUs. However, others suggested an increase in FAR for detached accessory structures. Here are some examples:

- *Increase the size of basement ADU conversions to allow any size up to full size of the basement level by right.*
- *.15 FAR is insufficient for ADUs and other detached structures. For the normal 5000SF lot, 750 SF for an ADU on top of a garage wouldn't work.*
- *I think the proposed FAR limits are a little too low (maybe by .05 each zone), and the proposed FAR bonus for detached accessory structures should be bumped up to .20. People like space and also need room for storage.*
- *I would allow a higher addition for detached structures.*
- *I am concerned that the limitation is too small, especially for houses that will have an internal ADU, or will be duplexes. The .15 FAR for detached structures would not allow a garage as well as ADU, if the garage is counted. Should be more.*
- *I agree with this policy change. My only concern is the 0.15 FAR for detached structures is very limiting for smaller lots. A 2,500 sf lot, for instance, allows only 375 FAR for a detached unit. This is too small to allow for a garage and small ADU. Perhaps scaling the additional FAR for smaller lots to 0.20 or 0.25 would be more reasonable. These structures should not be large but I think it is important to allow for utility space and the addition of an adequate living space.*
- *I believe that the additional FAR for detached accessory structures should be scaled similar to how the house sizes are scaled, i.e. R2.5 needs a greater allowance than R7.*
- *My only concern is the small FAR allowance for smaller lots. I think the FAR addition for detached ADUs on smaller lots should be scaled to 0.20 or 0.25 FAR.*
- *My suggestion is to scale the detached accessory structures allowances similar to how the FAR is scaled for primary residences in each of 3 zoning categories. . In order to keep the scale of these detached units in line with the rest of the plan, you could limit the total square footage allowed*

to 1000 square feet. If the footprint is a concern, there could even be a provision requiring detached accessory structures over X sq ft to be two stories.

- I urge revision of the proposal to allow up to 800 s.f. for an R5 detached structure. Second, regarding the R2.5 FAR, I urge revision of the proposal to allow up to 550 s.f. (not 375) for an R2.5 detached structure.
- Increase the allowance for each detached ADU to 0.2:1.

Some suggested additional FAR for affordable units (see additional comments related to scale & setback impacts on affordability in the "Affordability" theme above for more).

Some people wanted flexibility for green/high performance building provisions. Here are some examples:

- I support this measure, but strongly urge you to exclude highly insulated walls and roofs from the calculation. Otherwise you are disincentivizing energy efficient construction and are at odds with the Portland 2015 Climate Action Plan.
- Allow exemptions for super insulated homes that provide additional wall depth for added insulation
- At first it may sound like a minor impact, but looking at the numbers, it is in fact quite significant. A quick case study illustrates the impact: [the comment included an example that showed a 2-story home with 285 linear feet of walls. Comparing 12" vs standard 7" wall construction, the square footage impact was 119 square feet]

Some people offered other specific ideas relating to scale and FAR:

- The proposal for defining "floor area" penalizes homeowners who have existing low-ceiling basements. Our house, built in 1909, has a 1200 sf unfinished basement with a 6'-4" ceiling. It extends above grade 4' but below grade only 3'-6", meaning that it would all count as floor area even though it does not have a high enough ceiling to be legally converted to habitable space. If I wanted to add 500 sf to my house, I would not be able to, since the unfinished basement maxes out the FAR. Since it appears that the point of this proposal is to limit the height of basements above grade, it would make more sense to set a maximum height above grade (4 or 5 feet?) below which basements would not count as floor area.
- I would like to see footprint lock in as well- if you have front and backyard of 800 square feet open space- that must be maintained in any area that is not zoned for heavy traffic apt/condo buildings.
- I think a per dwelling unit (ADUs included) measurement system would make more sense.
- Should not apply at all to new additional ADU units on lots.
- One simple way to reduce demolitions while also increasing the amount of available housing would be to limit the size of new houses to the size of the house that was torn down, unless the new structure includes multiple units.
- If you allow additional FAR for detached accessory structures, I would like to see a requirement for street improvements.
- First, for R2.5 - 2,500 s.f. standard lots, instead of the proposed 0.7:1 FAR at 1,750 allow 0.72 FAR at 1,800. Second, for R2.5 - 1,600 s.f. minimum lots, instead of the proposed 0.7:1 FAR at 1,120 allow 0.75 FAR at 1,200. As proposed, the maximum house sizes for the R2.5 at these

*two lot sizes seem a tad too restrictive. I also thinking having rounder maximum numbers (1,800 and 1,200) will be less difficult to know, remember, and implement.*

- *Emphasis is needed on basement space. More of this will help us more than cheesy ADU's etc. Increases in basement space should be mandated by the city.*
- *[diagram showing decreased proposed scale in R zones compared to increased proposed scale in C zones with an arrow between them labeled "odd relationship"]*

## **2. Revise how height is measured (all zones).**

- **Continue to allow 2½ story houses on standard lots (30 feet high).**
- **Measure height from the lowest point near the house, not the highest point.**
- **Clarify that small dormers are excluded from the height measurement.**

Several people suggested basing allowed height on the number of units inside (in addition to basing the size of the structure, or FAR, on the number of units). Here is an example:

- *Revising how height is measured sounds like we are trying to preserve suburbia! I believe we should allow 3 and even 4 story houses as long as they have at least 3 or 4 units in them.*

Some people supported measuring from the lowest point near the house, but others suggested alternatives. Here are some examples:

- *I disagree with this; I live in SW Portland on a slope; it would be ridiculous to shorten the house so much. Maybe instead of the lowest point it might be the midway point between the two houses - but no shorter than adjacent houses*
- *need to see something that ties into existing neighborhood- can not go over 5 feet above the existing median height of housing on that block.*
- *This does not fit with current development. Houses on lots that sit above the street grade sit much taller than those that sit as street grade. Perhaps an average between front and rear elevations?*
- *The average lot elevation should be used, not low or high.*
- *The height should be from street or sidewalk, if not the highest point on the site*
- *should also include provision regarding height at setback as opposed to height at center-line. 30 feet at 4' from property line has an adverse impact on existing homes.*
- *Measure building height from the driveway of a tuck under garage*
- *On a similar upward sloping lot you can't measure height from the bottom of a 5 foot retaining wall, it has to be measured from the yard around the structure.*

Some people did not want dormers to be excluded from the height calculations.

- *measure height from lowest point, AND REDUCE HEIGHT ALLOWED; dormers should not be excluded*
- *I disagree with excluding small dormers.*
- *Dormers should count in the 30' - they make the house look too tall compared to neighboring homes - it's an unnecessary loophole to allow excess height!*

Some people suggested different height limits than proposed – usually lower height limits (20', 25', or two stories), but sometimes higher (35' or three to five stories) – and some people supported the

current height limits. Several suggested varying height limits based on nearby homes. Some commenters offered other specific ideas about height measurement:

- *if you are going to reduce the height for detached structures in R 2.5 to 30 feet then also do the same for attached structures in R.2.5, especially if the plan to rezone areas with historically platted narrow lots to R 2.5 holds. Having 35 ft tall attached townhomes next to / inter-mixed with 30 ft. tall s.f. homes will continue to bother people who don't want those housing types in their neighborhood! I understand this proposed height change is to reduce concerns about stand-alone skinny houses, and doesn't seem necessary in that context as a typical narrow lot structure likely can't get close with the 1.5x the width requirement (15' wide house x1.5=22.5').*
- *I don't think it's worthwhile to distinguish heights between R5 and R2.5.*
- *Measure height to the ridge line of the house and fronting curb. Do not allow the house to be larger than the adjacent neighboring houses by more than 9'.*
- *Allow houses to be up to 30 ft. if at least 50% of houses within 300 ft. are larger and taller than 30 ft.*
- *I like the increased uniformity of setbacks you have proposed, and would like to see a similar approach applied to height, perhaps limiting houses to a height of their tallest neighbor plus 5 feet.*
- *Please consider your proposal to consider the height of a dormer if based on its distance from the outer wall.*
- *A better rule might base the height contribution on distance from the property line (and not the setback).*
- *Measuring [height] from the midpoint elevation adjacent to a structure (which is lower than today's allowable height) with the following incremental height system. RF through R5: 1 and 2 units: 30 feet; 3 and 4 units: 35 feet. RF through R2.5: 1 and 2 units: 35 feet; 3 and 4 units: 40 feet.*
- *Vary roof heights to correspond to lot size by allowing higher roof lines on larger lots with greater side setbacks. Limit roof height on a 5000sf lot to 25 feet with step ups to 32 feet for larger lots. Exception: If at least 50% of houses within 300 feet are taller than above limits allow houses to be up to 30 feet high.*
- *Allow heights of shed roofs to be measured to mid- point of shed if the low point of the shed roof is closest to the relevant property line and the high point of the shed is at least twice the legal setback from any other site property line. Similarly, allow sheds heights to be measured to mid-point in attached house situations where a property line cuts through the middle of a gable roof.*
- *We recommend that height be measured from the roof's highest point*
- *The code should not allow low point of street facing property to be artificially raised through use of a retaining wall and the grade should not be allowed to be artificially built up to alter reference point ("low point") for measuring height of the building.*
- *limit the the maximum height of the first floor to be 3 feet above the lowest grade, 5 feet from the house.*
- *Allow heights of shed roofs to be measured to mid-point of shed if the low point of the shed roof is closest to the relevant property line and the high point of the shed is at least twice the legal setback from any other site property line. Similarly, allow sheds heights to be measured to mid-point in attached house situations where a property line cuts though the middle of a gable roof.*

- *Height limits can penalize well-insulated homes with raised-heal trusses.*

### **3. Improve front setbacks to better reflect those of adjacent houses (R7, R5 and R2.5 zones).**

- **Increase front setbacks in R5 and R2.5 from 10 feet to 15 feet.**
- **Allow a front setback reduction to align with the house next door.**

In prior rounds of outreach, commenters supported increasing setbacks to the largest setback on the street, using the average setback of the street, or not allowing reductions to match adjacent houses, for example. Other people wanted to retain existing setbacks or reduce them (to 5', 10', or 12', for example).

Several commenters focused on the impact of setback regulations on housing supply and affordability; see the subsection titled "Scale & setback impacts on affordability" above.

Some commenters offered specific ideas about setbacks:

- *Increase setbacks to match adjacent existing homes, no numeric standards. Increase setbacks for corner lots for traffic visibility. Increase setbacks for properties without public right-of-way planting strips in order to allow for large trees.*
- *This is too strict, as front lot lines should be allowed to slowly move toward the street. How about any house within 100 feet on the same block?*
- *might consider one of the four sides of the lot, that the setback could be less if 1. no neighbor had a problem & 2. a reciprocal amount is added to the opposite side*
- *how about allowing a min 10' to max 15' range depending on neighboring houses, but matching setback is not mandatory. That way home owners can plan on leaving enough room in the back of the house for future ADU etc.*
- *Setbacks should be waved when house features more than one unit.*
- *Exactly match existing setbacks of adjacent houses.*
- *New subdivisions should be exempted from this front setback requirement if the setback is placed on the side or back. This is similar to what Seattle does.*
- *If you really want to placate the residents of the South Burlingame neighborhood, only increase the setback if no houses in the neighborhood are closer than 15'. Otherwise, allow everyone in older neighborhoods to build within 10' of the P/L. Or, at least, allow the house closest to the street within a 2 block radius, or even on that block, to dictate the minimum setback. The current "adjacent house match" limitation is too limiting and capricious.*
- *On corner lots where front and sideyard setbacks, define parameters where front yard setbacks apply on both street facing sides of the lot. This reduces the impacts to the houses next door on both streets. Safe crossings for pedestrians at street intersections are better accommodated when sightlines are clear. Fenced sideyards obstruct the clear sightlines at street intersections.*
- *Disagree. Front yards are generally not safe for children to play unsupervised, given the low fence in the front yard standard. Increase the rear setback instead.*
- *Setbacks should be minimum ten feet, maximum 30 feet.*
- *Allow zero front setback if a shopfront is used for the building frontage.*

- *This should only apply to garage fronted homes, front doors and porches look good close to the sidewalk*
- *At the very least, permit new development to be set at 10 feet if \*any\* existing property on the plot, and not just adjacent, is at 10 feet setback or less.*
- *As RIP proposes to allow shorter front yard setbacks to conform with adjacent houses, the RIP should similarly consider conformance with adjacent houses in terms of height, overall size, and deeper front-yard setbacks. As such, we'd require each lot being redeveloped to a multi-unit model to have no less than two units with 3 bedrooms/1 bath and access, to unpaved, outdoor space for each.*
- *Corner side yards need to be increased to 10 feet. The proposal favors the 10 foot front setback based on the presence of one adjacent property that may have been recently built.*
- *The language to allow 2' eaves provides an exception in cases where the eave would be 3' from a property line. This doesn't account for situations where the setback is 0' (e.g. alleys or zero-lot-line development). Add language stating that if a setback is 0', the eaves can go right up to the property line.*

#### **4. Improve building design (R10, R7, R5 and R2.5 zones).**

- **Limit the number of exterior, above-grade stairs that lead to the main entrance.**
- **Allow eaves to project up to 2 feet into setbacks.**
- **Require large, street-facing facades to be divided into smaller planes.**

A fair number of commenters supported this proposal, while others found the proposal to be overly prescriptive. Still others offered alternative regulations.

##### ***Level of design regulation***

Some commenters found this proposal unnecessary, thought design should not be regulated to this extent, or urged flexibility for creative design. Here are some examples:

- *I personally can't stand and wouldn't buy the newer houses with 15 steps leading up to the door, but if someone wants that, it's okay.*
- *Design is artistic and shouldn't be regulated by government.*
- *No, we don't live in a suburb HOA. People should be able to design what they want on their own property as long as life safety is not impacted*

On the other hand, a couple commenters suggested design review. Here's an example:

- *Additional requirements: design review to match surrounding established neighborhood in height, setback, overall design.*

##### ***Comments about stairs***

Some commenters expressed concern about the proposed limitation on number of stairs or wanted it to be less restrictive:

- *Many older houses have 8 or 9 stairs up to the front porch. The 6-stair limitation would put a lot of older houses in non-conformance.*

- *This [stairs] proposal effectively kills the idea of townhouses. We were in Montreal this summer and it is full of townhouses with many staircases to their multiple units. Builders put the stairs outside to create more space inside. We need more places for people to live and the placement of stairs shouldn't be a limiting factor. BTW: Montreal house prices and rents are about half ours. They have used townhouses to build enough density where people want to live.*
- *Exterior, above grade stairs are fine. The US is becoming a poor country. We should allow less fancy kinds of stairs.*
- *Allow stairs to be 5' from grade to front door. Gives more flexibility for partial below grade ADU's.*
- *Only limit the stairs in buildings with garages.*
- *This [stairs] standard could lead to much more excavation on sloped lots, where currently the garage is the lowest living area and the living areas are on the second and third levels. We need different standards for down-sloping lots and up-sloping lots.*
- *Limit the height of the stair run, not the number of risers. Otherwise you will push people who have a lot of elevation to deal with toward designing stairs with a maximum riser height, rather than giving them an option to design a more gentle stair riser height.*
- *Only limit the number of above-grade stairs if there are no ground floor/basement accessible units for ADA applicability.*
- *I suggest the standard [number of stairs] be changed to 8 steps maximum*
- *Limiting the number of exterior above-grade stairs is problematic since it will have the effect of encouraging taller risers. For example, 6 steps with code-maximum risers of 8" would allow a house to be 4 feet above grade, but 6 steps at a safer riser height of 6" would only allow a house to be 3 feet above grade. It makes more sense to limit the height of the floor to a certain height above grade (4 feet?) and allow more flexibility in the number of steps. The requirement to divide facades into areas of 500 sf seems arbitrary and would have a side effect of encouraging complexity for complexity's sake. This could lead to poor design.*
- *The one piece that concerns me is the unintended consequences of limiting the front entry stairs by the number of risers. I feel it would be more appropriate to limit by overall height. Limiting by riser will incentivize more structures to be built with the maximum allowable riser height. Limiting by height would have the same overall effect, but allows for more gentle entry stairs.*

Other commenters supported the stair provisions or wanted them to go further:

- *Please encourage accessible entrances instead of assuming that everyone can climb stairs.*
- *Must include an associated maximum rise and run (7 rise to 11 run for primary entry should be the maximum, 6:12 the standard).*

### **Comments about divided facades**

Most commenters found the requirement to divide large facades into smaller planes unnecessary or unhelpful:

- *Broken up planes are more complicated to air seal, leading to less energy-efficient construction.*
- *Dividing facades into smaller planes adds cost to construction and inhibits design choices.*
- *More detail on smaller planes please. The requirement for this on multifamily housing for the community design standards has created some incredibly ugly buildings.*

- *Not so sure about the fascade division requirements, as most 1940's and early houses are effectively boxes.*
- *Smaller planes are nice, but more active facades would be better.*
- *I support the 3<sup>rd</sup> [divided planes] if the housing is attached (rowhouse, townhouse, duplex, etc...)*
- *Reject. (This is already in the code for larger buildings, is abused by the application of multiple siding types, encourages front facades divorced from the rest of the house, and is unnecessary for the scale of structures under discussion for average sized lots.*

### **Comments about eaves**

Some people did not want eaves to project into setbacks or wanted more clarity:

- *I disagree with allowing eaves to project into setbacks.*
- *Do not include eaves in setbacks at all.*
- *Add clarity to the eave projections - define measurement (Exterior face of finish building wall to the outermost edge of roof including gutters). Update calculation for site coverage area to include the area under the 'eave' as part of building coverage*

One person wanted a greater allowance for eaves:

- *Allow eaves to project up to 3 feet into setbacks.*

Another offered a suggestion for revision:

- *The language to allow 2' eaves provides an exception in cases where the eave would be 3' from a property line. This doesn't account for situations where the setback is 0' (e.g. alleys or zero-lot-line development). Add language stating that if a setback is 0', the eaves can go right up to the property line.*

### **Other ideas**

Some commenters offered other design-related ideas not in the proposal:

- *Encourage 1-story front porches (without building area above) by allowing them without requiring an adjustment process, which wastes staff times and adds cost to the applicant (who may not build the porch due to the expense).*
- *Remove the silly restrictions on multiple front doors on homes.*
- *There is a trend toward constructing "screens" or other constructions in front of windows, both on single-dwelling and multi-dwelling residences. this is probably for privacy, but also seems to be a modern "look". However, In order to accomplish the purpose of this standard, these, as well as glass block, should be called out specifically as not meeting the standard, of allowing views from the window to the street. Looking out through a "screen" limits building occupants' views of people walking on the street, and also removes the feeling of safety for walkers, that is provided by the "eyes on the street" that visible windows provide.*
- *I encourage, though, a new look at the paving standards, that would allow gravel alleys, so this requirement is not as burdensome as hard paving requirements, which would be an issue especially for low-income housing providers. Also, a specification of amount of grade on the lot, or between the alley and the lot, could trigger an exemption, without need for an adjustment.*

- *Only apply housing compatibility requirements (e.g. corner and midblock duplexes, detached ADUs), increased street setbacks and reduced height limits to portions of the city with the “a” overlay (if it isn’t going to be city-wide, which would be my preference).*
- *Only require covered porches for ADUs if they’d also be required for primary dwellings. I can’t think of a public policy argument for creating a double standard on this, with an ADU requiring something that wouldn’t be required for the main house.*
- *Drop requirement that main entrances on corner plexes face different streets and that homes with internal ADUs can only have one door facing the street (unless a second one had existed prior to conversion). There are plenty of homes in established neighborhoods (including expensive ones like Ladd’s Addition) where 2 doors on a main house or duplex face the street – and this doesn’t negatively impact the neighborhood.*

## HOUSING OPPORTUNITY

### 5. Create a new Additional Housing Opportunity overlay zone

#### – the new ‘a’ overlay zone.

- **Allow the following housing types in the new ‘a’ overlay if one of the units is “visitable”:**
  - **House with two accessory dwelling units (ADUs), one attached and one detached**
  - **Duplex**
  - **Duplex with one detached ADU**
  - **Triplex on corner lots**
- **Require the following visitability features for one unit: a low- or no-step entry, wider halls and doors, and living space and bathroom on the ground floor.**
- **Allow an additional 0.15 FAR for triplexes on corner lots.**

In previous rounds of outreach, the public expressed both support and opposition to the ‘a’ overlay, including suggestions to limit or expand the housing types allowed. Most comments in response to the Discussion Draft centered on housing supply, affordability, and the visitability requirement; see the “Key Themes” sections above. Those who opposed the overlay proposal were largely concerned about the number of units that would be allowed, impacts to infrastructure, parking, and neighborhood character.

However, some commenters offered new, specific ideas.

#### ***Specific ideas related to FAR***

Commenters who had suggestions about FAR urged greater FAR than proposed, either for multiple units or for other reasons:

- *Bonus FAR is great. Let's have more, for instance, bonus FAR based on distance from higher intensity zones.*
- *As a tenant, I support this overlay and would like to increase to 1.0 FAR for all residential zoned areas in order to better reflect the character of residential areas (with many non-conforming plexes and small apartment buildings).*
- *The additional FAR should be greater. The square footage allowed for multifamily housing should be at least 25% higher than that allowed for single family.*
- *Allow 4 units by right. Create an incremental FAR that would incentivize developers to quadruple the number of units they build. RF, R20, R10, & R7: 0.4 (1 unit), 0.6 (2 units), 0.8 (3 units), 1.0 (4 units). R5: 0.5 (1 unit), 0.75 (2 units), 1.0 (3 units), 1.25 (4 units). R2.5: 0.75 (1 unit), 1.0 (2 units), 1.25 (3 units), 1.5 (4 units).*
- *for each additional unit built, an incremental increase in allowable FAR and a decrease in SDC charges should be offered.*
- *Increase the size of basement ADU conversions to allow any size up to full size of the basement level by right. Limiting them to 800 sq ft does not make sense when many basements exceed 800 sq ft. This is something Portland should have done years ago and it should be updated in this code.*

### **Comments about density**

Some commenters had specific reactions to proposed densities:

- *Density calculations should be performed before subtracting land area lost to Right-of-Way dedications, as is being contemplated in the 'Better Housing by Design' update for multi-dwelling zones.*
- *That there is even R2.5, R5, and R7 within 1/4 mile of MAX stations and 1/4 mile of 15 minute corridors is a failure of zoning as these are not densities that provide a ROI for these public services. So improve the overlay by making it allow for enough units that it promotes the resulting occupancy up to R1, RH, RX.*
- *Allowances should be different in different zones. Higher density zones should allow more; lower density zones less. That would be more consistent with the reasonable expectations people had when they bought their properties.*

### **Different unit configurations or greater flexibility**

Several commenters supported more flexibility in how units are arranged on a site or suggested different types of units:

- *Why force any specific configuration of units? Would three (stacked) units on non-corner lots be so bad? Then houses could have some room for a small back yard.*
- *Make all dwelling units attached.*
- *Allow ADUs separate from the house to be attached to each other (ADU duplex).*
- *Allow lots eligible for 2 ADUs to combine allowed square footage into one 2-bedroom unit.*
- *Allow any combination of internal and external ADUs (capped at 2 total). I recognize that building codes and economics point naturally in the direction of 1 internal and 1 detached. But if someone wants to have 2 internal ADUs – and can do so within FAR constraints – why not let them? And if someone can fit 2 detached structures on their property without tripping over the caps on FAR, detached accessory structure size limits, and lot coverage standards, why not let them do so?*
- *I do not think the requirement for one of the ADUs to be attached and one detached is helpful. Structures being attached and detached can be gamed. I would prefer to see a limit by number of units, with massing limited by FAR, setbacks, and height limits. Conflicts with affordability and durability goals. Sometime building detached can be easier than trying to tie in – existing roof may slope only toward area to attach.*

### **Land divisions for corner lots**

Several commenters supported expanding the options for corner lot duplexes that allow fee-simple ownership to mid-block lots that would be allowed two units:

- *Rewrite provisions for mid-block duplexes and corner triplexes (or 4-plexes with a bonus) to mimic the current corner duplex code, which allows each unit its own lot, and allows units to be owned separately.*
- *For corner plexes and mid-block duplexes, mimic Portland's existing corner lot duplex provision so builders can insert property lines between attached homes. FAR limits and other constraints would still apply, and use of this provision would preclude getting an ADU as well. Allow so builder can either construct a duplex or 2 attached homes each with their own lot, subject to FAR*

*and other constraints. Use of this provision would preclude getting an ADU on the property as is currently the case with corner duplexes. Drop off-street parking requirement in all SF zones. Consider requiring developers to sign a 'waiver of remonstrance' if they exercise this option so their property becomes an automatic 'yes' vote should a parking district be proposed that includes the subject property in the future.*

- *For corner plexes and mid-block duplexes, allow attached homes (on their own lots) subject to the following lot size constraints:*
  - *In the R5 – R20 zones, lots must meet the minimum lot dimension standards stated in Chapter 33.611, Lots in the R2.5 Zone.*
  - *In the R2.5 zone, there are no minimum lot dimension standards for the new lots. This mimics the way corner duplex lots are treated under existing code (33.110.240.E.3.)*

### **Specific ideas about lot size**

Two commenters suggested alternative lot sizes to use the 'a' overlay provisions:

- *There are many conforming R5 lots, especially in inner-ring neighborhoods, that are substantially smaller than 5000 square feet. It's clear from the staff report that you don't want to see a conforming lot split to double the permissible density of the site, but it would be a shame to force the 3600 sq. foot lots in Buckman (like the one I own) to pay to be rezoned because they're slightly too small to qualify for the extra unit.*
- *I do NOT support triplexes in the 'a' overlay district except in certain locations (i.e. corner lots or lots substantially larger than 5,000 feet in the R-5 district).*

### **Other ideas**

Several commenters had other ideas about the 'a' overlay:

- *In today's code, a lot adjacent to a commercially zoned parcel gets an extra unit. This could be expanded to structures sharing a rear lot line with a commercial or multi-dwelling zoned lot.*
- *since a house with a duplex 500' from transit requires one parking space, then a triplex on a corner should also only require one parking space.*
- *The city should develop form-based guidelines that establish the preferred look and feel of homes in a given zone rather than prescribe arbitrary unit counts.*
- *In situations where a single home sits on a lot where the base zoning allows for 1 or more additional homes, allow more homes with a minimal Type Ix? land use process. This would make it more feasible to bring under-developed properties up to base levels of density – where currently property owners would need to go through a subdivision process and/or a Type II or III planned development process.*
- *Builders build for profit, what incentive do I have to build multiple small units vs one larger one? All things being equal, sales/price is driven by square footage of the building. So if I can build a sfr of size x or a duplex or triplex still a total of size x, the sales price is not substantially higher. I cannot afford to build it at a profit if having to pay the sdc's. I find it hard to believe that builders will build multiple small units in lieu of a larger one without some assistance in the way of reduced sdc fees for the small units.*

## 6. Apply the new 'a' overlay zone in select areas.

- **Apply the new 'a' overlay to properties zoned R7, R5 and R2.5 within:**
  - ¼ mile of centers;
  - ¼ mile of corridors with 15-minute bus service;
  - ¼ mile of MAX stations;
  - Inner ring districts; and/or
  - Higher opportunity housing areas (with services, amenities, jobs, schools, parks).
- **Reduce the new 'a' overlay based on infrastructure and environmental constraints and in areas with vulnerable populations at risk of displacement.**
- **Expand the new 'a' overlay based on proximity to amenities, such as community centers, parks, schools and multiple bus lines.**
- **Remove the existing 'a' overlay (Alternative Design Density overlay zone) from all properties. Delete the current 'a' overlay zoning code provisions.**

For general comments about the 'a' overlay and the reactions to the methodology used to map it, see subsection "Mapping the 'a' overlay" above.

Some commenters observed that the overlay was applied to much of the eastside but did not apply as broadly to the west side.

- *Why not encourage multi-housing/more density in areas that are run-down or only apartments? What about the west side? The west side--Burlingame, Cedar Hills, Terwilliger for example--have huge lots with houses that don't maximize density opportunities.*
- *Either change the whole city or not at all. Portland needs to all be part of the solution instead of the Eastside having to change out of proportion to the west side.*

Several commenters expressed concerns about specific locations:

- *I live in Cully at [redacted] ne 72nd ave. My house is very close to transit, next door to commercially zoned property, basically across the street from homes that are in the overlay, and yet still we are excluded. My understanding is this means we will get the reduction in what we are allowed to do with our land that comes with the RIP changes but not the benefits that come with the overlay. My view is that all of Cully should be included in the overlay if the RIP moves forward.*
- *Most larger sites are east of 102nd Ave. this is most logical area to promote smart development of sites and make changes to encourage additional amenities to become more available like grocery stores, transit access, businesses bringing more jobs need to be encouraged in these areas.*
- *This is not great in Homestead neighborhood: despite the fact that we are immediately adjacent to Barbur (which has frequent transit) the hills in our neighborhood are very steep, and our neighborhood has NO services, supermarkets, restaurants, etc. So it really is impossible for any elderly people or single families with kids to go shopping without a car, and topography has made garages impossible on several properties. Since this overlay also can allow development without parking provisions, the increased density without parking would make our neighborhood*

*unlivable except for the very strong and healthy, who could walk several miles with a few bags of groceries a few times a week, or have all of their food delivered. This overlay needs to be adjusted to consider topography or the no-off-street-parking exemption needs to be removed from our neighborhood*

- *Here is my testimony/comments for the RIP project as it pertains to my dead end block of SE Henry Street. This dead end block should be ineligible for the Housing Opportunity Overlay because it does not meet the Fire Code or the Right of Way Code for the City of Portland.*
- *in anticipation of the region's next light rail line - please also consider adding the overlay along the Southwest Corridor.*
- *On the map, South Burlingame appears to be adjacent to major roads. However, due to the topography, the access to the neighborhood is limited.*
- *there are two elementary schools on Prescott, Harvey Scott and Rigler. We need more affordable housing and rental units surrounding these two elementary schools, not fewer!! Leaving off prime, buildable lots would be, in my opinion, a mistake. One last point, Prescott is a main bus line. With the schools, and a main bus line, let's utilize all of those big lots north of Prescott to build affordable housing.*
- *Smith would be a perfect street for something like cottage clusters. So would parts of the residential fabric off of Fessenden.*
- *While some of the new areas being rezoned follow your guidelines of selecting lots very near services, amenities or those that adjoin higher density zones, that is not true for the several blocks from NE33rd to NE 35th Avenue from about Siskiyou to Morris Streets and the blocks from NE 32nd Avenue to NE 33rd Ave from Morris to Stanton. These are smack in the middle of a large R5 zoned area, not near any high density zone, and not adjacent or near services such as the proposed areas near 42nd and Fremont or much further north on 33rd.*
- *It is not clear how you are determining high frequency public transport in South Burlingame as we do not have bus service on weekends. Our proximal bus service limited service runs M-F, about 6:20AM-7:20PM, running about every 50 minutes. More frequent service is nearly a one mile walk up steep hills. It is not practical to use as sole transportation, nor is it practical for anyone who has any disability of ambulation which may not reach ADA criteria, but are increasingly common as one ages. Reaching services on foot is challenging in this neighborhood as the grocery store from my house is 0.5 miles, without sidewalks and over roughly paved roads that are plagued by increasingly fast traffic as people use the neighborhood streets to avoid the traffic lights.*

## **7. Provide incentives for affordable housing and historic preservation (new 'a' overlay zone).**

- **Allow one bonus unit if all units are affordable (up to 80 percent of median family income).**
- **Promote preservation of historic resources when adding units through incentives such as waived parking requirements, additional FAR and flexibility in housing types.**

Most comments in response to Proposal 7 are covered in the “Key Themes” sections regarding “Affordability” and “Historic Preservation” above.

However, one commenter expressed a general concern about both the affordability and historic preservation incentives:

- *this seems like a good proposal, but it does add another layer of complexity. It means that only larger developers with the resources to navigate the complexity will build these.*

## **8. Encourage more cottage cluster development (all single-dwelling zones).**

- **Continue allowing multiple houses to be built on a site through a Planned Development Review, but allow an ADU to be built with each house.**
- **Require at least half of the units in a cottage cluster development to be oriented around a common open space.**
- **Reduce the procedure type for some Planned Developments from Type III to Type IIx.**

Following general support for the cottage cluster concepts during previous rounds of outreach, commenters this time focused on more specific feedback based on the specific proposals in the Discussion Draft.

### ***Comments related to house size, FAR, & lot size***

Some commenters desired a greater allowed FAR or density bonuses for smaller units:

- *This is actually a good idea, as long as the main house of each house/ADU pair is allowed to be a comparable size to what would otherwise be allowed on individual lots. If houses in cottage clusters are limited to something like 1200sf, then the incentive to build them is vastly reduced.*
- *If there is serious interest in cottage courts, why is the FAR so low?*
- *More could be done to encourage planned developments. I would like to see allowances for even greater density and make the procedure less onerous.*
- *A density bonus should be allowed if smaller houses are built. Craft regulations that allow these by right, rather than requiring a Planned Development Review. Allow subdivision so that houses can be sold fee-simple. The Cottage Cluster allowances should be structured to allow more units in such “Clusters” than would be allowed in the base zone.*
- *Adopt a genuine cottage cluster code – which provides a density bonus for smaller homes allowing either via a planned development or a subdivision. Density calculations should be performed before subtracting land area lost to Right-of-Way dedications.*
- *I also strongly support Portland for Everyone's recommendations for cottage clusters allowing density bonuses for small units (when people have shared amenities they don't need as much private space) and a density bonus for accessibility.*

### ***Comments related to unit orientation & site design***

Some commenters did not want to see orientation requirements:

- *No new requirements are necessary and especially regarding open space*
- *Don't make any design or layout requirements. If you want to incentivize these, remove restrictions, don't add new ones.*

- *Please do not require units in a cottage cluster development to be oriented around a common open space.*
- *This makes more sense, although the orientation rule seems arbitrary. Light is often an issue in the NW, so it makes sense to orient units for maximum sunshine, rather than enclosing them around a common area.*
- *nix bullet two, leave design to developers*
- *Bullet 2 is still design control, even though its a nice idea. Incentivize it instead of requiring it.*

However, other commenters supported or wanted stronger regulations for orientation and site design:

- *These need more guidelines. All units need to be centered around a central space*
- *Clusters shouldn't have to face a certain way, but they should compliment each other and their context.*
- *At least one unit should face the street.*
- *YES and also: Draw on cluster codes successfully implemented in other places<sup>2</sup> with key features like reduced home sizes, homes oriented toward shared courtyards, and parking located toward the periphery (if any). Allow, by right, cottage cluster developments that meet these rules.*
- *Make 33.854.310 F.2. "50% of homes face open area apply to cottage clusters receiving a density bonus for smaller homes, but not to every PD that includes detached single dwelling units."*
- *Cluster developments must be oriented to the street at public space as well as towards internal shared space. Development needs to protect the neighboring properties' access to sunlight and privacy.*

### **Comments related to house form or housing types**

Some people do not want an ADU to be allowed with each house. Other commenters want to see other housing forms in cottage cluster developments:

- *Please allow attached/row houses in cottage cluster developments, which typically further restrict floor area or height of each unit. Please make this easy enough that it will be taken advantage of, and that it won't be too hard for residents to have fee-simple ownership of their units.*
- *Attached ADU only. Again, please go for the real GHG reductions*
- *Allow a second ADU per home in exchange for a visitability requirement, consistent with staff's proposal for the 'a' overlay.*
- *The cottage cluster senario needs more development. Single story, no basement (ie true cottage cluster) and examination in the unit mix that makes for a better living senario.*
- *Clusters could be helpful ONLY IF they are in keeping with the neighborhood character and preference is given for 1 or 1 1/2 storey homes designed for (older) people who need/want to downsize, need fewer steps, etc. but don't want to live in apartments.*

### **Comments related to the approval process**

Some people want design review for cluster proposals, and some commenters do not want a change in review type:

- *Until residents have more control over aesthetics and quality of materials, I can't support this, even with the laudable requirement for common space. Type III to Type IIx seems to be aimed at limiting dissent.*
- *No reduction in procedure for clusters and add a cap of how many of these per neighborhood- would love to see some of these in lawyer rich neighborhoods of NW and SW*
- *keep Type 3*
- *It seems the difference between IIx and III is that a hearing is held in III but not IIx. I don't want to stop holding hearings for any developments that already require them. In-person public comment is important.*

Several commenters suggested an easier, faster, reduced, or different review process:

- *reduce review time to a maximum of 45 days.*
- *Wonderful, especially the ADU allowance and Type IIx process. It is too expensive and cumbersome to do cottage clusters now. Perhaps a pathway for reduction in fees or process for affordable cottage clusters? (If all units were at 80% MFI max.) Consider a scale for fees based on project size.*
- *should be allowed outright without having to go through PD review, which is more costly and time consuming and likely would lead to a more expensive housing option. If several smaller structures can meet the base zone standards (setbacks, outdoor space, FAR, etc.) then let them be developed without a PD.*
- *WE NEED MORE OF THESE IN EVERY SINGLE QUADRANT. Reduce the procedure type to the smallest possible so these affordable, dense housing models can be recreated at a blinding pace for a gentle density opportunity.*
- *Provide two paths for cottage cluster development. 1) Mix of primary homes and accessory dwelling units through a PD process: Allow an internal and detached ADU in the "a" overlay or a single ADU (internal or detached) outside the "a" overlay; at least 50% of homes must face onto common landscaped open space that includes at least 400 square feet of grassy area, play area, or dedicated gardening space, which must be at least 15 feet wide at its narrowest dimension; cap building coverage at the greater of Table 110-4 or 35% of site area. 2) More traditional cottage cluster option: Allow double the base zone density, subject to homes no larger than 1,200sf; Max height: 25'; Base code provisions apply for setbacks, property line fencing, FAR, off-street parking. Building coverage capped at greater of Table 110-4 or 35%; Exempt 1 pre-existing home (built before \_\_\_\_ ) per cottage cluster from the 1,200sf size cap and 25' height limit, so long as the entire cluster complies with the FAR limit and other requirements of the zone and of this title; Max. homes per cluster = 16; At least 50% of homes must face onto common landscaped open space (which could be a common green or within a shared court) that includes at least 400 square feet of grassy area, play area, or dedicated gardening space, which must be at least 15 feet wide at its narrowest dimension; Accessory dwelling units shall not be permitted in cottage cluster developments; Allow cottage clusters to include 1 and/or 2-unit buildings; A "common house" detached, covered, accessory structure in a cottage cluster containing shared kitchen facilities and guest bedroom(s) would be permitted so long as it falls within overall FAR, height, setback and building coverage limits for the site. Such a building would not count towards the maximum allowed density so long as a covenant is recorded against the property stating that the structure is not a legal dwelling unit and will not be used as*

*a primary dwelling; and Don't layer on additional restrictions often associated with cottage cluster codes that rarely, if ever, get used (e.g. min. covered porch areas, design restrictions, fences, ...). 2a) Single lot cottage cluster through a Planned Development (Type Ix PD process for: Lots less than or equal to 15,000sf; Preserves an existing home; and Doesn't take advantage of the density bonus portion of the cottage cluster code. 2b) Subdivision cottage cluster: Type Ix, IIx or III procedure based on thresholds applicable to subdivisions or partitions of the same number of lots; and Compatible with Common Greens or Shared Courts (see 33.654)*

### **Other suggestions & ideas**

Some commenters made suggestions to augment the proposals in the Discussion Draft or brought up other issues:

- *I do think the environmental stipulations could be made to be stronger. I.e. all mature trees greater than 12 inches dba are to be preserved outright.*
- *Encourage land-trust model for land ownership to encourage true community, use of shared amenities and garages, and ensure long term affordability.*
- *I'd also recommend eliminating parking minimums.*
- *Allow a subdivision approach for cottage clusters to enable fee-simple ownership.*
- *How would cottage development affect sewage flow vs large multifamily complex? Would one be more or less impactful than the other?*
- *continue to develop the specifications for Planned Developments for R10+ properties that optimizes density and green space. A current R10 lot may not have the size or configuration for a cottage cluster development. In these cases, the property may be development with minimal density (1 house + 1 ADU); or the property may be divided into two R5 lots with a maximum density of two houses and two ADU's (or four ADU's if included in the 'a' overlay). The first option may maintain some green space, but may result in the building of a larger house + ADU and smaller yard. We would like to see some middle ground. It would be nice to have Planned Development configurations that work on smaller or more challenging R10 lots . From example, a Planned Development that could includes a house (2500SF max) + 2 external ADU's + XXX SF green space.*
- *Allow properties with ADUs to host Type B home occupations and strike the limit on the number of residents in primary dwelling + ADU combinations. Make whatever modifications may be required to Title 33 to allow for legal occupation of tiny homes on residential lots acknowledging that other changes would also be required to the Property Maintenance code.*
- *Definitely maximize this potential. Apply incentives for this model in areas where land utilization is low and existing structures need more love. Require affordability to allow higher density clusters and allow for two-level duplex arrangements within clusters.*
- *10000 sq feet [lot] is too small for a cottage cluster*
- *With cottage clusters, the only option on the table in the Discussion Draft [for homeownership through a condominium arrangement] relies on builders being willing and able to navigate both a planned development land use process and condominium ownership. Although this is technically possible and might occasionally happen, we should recognize that nearly most cottage cluster or 'pocket neighborhood' developed elsewhere in the US are legally subdivisions, with lots owned fee simple by residents. To adopt a cottage code that excludes this portion of the broader building community would be quite short-sighted.*

- *For PDs where multiple homes will share a single lot, provide an alternative maximum building coverage that is the greater of Table 110-4 or 35% of lot area. Otherwise, adjustments are almost always needed (and granted) in these situations.*
- *If 'accessible route' means ADA-accessible, this could be a problem for internal circulation on larger sites. Requiring the main path to meet this standard is reasonable. But sometimes it's not practical to connect the main path to each front door without exceeding 5% grade, even on fairly flat sites.*

### **General support & desire for a proposal that goes further**

Several commenters wanted a "true" cottage cluster code or stronger code provisions than proposed:

- *You can and should do more to facilitate a true cottage cluster code. This is a far cry from the original proposal.*
- *I just read this article: <https://medium.com/@pdx4all/cottage-clusters-portlands-chance-to-build-community-in-a-new-way-7c504c5b260b> I would like to see a full cottage zoning option as I am looking to move into such a community.*
- *Create a true cottage cluster code that will encourage the development of smaller, more affordable homes.*
- *A true cottage cluster code should be provided with a few clear prescriptive requirements. More, smaller dwelling units should be allowed within a similar FAR what would typically be allowed. There is significant market demand for cottage clusters and serious zoning limitations to their implementation. By not creating a true cottage cluster code BPS is causing undue constraint and missing a serious opportunity to further their mission. As an architect-builder of two cottage cluster developments in Portland (over the course of 5 years). It is clear to me that many more people would develop such housing if they were allowed through a clear specific zoning process, not a PUD. Further, the City should consider ways to make it easier to subdivide ADUs from their parent homes to lower the threshold to homeownership. We live in a time of small households size and we need to give these households more homeownership opportunity for small housing that meets their needs and which they can afford.*
- *My thesis research explored how the layout of intentional communities impacted community relationships and resource sharing. I strongly believe that a strong cottage cluster code will go a long way towards supporting our city's equity and livability goals.*

Some people expressed general support. Here are some examples:

- *Cottage cluster development is a critical component to affordable housing and creating housing that will allow elderly populations segments to live in community. So important to quality of life.*
- *Sounds good to me! My neighborhood association will most certainly write a letter against this, but I think it is a good idea. It will provide more allowances for tree and habitat preservation and make way for a diversity of housing types.*
- *This is critical for an aging population!*
- *I think this would be a great middle income choice for Portland. It embodies a sustainable, attainable model that seems to be a great fit with the both the Portland mindset and affordable housing shortage. I think if this sort of development is codified and incentivized, the cost of developing it will go down.*

- *Please consider making Cottage Clusters a higher priority in the next draft of the RIP.*

### **Opposition to the proposal**

Some people opposed the concept of cottage clusters in general, while others opposed certain features of cottage clusters or the proposals.

Two commenters were concerned about cottage clusters turning their back to the street:

- *Waverly Commons, which presumably is an example of this, has had a substantial negative impact on the surrounding neighborhood as it is treated by residents as a private, walled development with no effort to become involved with the previously very friendly, livable neighborhood.*
- *Many successful examples of this within the City where the street facing buildings address the street with entries reflecting the 'across the street homes' and maintain the character of the street...[but] The mini-neighborhoods create a sense community with the residents within, but leave the remaining street facing single family homes out, detracting from the overall sense of community that 'front doors on the street' create.*

Several people simply opposed the concept of cottage clusters:

- *Not a fan of cluster communities. They seem out of place, separated from the rest of neighborhoods.*
- *This encourages noise (partying on the common lawn). With stricter noise ordinances to compensate, fine.*
- *The challenge with these is that they form 'mini neighborhoods' confusing navigation for fire and police vehicles.*
- *Building ADUs with each additional house on tiny lots leads to less greenspace. Do not destroy traditional neighborhoods for experimental design.*
- *Cottage clusters are the least efficient building typology for our housing crisis. If we cant maintain the people & lifestyle of our city, the "cute factor" will mean very little. No matter how cute the cottage, if it rents for \$10000 a month to a tech mogul, it stops being cute.*

## NARROW LOTS

### 9. Rezone some historically narrow lots from R5 to R2.5.

- In the 'a' overlay, rezone historically narrow lots that have the highest access to amenities from R5 to R2.5.
- For the remaining historically narrow lots zoned R5 citywide, do not allow development unless the lot meets the minimum dimension standards for the R5 zone – 3,000 square feet and 36 feet wide.

Comments about affordability and narrow lot development are covered in the subsection titled “Narrow lots as affordable options” above.

As reflected in prior rounds of public input, some people want many or all narrow lots rezoned (“Please rezone all these properties to R2.5, everywhere in the city”), while others want few or none (“Do not rezone R5 to R2.5”). Many who opposed proposed rezones cited demolition concerns and changes to neighborhood character. Most people who supported narrow lot rezones cited affordability and housing supply as their reasons (see “Affordability” theme above), but one person also cited complexity for small developers:

- *I think the changes should be applied to all of the R5 zones. Every time you add a layer of complexity you discourage incremental development by small owner-occupiers*

Some people want more narrow lots rezoned than currently proposed. Here is a suggestion:

- *I support this, and rezoning all narrow lots to R2.5 within 1/4 mile of 15 minute buses and light rail stations.*

Some people want fewer or different narrow lots rezoned than currently proposed. Here is a suggestion:

- *The advisability of rezoning narrow lots from R5 to R2.5 depends on the neighborhood context. If the neighborhood is already that dense, go ahead. If not, don't do it.*

Several people had feedback about specific locations that were proposed for rezoning:

- *I like and agree with this change, and would actually encourage you to think about expanding this. I checked on the rezoning in Mt. Scott-Arleta area, and it seems that a subset of the newly rezoned area will not be rezoned from R5 to R2.5, when I believe that it should be for population density purposes.*
- *Generally agree with this, but I am concerned with some of the areas that have been designated to be rezoned. For example, I live at N Boston Avenue near N Rosa Parks, and the pocket of my neighborhood is marked for re-zoning, creating an island of R2.5. There is no reason for this, considering the blocks adjacent to Chief Joseph Elementary and Arbor Lodge Park are remaining R5. The same can be said for other blocks neighboring Rosa Parks.*
- *Given your principles of trying to increase density close to services and already built-up areas, I don't see why you proposed two fairly small areas for increased density. The area from the SE corner of N.E. Siskiyou Street and 33rd Ave. NE extending two blocks east to NE 35th Avenue; and then south for one block along the west side of 35th Avenue NE to the north side of NE*

*Morris Street; and then west two blocks to 33rd Avenue NE; then back north to the starting point (phew!) is overwhelmingly owner-occupied detached single-family homes. It isn't anywhere near the commercial and 4-5 story apartment complexes along NE Fremont Street or the very large complex at 33rd Avenue NE and NE Broadway Street. Similarly the proposed area just across 33rd Avenue NE along part of 32nd Place NE and 32nd Avenue NE south of NE Siskiyou Street and north of NE Stanton is filled with higher-end homes. Neither area is what I would call 'close' to your stated services. I just don't see where the two small areas, especially when contrasted to the much large areas throughout the city proposed for the new 'a' overlay, have all that much in common with them except for a Portland address.*

Some people offered other ideas:

- *Rezone R5 lots to R1, or require redevelopment as "cottage cluster" lot (ditch R2.5 entirely)*
- *Allow housing on all 25 ft + narrow lots in all SF zones, unless there is an environmental constraint.*
- *Do not require narrow lots to be rezoned from R5 to R2.5 Allow narrow lots to be built on if greater than 30 feet wide. Require all unbuildable lots to be turned into Open Space or Parks.*
- *I don't think R5 should allow a minimum of 3,000 sf, but rather a minimum of 4,000 sf.*
- *Instead of rezoning historically platted narrow lots to R2.5 develop a menu of incentives for the property owners to rezone these lots when they are sold.*

While others questioned why staff was proposing the rezones, contrary to City Council's 2016 concept direction to not allow development on narrow lots:

- *Given the Portland City Council's 2016 direction on the RIP at the final December 2016 hearing ... how can the BPS proceed given what seems to me to be a crystal-clear decision by Council not to approve?*

## **10. Revise rules for all narrow lots (less than 36 feet wide).**

- **Require attached houses on lots 25 feet wide or narrower.**
- **Allow attached and detached houses on lots wider than 25 feet.**
- **Limit height of a detached house to 1½ times its width.**

Several people agreed with the attached house requirement, citing positive feelings toward rowhouse development. However, some people did not agree with the attached house requirement:

- *Rather than require attached houses, incentivize this by allowing the builder more sq ft or FAR or units if they do so. Relax height restrictions to allow for higher buildings.*
- *Requiring attached houses on lots 25 feet wide or narrower is a mistake. This would require an HOA - which would add additional financial burden to the potential homebuyer and it would reduce the number of buyers interested in detached houses. I live in a skinny house on a lot that is 25x100 and I would NOT have considered buying my house if it were attached to the neighboring skinny house. You are going to limit the appeal of buying a house on a narrow lot if you do not allow developers to build detached houses! After owning a condo and a townhouse in a prior city, I was ready to finally buy a detached house of my own - and not have to worry about*

*common walls and a monthly HOA fee. If there were only attached houses available in my price range when I was looking to buy, it would have definitely reduced affordable choices for me.*

- *Allow rowhouses if feasible, but allow detached units as well if they are willing to forgo off-street parking*
- *I'd stop short of requiring attached houses on lots less wide than 25', what if one wants to build a small house?*
- *Do you end up with one really long attached house or a long dark 5' side lot? Maybe terrain doesn't allow an attached house.*

Some people disagreed with the proposed height limits:

- *Yes to attached housing, but don't limit the height. Why would you do that?!? Let them all be 4 story brownstones.*
- *Good proposal, but do not limit height unless adjacent homes are single story. 2.5 story row houses with an internal ADU are an ideal land utilization model.*
- *Please do not limit the height of detached houses.*
- *Revise the narrow lot detached house height limit to not 1.5, but 1.6 times its width.*
- *I am 100% against the proposed height limit. I'm assuming going forward, 25' wide lots are in high density zones... we need to maximize the lots in these zones, NOT restrict the potential of them*

Several people commented that restricting detached narrow houses on narrow lots for aesthetic reasons seemed like regulatory overreach. Here are some examples:

- *No to the limits on skinny houses. I get it. People don't like the aesthetic and it's new. Once again. Not the priority here.*
- *Allow all of this, and don't let Amanda Fritz's dislike of skinny houses and interesting options be enough reason to deny potentially THOUSANDS of new housing units that could be built within accessible neighborhoods.*
- *I believe the anti-skinny suggestions such as no garages facing the street, are overbroad and vindictive.*

Some people offered other ideas about narrow lots:

- *Increase rear setbacks to allow for more usable rear yards and protect light and air for neighboring homes.*
- *All of the above; but waive if the building features 2+ units*
- *I would like to see housing design consider the impact on the street - two skinny houses that are attached could have one driveway in the middle for both of them, saving the curb from being so chopped up.*
- *if these tiny lots are to be built on, must be a tiny house (under 1000sf) and/or be on a busy street.*

## 11. Revise rules for parking and garages on all narrow lots (less than 36 feet wide).

- **Allow, but don't require, parking on narrow lots.**
- **Continue disallowing at-grade garages on attached and detached houses less than 22 feet wide, but allow tuck-under garages on all attached houses.**
- **On a lot abutting an alley, require access from the alley when parking is proposed.**

Many people want to require parking; some want tuck-under garages, specifically, to be required on all narrow lots.

Many others want parking requirements to be eliminated (either citywide or in the overlay). See the subsection "Parking impacts on affordability" above.

Several commenters focused on the form of garages:

- *Disallow street-facing garages (or require substantial setback) [on all lots]*
- *I would allow at-grade garages but give a additional FAR for basements and tuck under garages.*
- *I think I get the aesthetic issue with garages, though it still seems subjective and what about garages that aren't out front (say behind the house). Seems like they should still be allowed to be at-grade.*
- *If someone wants a garage at grade, let them do so regardless of lot width.*
- *if tuck under garages are allowed, include that floor area in FAR calculations.*
- *Tuck-unders just result in a taller skinny house. How about banning garages on skinny houses? On street parking for one car is equivalent to the width of a driveway.*
- *Tuck-under garages on every attached housing cut lead to excessive curb cuts.*
- *Not sure that is best long term requirement as it would add to construction costs which adds to buying costs. Also any requiredsjb grade design has highest risk of future issues based on living in NW with so much rain and water management issues*
- *At-grade, tuck-under, who cares? Either way, they are both garages that have driveways that provide minimal off street parking in exchange for disrupting the curb line, street trees, street parking, etc. I would take things a step further and not allow parking on narrow lots, unless access is taken from an alley.*
- *The tuck-under garage exception: This is proposed for attached houses on narrow lots. I recommend expanding this standard to apply to detached houses on narrow lots*
- *Please also consider eliminating tuck-under parking that reduces building accessibility, distances porches from the street, increases building height, removes curbside parking spaces, and makes homes more expensive.*
- *[diagram showing tuck-under garage with a car unable to enter it due to the grade of the driveway with notes saying "needs to work for more SUV's" and "this condition needs research for angle of driveway"]*

Commenters expressed both support for and concern about alley parking:

- *Totally support this. I would add that all new infill development of any type on a lot that has abutting alley access should be required to use that access for off-street parking. Do not let people put in new driveways where they do not already exist.*

- *Agree. Add in some mechanism for LIDs to improve alleys. Allow gravel surface as sufficient for alleys to be usable.*
- *Why do we add parking stock in alleys? Alleys are some of the best spaces to improve for pedestrian, play, and gardening uses. Requiring parking access once again prioritizes the storage of private property over people in the public realm. We have thousands of miles of parking already. Can we think of people before cars at some point in Portland?*
- *please consider how requiring alley access might interact with your proposed increased front setback.*
- *On alley access properties - require parking access required, then also require waste and refuse collection on alley.*
- *I'm especially in favor of the required alley access. The difference between a horrible skinny house and a decent one ALWAYS comes down to whether parking is provided. Not providing parking off the front retains on-street parking and uses alleys as they should be.*
- *What if the alley is not maintained or connected through? What about the future of turning alleys into greenways, gardens or pedestrian ways? I like the intent of getting cars out of view from the sidewalk, but it might be missing other opportunities or unforeseen problems.*
- *Not all alleys are drivable. Probably 25% are not realistic to access due to under management by neighbors*
- *+1 alley access, alleys are really underused.*

Some commenters offered other insights and ideas about parking:

- *Have you ever watched a person with a walker or a cane try to navigate the rowhouse area of NW Portland (Thurman, Upshur, etc) ? Having yet one more curb cut for a pedestrian to deal with, one less on-street parking spot and all that extra impervious surface is bad for our salmon and bad for us!*
- *Thanks for not requiring parking. Have you considered requiring multiple cars to share a 1-car-width driveway?*
- *Eliminate parking minimum requirements for all housing and let the private sector decide how much parking is necessary to construct. If this change is not a politically-feasible requirements at this time, consider: 1) the elimination of minimum parking requirements in areas with existing or planned on-street parking permit programs and/or areas in proximity to publicly-available parking lots or garages, and 2) a parking maximum (set relatively low or set to 0) for areas within 500 feet of MAX and/or frequent bus.*
- *One change suggested would be to make the narrow lot threshold higher than the proposed 36 feet, to capture a larger share of residential lots in the City where off-street parking requirements would be waived. This threshold could be raised to 50 feet. Include: Existing required parking must be maintained or replaced on-site spaces may be redeveloped for new housing if two or more on-site trees greater than or equal to twelve inches in diameter are preserved. Make fourplexes eligible for new off-street parking standards.*

## 12. Make improvements to the R2.5 zone.

- **Require at least two units when new development is proposed on a 5,000-square-foot lot or larger.**
- **For land divisions, reduce the minimum lot width from 36 to 25 feet.**
- **Allow property lines to be adjusted to create a small flag lot (less than 3,000 square feet) when a house is retained.**
- **Create rules for small flag lots that restrict the size of the new house to 1,000 square feet and the height to 20 feet, and require exterior design elements.**

Some people did not support the requirement for two units on a double-sized lot in R2.5. Here are some examples:

- *Once again, the 'require at least two units' is too strict/one-size-fits all*
- *Requiring two units for R2.5 would not be good if it paired with historically narrow lots. Land divisions should stay at 36 feet. Less than 3000 sq ft would make for no yards 1,000 sq ft house on small flag lots at 20 feet sound ok. If these were paired with keeping the overlay at 1/8 of a mile from city centers then I would be for them but not if they cover most of the city. ( 1/4 mile )*
- *Support except for mandatory number of units. Increasing options and then letting the market decide is the way to go.*
- *Requiring 2 units on a 5000+ sq foot lot is going to destroy green space within the city. There is already so much incentive to redevelop.*

Other people supported the two-unit requirement and called for more minimum density requirements:

- *I disagree with allowing the requirement to be met with an ADU, which can just turn into an office for the house owners. The city should require two rowhouses or a duplex. Perhaps this could be implemented with a requirement that the smaller of the two units be no less than 80% the size of the other unit.*
- *Yes. I think we need more min density rules in these zones. Why not also consider some min density requirements in other zones like R5?'*
- *This should be the requirement on R5 as well. The city does not need any more single-home lots.*
- *A requirement for 2 units is insufficient. For large lots there should be a FAR-based policy and a requirement for minimum number of units (e.g. 3 for a 5000 square foot lot).*
- *Allow four-plexes on each 2500 sq ft lot.*
- *Eliminate minimum lot width, minimum lot area. Set the max FAR at 1.0 if you are afraid people will build too much housing during a housing shortage.*
- *I support the density provision to requires two units or more on 5,000 sq ft lots or larger. The reduction of minimum lot width from 36 to 25 feet is really important for encouraging density.*
- *Density is good. Increase R2.5 density to 6 - 8 units.*
- *Consider applying minimum density to R5 as well (e.g. not just to R2.5) so people can't do a 1-for-1 replacement of a house on a 100'x100' lot within R5. Consider loosening lot remnant standards area to be developable.*

Some people did not support reducing minimum lot width. However, one person wanted lot widths to be reduced further:

- *I would suggest the minimum 25' lot width be reduced to 22', so that the common 45' (and also 44') lot widths in many older subdivisions will allow for lot splits, for attached rowhouses to be built.*

Several commenters suggested allowing larger sizes for flag lot houses:

- *Ok. How about 1500 sf for new house and regular height limit?*
- *Restrict size for small flag lots with new house to 1,250 square feet.*
- *20 feet is too low, especially on sloping sites. 25 feet would allow for more flexibility.*
- *Allow for flag lots; do not limit size on flag lots*
- *all new housing should follow the same rules. No 1000sf area limits or 20' height limits. Just have one set of rules for all houses.*
- *1000 square feet is too small for a "house". I would accept 1,250.*
- *I support all this except the last point, limiting the new house to 1000sf. You are limiting opportunities for families at this size. It would be more appropriate to limit the size to between 1500 and 2000sf. That house will actually cost less per square foot than the 1000sf house and be more useful to more types of people than a 1000sf house.*
- *Sounds good, except, 1,000 sq ft is small! how about 1600 sq ft?*
- *Just allow small flag lots to build big houses.*
- *again, why restrict and therefore limit the potential of any available lots we have left. I don't understand this logic. Unless you're going to significantly reduce the cost of permits, I don't see a lot of these developments occurring because they do not make economic sense, they wouldn't pencil out.*
- *Restrict rear yard house height to 22 feet.*

Several other commenters had ideas about flag lot development:

- *introduce cap of how many flag lots are allowed per year per neighborhood.*
- *To the last point with small flag lots, instead of setting a maximum square foot size simply set an FAR ratio - this allows for the same type of constraint but customizes size for different sized flag lots.*
- *Please do not create new rules for small flag lots.*
- *Why should flag lot house have to match original house? there are many parts of town where original house is nothing special aesthetically, and a new small house in back could look much nicer with more options*
- *I support this change except requiring exterior design elements for small flag lot homes. This goes to far in limiting homeowners rights.*
- *Allow creation of a flag lot to meet density standards when the shell of the existing house is preserved with minor modifications allowed.*
- *In the mini-flag lot code, provide an exception to the 5' setback for property edges abutting alleys.*
- *Where no parking is required on site, reduce minimum flag pole width to 3' or 5'. Many existing houses would be built up to 5' set back. There is plenty of room for access to flag portion of lot and may be better aesthetically than large empty pole. Fire access would still have to be met, 150' to furthest point on structure.*

Several commenters offered other ideas about R2.5 provisions:

- *Perhaps incorporate solar protection requirements??*
- *I've always thought that if you can have multiple units on an R2.5 lot, you should be able to stack them, not be restricted to side-by-side options.*
- *Replace the R2.5 zone with a "cottage cluster" zone - Disallow parking in R2.5 zone*
- *Require two detached units*
- *YES!! More flag lots and dividable lots. Let mid and small developers have full creativity regarding how FAR is achieved on awkward/different parcels.*
- *Yes, and create incentives to encourage a third unit. If larger than 5,000 sq. ft., allow additional units.*
- *Tree protection on R2.5 lots previous R5 with lg trees? Flexible building area to save trees [with arrow pointing to diagram] Add drip zone square feet to F.A.R. allowed in houses*

## Letters from Organizations

Staff received letters from **46 organizations** – groups representing more than one person, which included nonprofits and advocacy groups, public-sector agencies and commissions, coalitions of for-profit housing developers, business interests, and neighborhood associations and district coalitions. Feedback from each group is summarized below. This section is an overview, and the full text of the letters received can be found in Appendix D.

### **Nonprofits & advocacy groups**

**Eighteen nonprofit organizations and advocacy groups** submitted letters. Six letters came from housing-focused advocacy groups or nonprofit housing developers, five came from groups focused on age- and ability-friendliness, three came from groups focused on historic preservation, and four came from other groups.

#### ***Housing***

The six letters from advocacy groups and nonprofit housing developers expressed support for the proposals and suggested changes.

Nonprofit housing developers Portland Community Reinvestment Initiative, Rose Community Development, Proud Ground, and Habitat for Humanity suggested changes such as applying the housing opportunity provisions everywhere, allowing additional FAR for multiple units, allowing mid-block duplex and triplex lots to be divided, reducing the minimum lot size for family-sized units, and adjusting the visitability requirements. They also suggested adjustments to the affordability bonus, including allowing a bonus unit if one unit is affordable, providing additional FAR and increasing the income cap for family-sized affordable units, and pairing the bonus with other tools.

Housing advocacy groups Portland for Everyone and Anti-Displacement PDX wrote in support and suggested changes such as expanding the housing opportunity and internal conversion provisions everywhere, waiving parking requirements near transit, revising the cottage cluster code, and rezoning all narrow lots. They also suggested alternatives to excluding the areas identified by the displacement risk analysis from the ‘a’ overlay, such as methods to require developers to contribute to affordable housing when building an additional unit, allocating funds to acquire property for affordable housing, lowering the threshold for the affordability bonus, and incentivizing below-market-rate rentals through transfer of development rights, property tax abatements, SDC waivers, and subsidized home repairs.

#### ***Age- and ability-friendliness***

The five letters from groups focused on issues of aging, disability, and accessibility, which included AARP, Age-Friendly Portland and Multnomah County, the Portland Commission on Disability, Unlimited Choices, and the Real Choice Initiative, expressed support for the proposals and suggested changes. Some suggested a zero-step entry for visitability, incentivizing stacked flats over side-by-side units, and adding visitability provisions to the cottage cluster proposal. One group urged the proposal to go further by requiring Universal Federal Accessibility Standards and maintaining an accessible housing inventory.

#### ***Historic preservation***

The three letters from groups focused on historic preservation, which included the National Trust for Historic Preservation, the Portland Coalition for Historic Resources, and Restore Oregon, supported the historic preservation related proposals but expressed concern. They suggested alternative ideas for

incentivizing preservation such as allowing two detached ADUs to be attached to each other as well as revisions to the code such as prohibiting alterations to street-facing facades. Some expressed concerns outside the project scope, like the outdated Historic Resources Inventory and the effectiveness of other preservation tools. The Portland Historic Landmarks Commission also submitted a letter (see Agencies and Commissions, below)

### ***Other advocates***

Three other nonprofit or advocacy groups submitted letters – United Neighborhoods for Reform (UNR), the Audubon Society, and Oregon Walks. UNR, a neighborhood organization concerned about demolition, supported some scale provisions but suggested refining height measurements, contracting the ‘a’ overlay, testing a pilot area, clearer standards for cottage clusters, and not rezoning to R2.5. The Audubon Society suggested either removing the proposal to increase the front setback or allowing a reduction in front setback to save a tree greater than 12 inches in diameter in the backyard, as well as removing the small lot exemption from the tree preservation requirements in Title 11. Oregon Walks supported the provisions related to design and parking but expressed concern that the FAR allowances are too restrictive for multiple units and that the affordability bonus is too restrictive. They suggested allowing internal conversions everywhere, creating a true cottage cluster code, and rezoning all narrow lots to R2.5.

In addition, a group called the RIPSAC 7, which is comprised of seven members of the project’s Stakeholder Advisory Committee, advised project staff to address scale based on neighborhood characteristics, stop recognizing certain historic underlying lot lines across the city, place density around centers and corridors, and avoid using an overlay zone.

### **Agencies & commissions**

During the development of the Discussion Draft, project staff worked with and briefed other public-sector agencies and commissions. Five public-agencies or commissions submitted letters.

The Design Commission, which reviews certain development proposals in the City’s design overlay zone, supported the proposals but expressed concern about overly restrictive floor area ratio (FAR) and height allowances, garage form, and the proper parking requirements for projects getting a bonus unit for affordable housing. The Historic Landmarks Commission, which stewards the city’s historic resources, expressed concerns about neighborhood compatibility and house form and urged for more flexibility and incentives for homes more than 50 years old. The Urban Forestry Commission, which advocates for the city’s urban forest and tree-related issues, suggested changes to setbacks, structure configurations, and the required outdoor area standard to grow and preserve tree canopy.

Metro and TriMet supported the additional housing type proposals and suggested greater integration with the transit system, such as adding the upcoming Powell-Division Bus Rapid Transit line to the ‘a’ overlay and increasing the transit buffers used to build the ‘a’ overlay to ⅓ mile for frequent bus and ½ mile for max stations.

### **Housing developers**

Two groups of housing developers that work on small-scale middle housing projects, the Build Small Coalition and the Portland Small Developer Alliance, submitted letters in support and suggested changes such as applying the housing opportunity provisions everywhere instead of in an overlay zone, refining

the FAR allowances, changing the affordability requirements, and removing barriers to ADU and cottage cluster development.

Another group of homebuilders wrote in support and suggested changes to allow more fee-simple homeownership options and refine the cottage cluster proposals.

The Home Builders Association of Metro Portland similarly suggested expanding the housing opportunity provisions everywhere and urged for more flexibility, more generous FAR allowances for middle housing types, and other changes.

### **Business interests**

One business and one business association submitted letters. Green Hammer, which specializes in net zero energy and Passive House buildings, suggested measuring FAR in a way that does not discourage energy-efficient well-insulated walls and roofs, encouraging more units for internal conversions, and greater density citywide. Business for a Better Portland urged staff to revise the affordability bonus, citing the difficulty finding housing among employees making up to 120 percent of median family income.

### **Neighborhood associations & district coalitions**

Two district coalitions, Northeast Coalition of Neighbors (NECN) and Southwest Neighborhoods, Inc. (SWNI) submitted letters. NECN wrote in support and suggested an increase in FAR for buildings with three or more units, removing the visitability requirements, and running the displacement risk analysis to the ½-mile radius around the upcoming Powell-Division Bus Rapid Transit line and the Southwest Corridor light rail line. SWNI wrote in opposition and cited concerns about demolition, affordability, loss of homeownership, parking, infrastructure, and other topics.

Seventeen neighborhood associations representing the neighborhoods of Beaumont-Wilshire, Concordia, Cully, Collins View, Goose Hollow, Hayhurst, Hosford-Abernethy, Laurelhurst, Mt. Tabor, Multnomah, Powellhurst-Gilbert, Rose City Park, Roseway, Sellwood-Moreland, South Burlingame, St. Johns, and University Park wrote letters ranging from support to opposition. Common themes included concerns about demolitions, affordability, FAR allowances, infrastructure capacity (e.g. unimproved streets, narrow streets, lack of sidewalks, poor transit service, school enrollment) as well as the process of the project in general. However, some neighborhoods wrote that the proposals do not go far enough and suggested expanding the 'a' overlay in order to increase housing opportunity for more Portlanders. Several neighborhoods had concerns about excluding displacement risk areas from the "a" overlay zone and some suggested different affordability requirements for the proposed bonus unit. There were also concerns about the R2.5 rezoning proposals from neighborhoods with a preponderance of historical narrow lots.

# Residential Infill Project Discussion Draft

## **Residential Infill Project Kick-off Meeting**

**Tuesday, Oct 10, 2017**

5:00 – 6:30 reports available, staff available to answer questions

6:30 – 7:30 staff presentation/ Clarifying Q and A

Portland Building, Auditorium

1120 SW 5<sup>th</sup> Avenue

## ***Drop-In Hours***

### **East Portland Drop-In Hours\***

**Wednesday, October 11, 2017**

5:00 – 6:00 pm

East Portland Neighborhood Office (EPNO), 1017 NE 117<sup>th</sup>

\*Project Presentation at EPNO Land Use Committee begins at 6:30 pm

### **Northeast Drop-In Hours**

**Thursday, October 19, 2017**

5:00- 7:00 pm

Northeast Coalition of Neighborhoods (NECN), 4815 NE 7<sup>th</sup>

### **Central Northeast Drop-In Hours**

**Monday, Oct 23, 2017**

5:00 – 7:00 pm

Central Northeast Neighborhoods (CNN), 4415 NE 87<sup>th</sup>

### **Southwest Drop-In Hours**

**Monday, Oct 30, 2017**

5:00 – 7:30 pm

Multnomah Arts Center, 7688 SW Capitol Highway

### **North Drop-In Hours**

**Thursday, Nov 2, 2017**

5:00 – 7:30 pm

Kenton Fire House, 8105 N Brandon

### **Southeast Drop-In Hours**

**Tuesday, Nov. 7, 2017**

5:00-7:30 pm

Southeast Uplift, 3534 SE Main

***Fix-it Fair.*** Come visit our table!

**Saturday November 18, 2017**

9:30 am - 2:30 pm

Ron Russell Middle School, 3955 SE 112<sup>th</sup> Ave, Portland, OR 97266

**District Coalition Land Use/Transportation Committee Meetings**

*These meetings convene the land use chairs from neighborhood associations throughout each district to discuss land use/transportation issues. Meetings are open to the public, but please check with the District Neighborhood Coalition staff for specific time and length on the agenda\**

**Central Northeast Neighbors (CNN)**

4415 NE 87<sup>th</sup>

Thursday, Sept. 14, 2017

7:00\*

CNN Contact: Sandra Lefrancois, 503.823.3156

**East Portland Neighborhood Office (EPNO)**

1017 NE 117<sup>th</sup>

Wednesday, Oct. 11, 2017

6:30\*

EPNO Contact: Linda Bauer, 503.823.4550

**Southeast Uplift (SEUL)**

3534 SE Main

Monday, Oct 16, 2017

7:00\*

SEUL Contact: Leah Fisher, 503.232.0010

**Southwest Neighborhoods, Inc. (SWNI)**

7688 SW Capital Hwy

Tuesday, Oct 17, 2017

7:00\*

SWNI Contact: John Tappero, 503.823.4592

**Northeast Coalition of Neighborhoods (NECN)**

4815 NE 7<sup>th</sup>

Wednesday, October 25, 2017

7:00\*

NECN Contact: Laura Becker, 503.388.5004

**North Portland Neighborhood Services (NPNS)**

8105 N Brandon (Kenton Fire House)

Thursday, Oct. 26, 2017

7:00\*

NPNS Contact: Mary Jaron Kelley, 503.823.4524

# Appendix A: Comment Form Responses

The **3,425 total comments** on the 12 proposals from the **433 respondents** that answered at least one non-demographic question are shown verbatim below.

**1. Limit the size of houses while maintaining flexibility (R7, R5 and R2.5 zones).**

- **Establish a limit on house size by zone that is proportional to lot size using a floor area ratio (FAR) calculation.**
- **Exclude attics with low ceilings and basements from house size limits.**
- **Allow an additional .15 FAR for detached accessory structures (such as garages, sheds and accessory dwelling units).**

While I applaud the goal of avoiding McMansions, the proposed downsizing strikes me as excessive
I think that the limits on house size are a good thing, but I am concerned the proposed limit is set too low.
There is no need for this change, it is not necessary and will only reduce building options, and is excessive and goes too far. Decreasing the size of homes won't really decrease the prices that much. It will just decrease the potential utility of the home and the number of people it can potentially accommodate.
Allow additional FAR for affordable homes
In keeping with the need to have a range of options for houses it would be nice if the size of the houses could be a bit larger. I think a 3,000 sq ft house is not too big for an extended family.
I agree
This approach is all fine and good, and my wife and I appreciate the proposed limitation of size of new construction, but it does not go far enough. New homes under this proposal will STILL be too large, infringing on trees, gardens, and play space for children. Our neighborhood of Multnomah Village is in crisis as demolitions and McMansions destroy character and quality of life, and as longtime residents are forced out. The City needs to make houses still-smaller than in these proposals, and more affordable. We support efforts to increase density, but ONLY IF the City also cracks down on developer-driven construction of McMansions that are hindering the City's stated goals for infill and affordability.
Ok
The proposal appears to show a reduction in R5 zoned house size which is inconsistent with changes for those zoned 7 & 2.5. Not very equitable for owners of those properties.
This is an essential change to current zoning which I support. Presently, too many infill houses nearly completely fill the lot, taking away ground from absorbing rain and runoff, and reducing the green scape necessary for healthy living in our city. I support the FAR proposed for R5, but I am concerned about too generous of a FAR for multi-family units, particularly triplex corner lots. Even those lots need open land surrounding them.
Limits should consider livable spacing including attics and basement space.

This limit affecting my property has not been proposed to me directly. It will interfere with the ability to develop my property in a manner consistent with its zoning at purchase and potential. The use of FAR as a bonus to permit necessary functional items such as garages or sheds does not acknowledge the ongoing importance of housing that functions for its occupants.
Great!
In general this seems like a good idea but I'm not sure if the proposal is too restrictive
I love this idea!
Oppose. First, the market will do a better job than government of figuring out what size houses, in what quantities, best serves the public. Second, even if it's a good idea for government to decide what size houses people can have, it doesn't necessarily follow that the size should depend on the lot size. If you decide no one needs a house bigger than 2,500 square feet (even if they think otherwise), why is that okay on a 5,000 SF lot but not on a 2,500 SF lot? Sure it will result in more lot coverage and/or a taller building, but that might be okay given that smaller lot sizes are likely in higher density areas where taller buildings and more lot coverage makes sense. Third, people need to get over change in the neighborhood. Neighborhoods are always evolving and there is nothing magical about the point on the continuum at which they happened to move in.
you should establish a limit on house size proportional to the lot. you should not exclude attics.
Think there should be a variable when it comes to floor area calculation,like anything I think it should be designed based
FOR -- we need to limit over-development in keeping with livability and space around buildings; if nothing else, containing fires by limiting fire jumps.
Excluding the attics and basements and allowing ADUs defeats the purpose of limiting house sizes.
Limit the amount of housing structures per lot. Crowding lots, using up the all the outdoor space needed for children to play & gardening & just "space to be" is diminishing the desirability of living in Ptlld.
new homes should meet a min. standard - I agree with the above proposals.
Restricting to 2500 ft sq seems overly limiting. I'm not impressed with ADUs in my area, definitely not "affordable" for many renters.
Yes, please limit the size of these new houses! They are completely out of character with the rest of the neighborhood. Building smaller-scale houses would not affect the number of people able to live there.
Agreed. Avoiding gargantuan monstrosities among standard <2,000 sq ft bungalow homes in my historic neighborhood is welcomed.
Limiting the size of apartment buildings is a positive. Making buildings too large with no green space is a negative.
Basements should be included in FAR
I strongly support an FAR limit for primary structures, but suggest an increase in FAR for detached accessory structures from 0.15 to 0.20.
I think this is a step in the right direction. However, I don't see why "low ceiling attics" and basements are excluded from size calculation. I would like to see footprint lock in as well- if you have front and backyard of 800 square feet open space- that must be maintained in any area that is not zoned for heavy traffic apt/condo buildings.
All new houses in my Eastmoreland are built out as far to property line as possible. This is not in keeping with original houses and causes new houses to look out of scale.

The revised FAR limits are very restrictive and do not encourage the creation of houses with additional rental units. ie single family 2000 SF + ADU 800 SF + ADU 800 SF should be allowed on an R5 lot if the goal was really to create more housing.
Interesting; I like this in concept
I think attics should be factored in if they are livable space.
.15 FAR is insufficient for ADUs and other detached structures. For the normal 5000SF lot, 750 SF for an ADU on top of a garage wouldn't work.
I think more FAR should be added for detached accessory structures. I also don't think there should be a limit on house size by zone- this could prevent large 3 or 4 plex houses from being built.
Limiting sizes is ok but approval of this aspect does not mean I endorse the RIP plan and its "so-called" flexibility for middle housing that destroys single family neighborhoods.
I think the proposed FAR limits are a little too low (maybe by .05 each zone), and the proposed FAR bonus for detached accessory structures should be bumped up to .20. People like space and also need room for storage.
Limiting the square footage of homes is a bad idea. People are buying homes because they don't want to live in the ever shrinking condominiums and apartments being built.
Why? What goal is this change trying to achieve?
I think higher FAR should be allowed when there are more units.
Yes, this will enable greater population density in neighborhoods.
I agree, with this item
This section sounds fair
Good
Great
Better then existing
No
This sounds okay, you should also allow duplexes and triplexes and exempt them from the house size limits. It would help increase housing.
How will the FAR affect a PLA? Will this make historic lots unusable, reducing the availability of build-able lots?
NEW HOUSES POPPING UP ALL OVER THE SE & NE ARE OBSCENELY HUGE.
support!
The code should allow owners to replace basements with taller ones equivalent to the current limits. We need to encourage seismic retrofitting, and allowing existing buildings to be preserved while adding space for an ADU would advance our goals.
Maximum height and minimum lot line set backs are preferable to floor area ratio in limiting size of buildings. While RIP recognizes that families sizes are shrinking, speculative development for maximum profit is ruining established neighborhoods with out-of-scale oversized houses blocking views/sun access, shading, with reduced privacy and lack of design cohesion.
I object to reducing zones in R5 to R 2.5 it will destroy the neighborhood, destroy green space, and promote destruction of older homes. Otherwise this seems OK.
Good.
I disagree strongly! This is private property that is expensive people should be able to build a large single family house if they want.

I would like to see the proposed house size limit be increased from what is currently being proposed. I believe we should allow more quadplexes and higher, not fewer. Additionally, I would allow a higher addition for detached structures, and I would allow extra size for units guaranteed to be affordable.
This is great.
Should CONTINUE to include attics with low ceilings and basements in house size limits.
House size limits only make sense if coupled with zoning changes encouraging the subdivision of large lots. Otherwise, this is merely enshrining an aesthetic judgement, something that the City should have no business doing.
I don't understand the point of this proposal - why are you reducing the amount of building that is allowed on a site. I think a per dwelling unit (ADUs included) measurement system would make more sense. Alternatively allowing houses to match the FAR of adjacent properties would be a good change and not lead to strange development in neighborhoods with historically large houses.
Should not apply at all to new additional ADU units on lots.
I like this proposal.
Yes! current builds are dwarfing preexisting homes, they are absurd and destroy any harmony between structures in every neighborhood they land in.
Proposed FAR limit too low considering the percentage of city land in these zones and its use in inner ring as well as far from employment
Allow larger structures IF more units are produced. 2500 is appropriate for single family, but will limit density for house-form multifamily...
I support use of FAR's in these zones. PLEASE make sure that a 1:1 FAR is retained, as currently proposed. I support the allowance of an additional .15 FAR for detached accessory structures. I support not counting attics and basements in FAR as this would allow a basement ADU (assuming you mean habitable basement versus "storage" basement).
no problem here
Very concerned about loss of trees and other greenery. I see so many ADUs filling up people's yards.
I think that this should be based on zoning and existing neighborhood architecture and house sizes. Houses that exceed 2800 sq ft for a single family should be discouraged
Sounds good.
Excellent.
How does this impact existing homes? Example: Person has a 2200 sqft home and wants to make their attic livable space, which would require a dormer and add 600 - 800 sft. - allowed?
I would try to eliminate code that encourages garages. With the inevitable advent of driverless cars, garages will soon become obsolete.
Limiting house size serves the dual roles of not having our inner neighborhoods become McMansions and not using valuable resources unnecessarily.
Please continue to keep SFR in R5 ZONES. Single ADU on a R lot acceptable.
two houses per 50x100 lot is enough
It we are going to give our cutizens what they have been asking for - reasonably sized homes that fit the neighborhoods they are being build in, you should not allow loop holes like excluding "attics" and "accessory units"!
McMansions, skinny houses and snot houses are destroying the beauty of inner SE. This area is known for quality construction around 100 years old. Some homes are crumbling but most are doing great! Keep them!!
Ok

Do not limit houses from having attics or basements
So, here's the thing. I live in a house on a 4500 square foot lot that will be zoned R2.5 as of the upcoming Comp Plan adoption and is in RIP's proposed new "a" overlay. This lot is too small for the mandatory duplex provision to kick in, but would allow for a very substantial amount of FAR on this property--much larger than what would be allowed on a comparable 4500 sq ft R5 lot. It does nothing for the provision of housing to allow larger single-dwelling homes in R2.5 than R5, and it doesn't relate to available infrastructure or any nexus I can identify, but may have the adverse effect of fueling the interest of speculative developers. This seems to be an unintended flaw, and I would suggest pinning FAR more closely to the number of proposed units on a site, with less direct regard to the base zone. Furthermore, I would like to see the provisions allowing additional units tied to actions that will ensure these units are used for long-term housing (ideally affordable housing). It does no good for upper-middle class households (and really only those with access to capital) to be able to bid up the price of single-dwelling homes because of anticipated income from AirBnB, for example. AirBnB rentals are removing housing stock in my neighborhood, and allowing people to buy more housing than they even need with anticipated income, bidding up houses out of reach of other families. Additional units should, at minimum, be conditioned on covenants disallowing ASTRs on site. Ideally, I would like to see units conditioned on the provision of affordable rents, but I do understand that the logistics become more complicated (what if I'm "renting" to grandma for free?), but if there's a way to make it happen, I would support that.
Limit on house size--yes! No exclusions...all square footage should count. Otherwise we'll get the same mansions we're getting now.
Do not exclude basements if they are livable spaces. Do not allow ADU's as they reduce open space and negatively impact neighborhood character and the environment.
Flexibility is key to improve diversity of housing stock
Establishing a limit on house size will likely make homes more affordable. Current infill is giant and expensive.
No, we need green space, yards, trees, gardens more than we need to stuff ADUs in single dwelling zones. Refocus development on vacant land, not established neighborhoods. Home size, height, and setbacks should match existing homes. Residents of modest neighborhoods don't want to be converted to neighborhoods of enormous homes, pricing out current residents.
There needs to be a maximum size EVER granted. An excluded low ceiling attic could easily be raised at some point to a height that would make it incompatible with surrounding homes.
Exclude only basements that are completely below ground, as opposed to houses raised well above street level with the basement/garage as the prominent street level feature.
Seems about right.
recently constructed new homes have grossly exceeded the size of the original demolished dwellings which has a major negative impact on the neighborhood character. Limitations should be set relative to the size of the original dwelling on the lot. ADUs should be limited to the same area currently offered by an existing separate structure (ie garage)
I wish this was better explained right now I'm unsure of what will result. Is the ratio set? Who sets it? Can it change over time or by specific neighborhood?
Uncertain
Don't exclude attics, basements or adu's from the FAR calculation.
Definitely reduce the maximum allowable house size. Proposals seem good. Remain concerned by the lack of specification of distance between lots as well as between houses/accessory units. I'm talking about preservation of "open, green space" on every block, not just in parks!!

Should be proportional to neighborhood and respect solar access for other home owners or offer mitigation for loss of solar access.
New house sizes should be limited to the average existing size in established neighborhoods. New areas of Portland East of 82 should be the focus of new development that is planned and emphasizes public housing along with new houses for the wealthy.
One simple way to reduce demolitions while also increasing the amount of available housing would be to limit the size of new houses to the size of the house that was torn down, unless the new structure includes multiple units.
wrong and unamerican to limit house size on a legal lot. ALSO very wrong to cut current 50x100 lots in half. if there is currently room on a given lot for an adu then fine and if not, too bad.
Agree
Allow extra FAR for extra units (particularly those inside the home itself). Allow homes designed specifically for house sharing to have bonus FAR. Establish a provision granting bonus FAR if house is guaranteed to be rented out for house sharing purposes for X years (similar to inclusionary zoning)
Limit flexibility more, limit size (SF, height and setbacks) to the current average of all houses the block. Include any ADU in this calculation.
approve
The size of the house should be not only proportional to the lot size, but to the other houses in the neighborhood. Otherwise, the sense of neighborhood his lost.
I think the use of FARs is a good approach. It provides flexibility and deals with the identified problem of homes that are out of scale and costly.
Theoretically this might make sense, without the actual proposed FAR it seems unreasonable to ask for meaningful comments.
limiting size sounds good but this is a very technical description. What .15 FAR mean? What does it look like?
What is the proposed ratio?
I think this is a good idea. In our area, there are quite a few large houses that have been squeezed onto small lots.
I think the FAR shouldn't be so restrictive; I don't see the logic of preventing housing from being built on land zoned for housing by low FARs
I agree
2500 - 2700 sq ft homes on 3500 sq ft lots seem to match older homes that were built in the early 1900's on the block. See 4925 N. Princeton
Yes!
Keep zoning as it currently stand!
I agree with limiting housing via FAR. I disagree with the exclusion of attics and basements -- homes being built today are already far too tall in relation to existing housing stock. If you allow additional FAR for detached accessory structures, I would like to see a requirement for street improvements. In our neighborhood we have far too many streets with no sidewalks and the in most cases, new infill is not being required to include sidewalks.
Yes, yes and yes!
FAR should not exceed half the lot. 3000 sq ft homes on small lots should not be allowed.
far doesn't go far enough in multnomah village new mcmansions can look directly into others people's homes there needs to be refs requiring the home fit architecturally with other homes
Excellent ideas. Can't think of a single suggestion to improve it.
Makes sense to use a measure rated to actual lot size.

A 50 x 100 lot in No Po in established neighborhoods should only have 1 major structure (2 stories with up to 9 ft ceilings - say 2,000 sq ft) and one smaller structure and allow for off street parking.
A house size limit based on FAR would be nice, as some of the new construction in our neighborhood is overwhelming (too big) for the lot size. Allowing additional FAR for detached would be really useful.
R5
I assume this is a limits for single-family dwellings? If that's the case, then I don't have a problem with it. But if the city is to grow, we shouldn't limit the size of multi-family properties this way.
Why is this written in complex jargon only City planners can understand? This seems like it's done to make sure you can push through your agenda. What are the implications of this? What does it mean in real life? How will it change the face and character of our neighborhood? Why did you designate only the areas with the cheapest and smallest homes? Why not encourage knocking down the giant homes on the ridge and replacing those with 4-plexes?
I have never understood the pushback in large houses. Lot size is what determines density. Whether a family lives in a small house on a tenth acre lot or large one doesn't really matter to me. I feel like people reject larger houses in principle because they seem 'excessive' but it's not really the problem.
The FAR calculation is fine. Just how big is going to be the question.
Agreed
I commend limiting the size of houses to 2500 sf and townhouses to 1750!
I think that the zoning should allow a variety of house sizes. I do like them being proportional to the lot - new houses often have a little "alley" around them rather than a yard. We need more green space for air quality, distance between houses, water to soak in, etc.
Absolutely limit size. Also require a design that blends in with historical structures if present.
I agree
No limit
I support this recommendation. However, I would build in flexibility to allow slightly large square footage if it is done to accomplish a good goal (tree preservation, housing affordability, especially if the house structure is a duplex or triplex and one or more units is affordable.
Love it!
Garages and sheds should not be included within the .15 FAR. Define low ceilings. Basements should not be fully exempted from the FAR - otherwise the FAR limits are not serious limits.
Include attics and basements above grade
I support these changes.
Yes.
I am concerned that the limitation is too small, especially for houses that will have an internal ADU, or will be duplexes. The .15 FAR for detached structures would not allow a garage as well as ADU, if the garage is counted. Should be more.
These methods are completely inadequate for controlling the visible size of new houses and their appearance. They do not address design, setbacks, heights, and are silent on skinny houses which are the greatest purveyors of houses which do not fit into single family neighborhoods.
You haven't indicated in this survey what the FAR is. Consequently, I don't know what you mean by "proportional" because you haven't specified it here. Clearly NYC's FAR is a different proportionality than St. Louis's FAR. Unless you specify the actual FAR in a survey, the responses you get back are meaningless because we don't actually have enough information to make meaningful comments.
Houses of monstrous proportions that do not fit the architectural design of neighborhoods should not be allowed. The charm of Portland is in the unique features of each neighborhood. When homes are torn down in these traditional neighborhoods to build multiple dwelling units on single lots, the

overall effect diminishes the character of the neighborhood by producing a crowded claustrophobic effect.
Don't allow R2.5. One house per 50 by 100 square lot, this gives people a yard and space to enjoy. Attics should be included in the height of a house.
This sounds like a good change. I am in favor of smaller units like ADUs having more space flexibility. What I do not like are the new gigantic houses that take up nearly an entire lot and are often offered for sale at prices well above the median value for homes in the area.
Distinction needed for clarity. Define shed and distinguish 'movable'. Movable could be distinguished as temporary, without a foundation. Current FAR tabulations and definition does not distinguish moveable structures to be included. By including 'shed' in the language, this would be a structure with a foundation and more than 7 feet in height. Define attic for clarity of enforcement.
I don't know what is meant by FAR
I don't feel that the proposal "maintains flexibility" because the proposed height and setback rules will reduce by renovation and redevelopment options.
Drastically reducing the size limit while simultaneously increasing the unit count is counterproductive. You are basically forcing people to only build 1-bedroom units. We need diversity in housing types and should be increasing allowable square footage so people can build a wide range of housing types - including larger 2,3,4-bedroom houses for families or co-housing.
I disagree with this. I do not believe the city should allow any more skinny houses to be built. We live in this neighborhood for a reason. We do not want more traffic. We want a safe neighborhood for our children. Skinny houses are also not aesthetically pleasing.
Good idea.
like it
Smaller house size does not automatically appeal to all residents. I think the new rules should allow the smaller housing options, but limiting house size should not be kept.
I don't think residents want to solve the problem of large house size by allowing TWO houses to be built on the lot instead. That's a disingenuous way to respond to the problem.
This should be considered a "taking" if you are going to implement new restrictions that limit house size based on a new set of "planning guidelines". You seem to think you know what is better based on your point of view, we need less government controls. If you want to help, please stop the homeless people from trashing and polluting at will and leaving the mess and environmental contamination for everyone else to clean up. No more defecating in the r/w's and bushes and streets.
First priority should be NOT to demolish an existing home. All these suggestions are obfuscations and are an attempt to let developers build the biggest house they can—and make the most profit.
I love that the house size (square-footage) is being limited. The fact that developers can't build as large houses will decrease demolitions and increase affordability.
Basement areas should be included in square foot calculations for FAR.
The maximum housing size must be smaller and size should include basements and attics. ADUs should be included in the FAR. Since most single family houses affected by RIP are only 1,600 sq ft., the RIP proposals of a 2,500 sq ft duplex are 86% bigger than existing single family houses. Proposals of 4,500 sq ft development of duplex + ADUs will be bigger than 99% of existing single family houses.
Allowing variances for "affordable" multi family units and (as with larger transit oriented projects) waive parking requirements to allow for more green space on the lot.
I support these
Current RIP standards are absurd in that they do not match the far denser character of many of Portland's residential areas. I am categorically opposed to and limits on density because these policies

<p>serve to exclude tenants (who are predominantly low-income people and more likely to be marginalized folk or POC). Limiting density to 0.15 FAR in the midst of a housing affordability crisis is exclusionary and regressive in terms of equity. The city should be doing everything in its power to reverse its disastrous legacy of gentrification by encouraging and incentivizing new affordable units without reinforcing discriminatory and racist density requirements.</p>
<p>Why is Portland REDUCING allowable FAR (from current envelope standards) when we're supposedly in the middle of a housing crisis? A 0.5 FAR on a 5000sf lot is a 2500sf. How does .15 extra FAR get us to an 800sf ADU on top of the 2500sf house? Or even harder, to a triplex with units that are reasonable for families? Reducing effective allowable FAR will ONLY encourage the building of more single family houses and DISCOURAGE ADUs and duplexes. Homes are built and sold based on cost per square foot. If you were a builder and could sell one SFH for \$3/sf but it cost you \$1.50/sf to build, or you could sell a triplex for \$3/sf but it cost you \$2.50/sf to build (because kitchens and baths are expensive), which would you build? You'd build a single family house at 2500sf with no ADU. To understand the implications of this policy, all you need to do is think like a developer and figure out what would be most profitable to build under these rules. Developers want to do the right thing, but not if you back them into a corner.</p>
<p>Are sheds and detached garages currently included in allowable house sizes? This doesn't make sense.</p>
<p>This feels like a no-brainer. Unless we want our neighborhoods to become like San Francisco.</p>
<p>Really? Would city hall even listen. Basement s are floor space.</p>
<p>Yes. Mammoth houses that completely fill the lot is bad for water runoff. And they are ugly.</p>
<p>Thanks for maintaining flexibility! But please do not reduce housing sizes. Leaving housing sizes as-is facilitates future opportunities for internal conversions, which would help meet Portland's goals for housing affordability, safe transportation choices, and climate change mitigation.</p>
<p>We support scaling house size to lot size. One of the pernicious trends that we see is for development of houses that extend from lot boundary-to-lot boundary. This severely reduces or eliminates yards and increases neighbor-to-neighbor tensions. We do not support allowing detached accessory dwelling units as an exception to the the limits on FAR. This is equivalent to allowing a small 'second house' on the property and undercuts the intention of limiting FAR. Allowance for garages or sheds is ok as an exception to FAR as long as setback limits are established so that someone cannot build a four-car garage on the property line.</p>
<p>This seems reasonable</p>
<p>If the City government was truly our government, not the plaything of the developers , and the RIP was put before the residents of our once great city to consider openly so that we might truly be informed of these specific proposals in advance</p>
<p>Do not want to see attics and basements extend house size limits</p>
<p>smaller is more affordable</p>
<p>Houses in Eastmoreland historically were constructed to allow for space between the house and property boundaries greater than a minimum of five feet. This allowed for the gracious landscaping features (shrubs, flower beds, open lawn) that some newly-built houses lack. New houses built on historic Eastmoreland lots in the last two-three years have been built within 5 feet of side and back lots, leaving little space for landscaping.</p>
<p>yes</p>
<p>Attics should not be excluded and the limit should reflect the context of the immediate neighborhood, not one-proportion-fits-all.</p>
<p>make them all smaller, as portland touts being green, do people need that large of a mcmansion?</p>

<p>1. The whole concept of the Residential Infill Project was first conceived to address RESIDENTIAL INFILL (hence its name) and secondarily to address the upset of single family homeowners about the size of new homes replacing livable smaller homes next door to them. The culprit McMansion developers often started out as suburban developers who found the city to be where the demand was—at least for the luxury home market they pursued. HOWEVER, the priorities seem to be reversed in these staff recommendations. In attempting to reduce house size, RIP does not take into account the needs of the locally-based incremental developer who seeks to make neighborhoods more walkable and economically diverse by building more “Missing Middle” housing--INCLUDING FOURPLEXES. According to R. John Anderson, a Missing Middle expert, “Four units is a single family house for the purposes of a mortgages insured by the VA, FHA, Fannie Mae, or Freddie Mac. So why should we define it differently?” The proposed standards do far too little to get the kind of residential infill that will someday make our neighborhoods more affordable to a wider range of the population. In more direct response to #1, FAR for all areas should be 1.0. ADUs should get much more FAR than garages and sheds! Do not limit house size if it means making fourplexes unfeasible.</p>
<p>YES! Towering houses have disrupted privacy and gardens.</p>
<p>Do not exclude attics from house size limits. It is above ground and should be included.</p>
<p>Does not sound unreasonable</p>
<p>Set house size limit according to the number of units to be included in the house. A house that includes more units should be allowed to be larger so that some of these units can have multiple bedrooms to be family-friendly. These graduated size limits should still address McMansion/housing affordability concerns.</p>
<p>agree that overfilling a lot is detrimental to the city</p>
<p>Yes, I think house sizes should be proportional to the lot size to allow for large trees and more green space. I am concerned about the current trend for developers to build huge homes in close proximity to each other, reducing green space to the bare minimum. Those homes are not in compliance with Portland's CAP vision.</p>
<p>Do not establish a limit on house size by zone. Look closer at the neighbors.</p>
<p>Accept</p>
<p>In Eastmoreland, developers are building huge houses right on top of each other. Turning a blind eye to what the developers throw up for maximum profit is disgraceful.</p>
<p>That seems reasonable.</p>
<p>New buildings should blend into the neighborhood, reflecting similar scale, proportion and set-back. Homeowners choose a neighborhood based on what they can afford and what the neighborhood looks like. I believe the city and the building consortium does damage when they dictate that more and larger houses must fill our neighborhoods. What about us - the homeowners who have saved their hard-earned money to buy a house in a neighborhood they love? Please don't ruin our neighborhoods in order to accommodate more people. Build your condos, apartments and multi-unit housing in neighborhoods where they currently exist.</p>
<p>Any new construction should be compatible in design, materials and size with adjacent properties. No more modern McMansions or tacky monster duplexes !!!!!!!</p>
<p>I agree with the first suggestion.</p>
<p>Agree</p>
<p>Insufficient, it needs to limit size MORE.</p>
<p>If flexibility of the definitions of R7, R5 and R2.5 means you can cram two or three homes on a lot that exists in a single family neighborhood, then NO,I do not support this. If I had wanted to live in a</p>

neighborhood of high density skinny houses, condos and apartment buildings, I would have purchased a home in a neighborhood where high density already exists.
In favor.
I'm extremely worried about the very low FAR requirement resulting in fewer housing units; we need to vastly increase our urban density!
Come on out and tell us the FAR proportion. Without that specificity, we don't know if you're talking about a 2,000 square foot house on a 7,500 square foot lot or a 2,000 square foot house on a 3,500 square foot lot! The .15 for an accessory structure is too large for a larger lot. That can allow an entire second house as an ADU on a large enough lot.
I appreciate the restriction on out-of-proportion houses, but the examples I saw at the public meetings do not make sense.
ADUs should not be considered rentable space. Storage is the best application.
Do not exclude basements or attics. Size including basement and attic should be limited based on average size of existing houses in neighborhood.
We have a housing emergency. How does this help provide additional housing for Portlanders? Urban FAR should be 1.0 or higher. Stop trying to suburbanize our city.
I think building excessively gargantuan houses is foolish and tacky, but forbidding them is a bad idea. Rich morons will just build their mcmansion monstrosities somewhere else. After they get bored of their "dream house" nightmares, the houses can be divided into reasonably sized multiplexes later. Change zoning to allow multiplexes!
.5 FAR with a .15 bump for a detached ADU will prevent the construction of the best examples of Middle Scale Building that can be found on the ground in Portland neighborhoods. Test a zoning code with the best existing precedents.
approve of allowing any additional adu space -- helps to provide affordable housing
I like this. It stops oversized buildings from being built in Portland.
I think this size proscription should go in the other direction: promote attached housing within R7, R5, and R2.5 Here's two ways to do that: give a bonus for dividing up an existing house into several units or a bonus for building an attached unit. Why? Because those two forms of adding units lead to greater GHG reduction over the life of the unit. ADUs simply do not perform as well as attached housing, see DEQ study by Palmeri.
I believe it is appropriate to regulate setbacks and have certain height restrictions to a certain extent, however, I believe that if a property owner wants to include a second (or third or fourth!) dwelling within those setback and height limits, they should be allowed. I believe that single-dwelling lots (R5) should become an obsolete zoning ordinance. I believe a FAR calculation is a good one.
Would rather not see size limits, but I'm happy to trade for greater unit density
Agree and require off street parking
What is the objective?00 More smaller houses?
STOP increasing density in our city!
Yes please! This is great.
A 2500 square foot house is average these days. The square foot measuring attic and basement is just dumb. Size house to proportion of the lot would make more sense and preserve the green space to help handle water run off we deal with in SW
Allow more FAR specifically to create more housing, included renting and homeownership. Prioritize higher FAR for affordable projects (for those renting/owning at 0-65% MFI)
This is ridiculous NIMBY policy, bad policy.
Good idea. Large houses are stupid, we should have larger yards.

the limits on FAR seem excessive if well over half of all houses built in 2015 would not meet the standard. I'd like to see a wider variety of houses built.
This seems like a reasonable approach to lowering housing costs and alleviating neighborhood concerns over scale
The house size proposed is too small. It's an over-reaction and doesn't recognize that larger houses have been built in our city since it was a city. The first houses along Mt Tabor were large. In our rich cityscape, there are larger craftsman and victorian homes that are landmarks. I'm sure when those were built, people complained about their size, but they contribute to our diverse housing stock.
Agree for more dense neighborhoods but less dense neighborhoods on the west side or outer east side should have more flexibility.
ok
ok with this
FAR is an excellent tool to try address many stakeholders concerns for houses that integrate better with established neighborhood. But measures have to be constructed carefully not to punish high performing buildings. So items like highs that accommodate raised heel trusses or thicker walls are going to be very important.
the reduction in house size is commendable. however for a 5000 sq ft lot located in r5 zoning a 2500 sq ft single family home is still excessive.
Include basements in total FAR for the house, unless first floor is no higher than 3 feet above grade. Most existing homes have a finished floor elevation that is not more than three feet above the lowest ground elevation.
Only a tiny percentage of homes built over the last 10 years have exceeded the maximum sizes proposed here. The size limitations proposed give people a false sense of what house sizes will be. For 90-95% of homes built, the new size limitations will have no effect on reducing the size of the home built. What should happen is that context to surrounding homes needs to be taken into consideration and this is just a lazy one size fits all approach. What people hate is when smaller homes are replaced with homes so out of scale with surrounding homes that they look like giant monsters. These size limitations will do nothing to abate that problem.
The size restrictions in the current draft are inadequate and far exceed the average house size in Portland. Basements should be included in the calculations.
Sounds good
Using FAR as a measure of house size is a good idea but I think that a basement should be counted in this unless the first floor is no higher than two feet above grade. Lot coverage should be tied to lot size: FAR should be 0.5 for all lot sizes.
I oppose this. Houses should be built based on consumer demand. A 1750 sqft house on a R2.5 lot is TINY. You need to think about people who have a family, including multigenerational families or roommate situations. They are going to want several bedrooms and bathrooms, and that's not reasonable in a house 1750 sqft or smaller. There's also no reason to limit the size of a house on any size lot. You're going to push wealthier families who want larger houses out of Portland, which means the local community and schools will continue to deteriorate because those families tend to donate a lot of time and money to the local neighborhood. It will also continue to worsen traffic. Don't you want these wealthier people to stay in the city? They'll pay more in property taxes, which will help the city too, and spend more money in Portland which will also help the economy.
Great!
I support smaller homes. The smaller, the better.
i am okay with limiting single family house sizes and allowing additional FAR for ADUs. I would have a higher size limit for multifamily structures including duplexes and triplexes.

Good proposal. Too many McMansions have been permitted in inner city.
Sounds good.
Basements should only be excluded if at least 75% below grade. The impact of solar obstruction on existing homes should be considered.
Avoid overcomplication with this approach and ensure very clear singular interpretation of what counts as FAR.
Additional FAR should be allowed for duplex/triplex to encourage density
#1
Please do not limit house size. As the Johnson Economics report explains, such a limit will result in fewer housing units being developed, thereby worsening Portland's housing crisis.
This proposal severely limits the property rights of my family and every family who lives in the affected neighborhood. If I want to build a shed or expand my garage, I'll be affected. If I want to expand my house, I'll be affected. My attic space will be restricted. The only choice you've given me is to build down into my basement. Of course the limitations also affect existing housing, but the aim of the RIP is to destroy and replace existing single-family attached housing and replace it with something amenable to the interests of developers. All without any formal public process. I have visited Eastern Europe under communism and this falls right in line with their policies.
Reduce FAR to the UNR recommendation. Use total square footage of the house in the calculation. Strive to make a change from vast majority of outsize stuff happening now (take a look at 43rd and Klickitat, for example).
Emphasis is needed on basement space. More of this will help us more than cheesy ADU's etc. Increases in basement space should be mandated by the city.
What is wrong with maintaining the current zoning restrictions? That is what I bought in to and pay taxes to continue.
I support this.
I agree with this policy change. My only concern is the 0.15 FAR for detached structures is very limiting for smaller lots. A 2,500 sf lot, for instance, allows only 375 FAR for a detached unit. This is too small to allow for a garage and small ADU. Perhaps scaling the additional FAR for smaller lots to 0.20 or 0.25 would be more reasonable. These structures should not be large but I think it is important to allow for utility space and the addition of an adequate living space.
Recommended FAR is too small in R5 and less dense. The big issue is height....go with proposed height limits and increase FAR in SF zones.
Leave R5 and 2.5 alone. This is where the majority of the city tax base dwells and penalizing everyone for the benefit of a few will result in recalls.
yes please
Yes
Size limits simply discourage the development of larger lots. Given that the price of land is increasing rapidly in Portland, larger lots become far less attractive and sit idle (or worse, abandoned).
I support these changes
House size should not be by zone but by lot size. If a house has a larger lot then the house could be bigger. Zoning has not that much to do with it.
no rip, it displaces many portlanders
Do you expect the citizenry to decide on something this far-reaching, that will forever impact their lives and their property, based-on a few blurbs in a "survey"?? Stop Demolishing Portland demands that the final RIP proposal be placed on the ballot for a popular-vote. Give the voters time to study & understand exactly what you are proposing - if you're so-certain that this is the right thing for

<p>Portland, then it will withstand a vote of The People. #RipCityRIPVote  <a href="https://www.change.org/p/portland-city-council-no-vote-no-rip-portlanders-deserve-a-vote?recruiter=143237455&amp;utm_source=share_petition&amp;utm_medium=copylink&amp;utm_campaign=share_page">https://www.change.org/p/portland-city-council-no-vote-no-rip-portlanders-deserve-a-vote?recruiter=143237455&amp;utm_source=share_petition&amp;utm_medium=copylink&amp;utm_campaign=share_page</a></p>
<p>Proposed house size limits are too small.</p>
<p>Regarding bullet 1, Limit the size of houses while maintaining flexibility (R7, R5, and R2.5 zones), though I support the concept, I object to the specific proposal and urge two revisions: First, for R2.5 - 2,500 s.f. standard lots, instead of the proposed 0.7:1 FAR at 1,750 allow 0.72 FAR at 1,800. Second, for R2.5 - 1,600 s.f. minimum lots, instead of the proposed 0.7:1 FAR at 1,120 allow 0.75 FAR at 1,200. As proposed, the maximum house sizes for the R2.5 at these two lot sizes seem a tad too restrictive. I also thinking having rounder maximum numbers (1,800 and 1,200) will be less difficult to know, remember, and implement. I support bullets 2 and 3 as proposed.</p>
<p>We do NOT support "tiny homes," or ADUs less than 500 square feet in size. The current fad will not be sustainable. Anything less than 500 square feet is a short-term transition home and is not livable for more than one person for any prolonged length of time. Ultimately, there will tremendous waste of resources--monetary and building material--when the tiny home / ADU fad ends.</p>
<p>There should be some sort of size restriction to match the neighborhood not one that is for all of Portland.</p>
<p>No. The houses are already small enough. What about houses in other areas around Portland? Why isn't Northwest Portland or the West Hills being considered?</p>
<p>No opinion</p>
<p>Limiting house sizes is what we citizens are for. I am against how this is used and manipulated in the Proposed Overlay Zone</p>
<p>Size limits are good, and should have been undertaken long ago. Look around at all the new buildings, they are all disproportionate to the area. There should be an average height and size taken by neighborhood and that should determine what is then put up, including height and lot saturation.</p>
<p>Do not change our zoning</p>
<p>Yes, limit size of houses and maintain historical character of neighborhoods. Increase housing stock with ADUs and build higher along commercial corridors.</p>
<p>Do not limit home size as proposed. Keep at least current built size maximum.</p>
<p>Bad idea. Build homes as big as the market will bear.</p>
<p>Limiting the FAR for house size makes sense. I believe that the additional FAR for detached accessory structures should be scaled similar to how the house sizes are scaled, i.e. R2.5 needs a greater allowance than R7.</p>
<p>Switching to an FAR system sounds good for single-dwelling zones, where you will still have limits on number of dwelling units (in the multi-dwelling zones it sounds like a nightmare). YES to extra FAR for detached accessory structures. And YES to keeping the same definition for what qualifies as living space as is already in the code.</p>
<p>no comment on this part of your proposal</p>
<p>I am supportive of these provisions.</p>
<p>This doesn't seem to maintain flexibility but will shrink space.</p>
<p>I support capping home sizes to be more compatible with neighborhoods and with Portlanders' housing needs. However, modest changes we recommend include: ● FAR for duplexes. Investigate development of new duplexes in Portland and comparable cities/markets, and consider whether a slight increase in FAR for duplexes may increase the likelihood that they will be built. (If relevant, examine this for triplexes as well.)</p>

Request 0.25 FAR for detached accessory structures
TOO MUCH DENSITY ALL FOR CLOSE-IN! The high density boundary impinge too much and burden existing neighborhoods with baring the weight of all the growth. Go farther out to build--as a balance and because there is SPACE out there and the need for neighborhood building-- and preserve more OPEN SPACE, and SFR close in.
I support these proposals.
I think this is reasonable but you should consider what you are measuring against in terms of how large compared to lot size.
What is considered a low ceiling?
I think establishing a limit is good, but these new sizes may still be too large because these lots are still not very big and the buildings take up most of the space - this makes the lot very crowded and there's no room for yards or trees.
We need to have enough room for areas to grow food, solar production, trees, etc. that the city encourages. Must have parking!
I am a homeowner in this area and very unhappy by this proposal. It very much negatively impacts my community and my investment. It is not fair to change the rules for existing home owners. Things like this should apply to newly established neighborhoods, where homeowners agree before they purchase. You can't just change existing neighborhoods and the rules that apply to them. I very much lose out when the value of my home goes down because a skinny house is wedged in next door. Will I be reimbursed for that?
Limit on size should be in proportion to neighborhood houses, not lot size. Otherwise, will be out of scale in many areas.
i am not for limiting sizes of houses, as long as they meet present codes. demolition and house size are two different things. i agree with excluding attics and basements
Limits proposed by this plan are ineffective and too easy to game. Houses could still be over 4000sqft by creative use of multiple stories. These limits need to be more stringent if you're going to call them limits.
Project needs a 6 month delay to fully assess how this will affect neighborhoods. No time for people to meet.
What is the limit needed for?
I think these are generally good ideas.
Yes, support!
I like this. Keeping house size down helps with character, while flexibility of use makes sense in a changing and progressive city.
What goal does this promote? Does it increase units per lot? Or is it just an aesthetic consideration?
You shouldn't limit the size of houses. Allow big houses *and* more units. It will allow more building to be actually profitable and therefore encourage supply.
Size of homes need to be small so people who work in Portland can afford to live in Portland. Portland has job sprawl, so increasing density far from the job centers of Beaverton/Hillsboro, Tualatin/Wilsonville and Vancouver is just plain stupid. You need to increase the density of high-paying jobs in urban areas before increasing the density of expensive housing. People increasingly have to work in the suburbs in order to afford to live in the very expensive housing that is being put in Portland right now.
Not necessary. Let builders build.

I support this measure, but strongly urge you to exclude highly insulated walls and roofs from the calculation. Otherwise you are disincentivizing energy efficient construction and are at odds with the Portland 2015 Climate Action Plan.
I support the proposed limits on house sizes under the FAR formula. I oppose the proposal for additional allowance for ADRs since it is most likely that their use will be for periodic rental purposes and not long-term residential use, thereby doing nothing to increase density, absent significant study by the City that would support a conclusion of long-term residential use.
please add: Allow exemptions for super insulated homes that provide additional wall depth for added insulation
It's good to limit the size of units to limit their price, but I'd rather allow more people to live in a larger structure in an R7, R5, or R2.5 zone than to restrict the size of the structures.
No comment.
There are two main reasons I am opposed to limiting the size of a house. The city of Portland is desperate for money. Has there been a study to measure the economic impact on the city revenue to each of these proposals and if not, how can the city move forward without knowing what the economic impact these will have on the cities revenue. Reason number two. We have a housing shortage. How is limiting the size of homes going to help this? I have a 25x100 lot I planned on building a 1,800 sf house with a detached 800sf adu with the idea of potentially turning the 1,800 sf houses basement into a 600 sf adu. The existing proposal would eliminate this plan and I would end up building a a 1,750 sf house without the adu's. So, the proposed plan would eliminate two desperately needed housing/adu's and decrease desperately needed tax revenue. The taxes on my plan would probably bring the city 12k annually, the proposed plan would bring the city half that. So, for one lot... these proposals would decrease tax revenue and reduce housing supply by two units. Multiply this example by 1,000's (the number of future lots this proposal will impact). Therefore, the stated goals or needs of the city are in no way being encouraged by limiting the size of houses.
Until the 2035 Comprehensive plan is fully up and operational for at least a year, the RIP should be on hold.
Agree. We need to allow more ADUs
I think these are generally reasonable proposals.
The proposal for defining "floor area" penalizes homeowners who have existing low-ceiling basements. Our house, built in 1909, has a 1200 sf unfinished basement with a 6'-4" ceiling. It extends above grade 4' but below grade only 3'-6", meaning that it would all count as floor area even though it does not have a high enough ceiling to be legally converted to habitable space. If I wanted to add 500 sf to my house, I would not be able to, since the unfinished basement maxes out the FAR. Since it appears that the point of this proposal is to limit the height of basements above grade, it would make more sense to set a maximum height above grade (4 or 5 feet?) below which basements would not count as floor area. Also, why set the height above which attic space counts as floor area at 6'-8"? It would make more sense to set the cut-off at 7'-0", which is the minimum height for habitable space per the Oregon Residential Specialty Code.
I think this generally seems like a good idea, although I'm somewhat indifferent. I like the idea of limiting the scale of single-family houses, but it's not necessarily the scale of the building but the scale of the building for one household. I think that we should allow larger structures if the unit is going to be a duplex/triplex. I'm also not sure how realistic 375 square foot ADUs are. Are that many people really going to utilize this option? This section overall seems like a great area to get lots of feedback from developers about what is realistic/feasible, so that it's not just well-intentioned policy but development that actually is realized.

The basement exclusion should be dependent on how far below grade the basement is. Basements that extend above grade by 50% or more and "walk-out" basements should contribute to the house size limits.
0.5 should be the FAR for all zones
Why does the state / or city in this case, have to always shove their noses in everything? Why not allow people to build whatever homes they want? Instead of writing stupid laws like this, how about you first focus on infrastructure. Fix the roads, widen roads, clean up. And lower taxes. Oh wait. You can't budget.
This appears to limit all new construction to 2500 sq. ft. Such a limit is not appropriate in a neighborhood which have an historic character based on a preponderance of older larger homes. How does the infill proposal address the Irvington Historic District requirements? Some basic questions are not addressed: 1. How did you arrive at the projection of 123,000 new family units by 2035? Twenty-five years ago, large population increases were also projected to support increased density in close-in neighborhoods. These projections did not materialize. 2. The proposed infill plan will only accommodate a limited number of new residents in the city. What will be done to accommodate future projected population growth? How dense should Portland become? What are the effects of increasing density on air, water, and livability. Portland is now a desirable city precisely because it is not overcrowded like every other major city on the West Coast. Once a city, such as San Diego, has become a congested nightmare, it cannot be undone. Is this what we want for Portland. The better solution is to promote the location of businesses in smaller communities that want increased population
A gift developers. This is a giant loophole
I'm against this measure.
loophole large enough to make significantly larger house. Developers know this and proposal is misleading.
Agree
Is it a goal to prevent people from gaming size limits by just finishing a lot of basements/low attics?
You need to maintain setbacks in spite of additional FAR allowances otherwise structures will crowd each other on adjacent properties. You also need to consider fire separation.
Allow MORE additional far for duplexes, triplexes, multiplexes and adus
I am for smaller house size! I live in an old Victorian, less than 1400 sq feet with a large yard. I worry what happens to all the green space around the traditional homes in our neighborhoods when they are torn down and huge houses are built that loom over the remaining homes and have no green space left. Also, 2 smaller homes will allow moderate income folks to enter into home ownership.
limit house heights - do not want my house not getting sun

**2. Revise how height is measured (all zones).**

- **Continue to allow 2½ story houses on standard lots (30 feet high).**
- **Measure height from the lowest point near the house, not the highest point.**
- **Clarify that small dormers are excluded from the height measurement.**

Fine
There is no need for this change, it is not necessary and will only reduce building options and prevent increases in density and affordability. The measurement should be from the highest point near the

house, not the lowest. This will only prevent increases in density and limit options for duplexes, triplexes and townhomes.
I like this.
I agree
Yes, thank you for the "lowest point" measurement.
Ok
These are fine, especially with the change to measuring from the lowest point.
Limits should consider housing demographics for the area.
In am seeing 3plus story houses on recent infill in my neighborhood. This has detracted from the livability and causes over crowding. The reason I purchased a bigger lot was for more privacy. My neighbors delveloped an unsightly 3.5 story row house into a single family lot. They also split the original house into two units. Now there are 4 families in the once single family lot. This has caused tension in the neighborhood and fostered a new project that completed across the street that is over 3 stories. Now the once stately neighborhood does not have a clear view of the park and has devalued our home value. It is to a point where most homeowners are selling to getting out before more infil detracts from home value. This is poor planning and will get worse if it keeps going unchecked.
Southwest Portland is replete with hills on which present and future housing stock will be built. The proposal penalizes those with homes where the non-street frontage is below the street grade, will result in a flattened appearance; likely the house across the street will be much taller in scale.
Great!
I disagree with this; I live in SW Portland on a slope; it would be ridiculous to shorten the house so much. Maybe instead of the lowest point it might be the midway point between the two houses - but no shorter than adjacent houses
Sounds good to me.
Oppose. Basically you are just saying buildings should be smaller than they have been. That seems wrong if we are going to grow and accommodate more people.
We live on a VERY steep hill, sloping down away from the street: almost a 2 story drop from front to back of our house. Would this mean that if we re-built our house, we could only have 1/2 story above ground? Seems like this needs to be adjusted for topography in many of these cases. We have a 2 story house but it does not look big from street level since it is, well, just a 2 story house. But if measured from the back of the property, it would be way too high....
measure height from lowest point, AND REDUCE HEIGHT ALLOWED; dormers should not be excluded
Good
AGAINST
good
I think it should not go past 2 stories - 20-25 feet max
Sounds good
2.5 stories encourages the behemoths! 2 stories is plenty!
Agreed
This is grossly out of scale in our 90% single or single with dormer neighborhood. 2 1/2 stories blocks solar access and creates canyon effect
I strongly support this change.
I like measuring height from lowest point- need to see something that ties into existing neighborhood- can not go over 5 feet above the existing median height of housing on that block.

I am very happy about this change, because it will get ride of, what is essentially 3 1/2 story houses for lots that slope up from the side walk.
Again, new houses are built as large and high as possible on their lots, regardless of structures surrounding, thereby appearing out of scale with the neighborhood.
Increased height encourages density, so this is also a stop backwards.
A+
agree
I think height should be measured from the highest point near the house, and at least 3 stories should be allowed. With a growing city, we should be allowing taller dwellings to be built.
Largely ok.
This is fine
Having a hard height limit will make it difficult to build a decent sized home with an architecturally appealing look. The ordinance should stay as it is.
Why? What goal is this change trying to achieve?
Change from highest point to lowest point seems unnecessary, but is mostly inoffensive.
Indifferent.
I agree
I see pro and cons on this proposal. I think a near by Neighbor exception approval should be allowed using old rules, but only with adjacent properties/ solar access impacted required to approve.
Good
Great
Better then existing
No
Yeah, okay
This does not fit with current development. Houses on lots that sit above the street grade sit much taller than those that sit as street grade. Perhaps an average between front and rear elevations?
support!
Large shed dormers are very common on historic and modern stock. They should continue to be allowed. The FARs are sufficient to deal with massing, there should not be a reduced height limit. Increasing basement heights or adding attics are some of the cheapest way to create ADUs.
Yes, measure from lowest point. No on 2.5 story homes on standard lots - houses should match character of surrounding homes -- initiate design review standards, and require alternatives analysis for meeting square footage, including adding basement level for new/redevelopment.
I object to reducing zones in R5 to R 2.5 it will destroy the neighborhood, destroy green space, and promote destruction of older homes. Otherwise this seems OK.
Good.
There should be NO CHANGES to height measurements the current regulations are fine!
I would be okay with building higher to 3 and 4 stories. We need more of the middle-sized housing that isn't just large apartment buildings.
Ideally, scale would be related to neighbors nearby, similar to proposed setback standards.
Should CONTINUE to measure height from the lowest point near the house so a new house will not overshadow existing adjacent homes.
The height limits are already pretty restrictive I don't really see the point of making them more restrictive. The way heights are measured is not equitable for shed roofed buildings.

Don't really care.
Fine with me as long as we limit the size of houses by lot size.
New structures should take into account pre existing structures and how they are going to affect those properties and owners. Natural light, views, traffic, parking...
definition of "small dormer" is too strict. If a house is not sitting "at the setback" does it matter if the dormer comes to the outer wall? height limit is too harsh for buildings on modest natural slopes.
I prefer old method of highest point
I support continued allowed of 30 feet high houses on standard lots as well as the revision to height measurement methodology. Also, related (in case there isn't another place to comment on height limits), if you are going to reduce the height for detached structures in R 2.5 to 30 feet then also do the same for attached structures in R.2.5, especially if the plan to rezone areas with historically platted narrow lots to R 2.5 holds. Having 35 ft tall attached townhomes next to / inter-mixed with 30 ft. tall s.f. homes will continue to bother people who don't want those housing types in their neighborhood! I understand this proposed height change is to reduce concerns about stand-alone skinny houses, and doesn't seem necessary in that context as a typical narrow lot structure likely can't get close with the 1.5x the width requirement (15' wide house x1.5=22.5').
ok
OK
Agree, as long as neighbors can have input in case the new house being built on the neighbors property will greatly impact their property value due to view blocking or excessive yard shading from height of building
Sounds good.
Good
Good.
I like this one
I would suggest 35' to allow more interesting design options.
no one should be allowed to take the sunlight from someone's backyard without their written permission, i.e. no large houses, 30 ft. is much too high, look on Klickitat fro example around 45th or so, two new huge houses have ruined the backyard behing them.
this is one of the most important aspects of keeping neighbors happy. Don't allow developers to steal light from existing homes! It affects our ability to have houseplants, to grow our own food and literally to survive seasonal depression!
Homes should fit in with their nearest neighbors and not stand out - out of character or out of height.
This really depends upon the scale of other homes on the street. On my street we have only one storey homes with attics. A 2 1/2 storey home would look silly. On other streets it might be just fine.
Ok
All houses built should may h the e,istibg homes. Exclude ULTA modern homes. They don't fit the neighborhood
Again, I don't think it's worthwhile to distinguish heights between R5 and R2.5.
Yes, agree
Measure height to the ridge line of the house and fronting curb. Do not allow the house to be larger than the adjacent neighboring houses by more than 9'.
No opinion
2 1/2 story homes are out of proportion to those already in the neighborhood. They are more expensive and less affordable than the one story houses already present.

Design review to blend into existing neighborhood. No towering homes on a street of modest bungalows. Current infill is for speculative profit only, not for improved neighborhoods or needs of homeowners.
Define "small" for "small dormers".
I am neutral on this point.
Height should be measured relative to the highest point near the house.
Dependent on how close it is to an adjacent home. In a neighborhood of all one story homes, building a 2 1/2 story home might not fit especially when the design does not fit the existing styles.
Uncertain
No
Should be proportional to other homes in neighborhood
Height should be limited to the average height of existing houses on surrounding blocks.
new construction (or remodels of existing houses) should be no higher than the average for the neighborhood.
Agree
Height measurement should take neighborhood context into account (how are surrounding houses measured?)
Ok
Limit height to current neighboring house average.
approve
The height of the house should be proportional to the other houses in the neighborhood. Otherwise older homes lose privacy with windows overlooking bathrooms, bedrooms and back yards.
I live on a steep hill. With this standard, I would have 5 foot ceilings. I oppose.
The average lot elevation should be used, not low or high.
OK I guess....not clear how much difference this change makes or how many properties that effects.
No comment.
OK
This seems unnecessarily restrictive; this land is zoned from housing so you should allow higher heights so more people can live there.
I agree
Yes - again see 4925 N. Princeton and the 2 homes that flank it.
Indifferent
Keep zoning as it currently stand!
I disagree with excluding small dormers.
these monstrosities dwarf homes next to them, look ridiculous and damage neighborhood character. A home should only be allowed to have the same number of stories as the one next door to it AND across the street.
height needs to be reduced further otherwise you have a neighborhood of extremely tall homes and those that are normal the older homes
Does "allow" 2 1/2 story houses mean it's the maximum height allowed? Maybe say "Continue to allow 2 1/2 story houses (but no taller) on standard lots.... etc."
No. Height at base of house closer to 20-25 ft so that new structure blends into existing neighborhood. No McMansions unless in a neighborhood with those.
Yes!

Clarify size of small dormers.
Continue to allow 30 feet tall houses
Why is this written in complex jargon only City planners can understand? This seems like it's done to make sure you can push through your agenda. What are the implications of this? What does it mean in real life? How will it change the face and character of our neighborhood? Why did you designate only the areas with the cheapest and smallest homes? Why not encourage knocking down the giant homes on the ridge and replacing those with 4-plexes?
As above. Build big house build small houses. Just increase density, and stop privileging car owners and parking.
Buildings are too high. Consider reducing by 5 feet. or Measure from the highest point.
Makes sense to me.
Oregon dept of geology and mineral industries has high resolution lidar that can assist in determining elevation.
great
I'm okay with this but don't really like it. This depends so much on what's around. It's really hard when you see an old small one story house with a giant house next to it. It cuts off the light from the original house. I'm sitting right now in a house built in the 70s. A new house was built next door that is 2 stories. I'm in the lower level which is half underground and half out. All I can see out the window is a big wall and fence. And the light in this room is really cut down. There is one across the street from me that is a little 2-3 bedroom house on one level that had big new houses built on either side. It really diminishes the quality of your property when that happens. I think height should be relative to neighboring houses.
30' from LOWEST point (i.e., should be the level of the sidewalk) - not some 'low' level on a hilly lot unless the low level of the lot is BELOW sidewalk level. Dormers should count in the 30' - they make the house look too tall compared to neighboring homes - it's an unnecessary loophole to allow excess height!
I agree.
Agree
I also support this.
Not that important to me
Allow 3 story houses and increase the height limits to 35.feet.
Small dormers not excluded. Only allow 2 1/2 stories if existing houses on either side are 2 1/2 stories
I support these changes.
Yes, extremely important to change height rules.
Seems okay.
This has almost no impact on height for flat lots .
In areas where there are one-story bungalows, a 2.5 story house is out of place. Shouldn't the stories match the pre-existing housing in a neighborhood? I don't understand why you'd exclude "small" dormers. Firstly, I would love a definition of that word "small", but despite a lack of a definition, I would NOT exclude dormers from the height measurement; dormers should certainly be part of the measurement.
Buildings should complement each other in size and features. As an example of building architecture complementing neighboring structures, San Francisco's Mission District hosts a Victorian house neighborhood around Dolores Park. These homes known as "The Painted Ladies" share unique architectural features bringing a cohesive and pleasing effect to the neighborhood. Imagine

tearing one of them down to build a house that matched the whim of the builder or lot owner to maximize profit on the lot. Portland should not allow the reckless demolition of our neighborhoods to satisfy greed.
Stick with current measure height to 30 feet high, small dormers not to exceed height of roof line of home.
Yes. I approve of this change.
Recommend 'strike' story from the definition of height. Instead define the parameters for measuring height more clearly. Expand on the parameters for establishing the 'lowest point'. Define 'dormer' and provide parameters to establish measurement to qualify for a 'small dormer' for clarity of enforcement. A change in the eave height where building wall extends vertical and breaks has a similar aesthetic to some dormers.
What if the lot slopes down - wouldn't that allow houses that are taller than current standards? Also, on lots with steep slopes down to the road, this method of measuring height would severely limit the square footage of the house.
I strongly object to the reduction of height from 35 to 30 feet in the R2.5 zone, essentially prohibiting 3-story townhomes. Three full stories are critical on 15-20-foot-wide homes, especially if the bottom floor includes a garage. 3-story townhomes are a graceful form of residential architecture and part of the "missing middle" that we're trying to encourage.
Same comment as above. You are making the rules too restrictive. If you really cared about adding housing opportunity you wouldn't be trying to limit size and density. Both of these are handouts to NIMBYs who are afraid of change and don't want other people to move into their neighborhoods. It is terrible policy for the city to take.
Near the house on the lot, street, neighboring lot? What if house is on hill side, do measure from low side if house?
OK
Still too damn tall. Here's an idea. Limit ceiling heights to 8.5 feet. They are perfectly adequate and you could lop 10 feet off the house and give neighbors some sunshine. There's also absolutely no need for the extra 1/2 story.
This addition seems arbitrary. I could see certain neighborhoods advancing with rules like this, but it goes contrary to increasing density. Good density for example, has historically been achieved in cities with 5 floor buildings and townhouses, allowing for robust mass transit systems.
No. These new houses dwarf the existing ones around them.
agree
Lower the maximum height! Most single family houses in Portland are shorter than 29 feet high. Measurement must be from highest point on roof, not midpoint. Do not exclude dormers covering 75% of the roof (as proposed). Measurement from lowest point near house is good.
Again, I support these!
fine
I support higher height (and FAR) allowances for all residential zones and would strongly encourage that the city use height as a bonus to incentivize the creation of new affordable housing in residential zones.
What is the reasoning behind this? So that your neighbor on the hill next to you can tower over you? To discourage building on sloped lots? To substantially increase the cost per square foot of houses on sloped lots? To arbitrarily measure from the lowest point rather than the average grade only increases the cost and risk to builders by severely limiting their options, making them much less likely to build anything, MUCH LESS more than one unit. This policy seems to believe we are losing

population, not gaining it. Why is Portland discouraging the ability to build more than one unit per lot?
House height should relate to the context of the surrounding houses.
Absolutely a bad idea. As a resident of SE Portland, the number of in-fill homes that are completely out of scale with neighboring homes is painfully evident. A 3.5 story home in a ranch-style neighborhood is not needed.
Height is height. Who makes up this math?
I'm concerned that measuring from the lowest point near house could lead to very tall house on a sloped lot.
No. Towering houses are intrusive in a neighborhood. How would you like a light-blocking behemoth next door?
2-story houses should be the maximum allowable. If "clarify" means to be specific, please define in precise terms the meaning of small dormers.
Please continue to allow height to be measured from the highest point. This change effectively reduces housing size, which works against Portland's goals for housing affordability, safe transportation choices, and climate change mitigation.
We support requiring measurement from the lowest point near the house. Otherwise houses on more sloped lots can potentially loom over neighboring houses on less sloped lots. Topography is highly variable in some neighborhoods and the intent of this regulation should be to protect visual damage and solar access of neighbors.
This makes little sense on sloped properties. And especially given that a residential area may be overshadowed by high density towers.
Yes
Do not wish to see more than 2 story homes.
good change from current measure from highest point, which encourages lot scraping and filling
I feel measuring height from the lowest point near the house should be the rule. This will prevent houses from casting a shadow over the side and back yards of neighboring lots.
yes
Yes, most conservative point of measurement is best. Also, the existing height of houses on either side should matter more than anything.
smaller..so many people have lost their gardens, and solar panels installed...
Revising how height is measured sounds like we are trying to preserve suburbia! I believe we should allow 3 and even 4 story houses as long as they have at least 3 or 4 units in them.
This one is unclear
Determine size and height of house by the number of units in it.
the lowest point near the house is too vague to be put in the proposal
I am concerned about new, very large 3- and 2.5-story homes being built next to existing more modest homes, dwarfing the existing homes and their access to sunlight. And as above, they are not in compliance with Portland's CAP vision.
Measure height from the lowest point near the house.
Accept
Come to Eastmoreland and see how these giants fit into the rest of the neighborhood.
Okay
Building height should fit the neighborhood.
Again, we must preserve the integrity of our historic neighborhoods!

Yes.
Agree
Should be limited to 2 stories max. Top should be the highest peak, not halfway on the slope of the roof.
Again, if your purpose is to make cramming multiple homes on to lots in single family home neighborhoods, and to somehow make this palatable by controlling the size, shape and placement of the home, then NO I do not support this.
Portland starting look like a city filled with sliver houses
Not in favor of more than 2 story houses. Limit to 2 story houses instead, INCLUDING dormers. Taller is not better.
I approve of this proposal.
Limit to two stories above ground for lots below 5,000 square feet.
Good to measure from lowest point. Must include the driveway if that is below grade.
Allow three story houses by right if they contain at least three units.
I don't have a problem with tall houses.
This height limit method precludes the use of so many proven Middle Scale building types. Test a lot with a classic Portland Foursquare on a lot some modest topography to understand how this height measurement method is too low and sets a lousy method for establishing max. Height. Test it on some real lots with our city's best buildings.
Sounds good.
Switching to measuring height from the lowest point will reduce the amount of square feet of living space allowed within a set footprint. That seems counter to the City's goals. Remove from proposal.
Small dormers should be excluded from the height measurement. If property owners are willing to convert part of their space into a separate dwelling unit for long-term rental, then the city should accommodate the zoning.
I think current heights are fine, but again, if it gets political buy-in for greater density/more units, that's cool.
Agree address parking
Homes are too large, especially the infill properties being built. They are out of character in our neighborhoods.
Yes, thank you!
While going up is a valid solution to more living space in a smaller footprint, it does not take into consideration the aging population and the difficulties with stairs.
Any height that adds additional unites should be allowed to exceed these limits, ESPECIALLY in instances where there could be more units created and/or adus for further densification of R2, R5 and R7 zones
This is ridiculous NIMBY policy, bad policy.
Meh
The house size proposed is too small. It's an over-reaction and doesn't recognize that larger houses have been built in our city since it was a city. The first houses along Mt Tabor were large. In our rich cityscape, there are larger craftsman and victorian homes that are landmarks. I'm sure when those were built, people complained about their size, but they contribute to our diverse housing stock.
ok
ok with this
35 feet should be allowed in R2.5. Changing the measurement is a great idea..

good to see attempts to stop end-run around height requirements by duplicitous means.
Don't agree with the 30 foot height limit. Reduce the height limit to 25 feet for smaller lots (R5 or smaller).
Again, this is a one size fits all approach and does not take into account how the size of the new house will feel in context with surrounding homes. This helps, but doesn't do anything to mitigate against loss of solar access when a huge house is built next to a smaller home.
30 feet is too high and far exceeds the average house in Portland.
Sounds good. Height measurements should also exclude the height of solar arrays, up to an additional 10 inches.
I support measuring the height from the lowest point near the house, not the highest point, but on lots 5000sf or less the house height should be reduced to 25ft. Allow houses to be up to 30 ft. if at least 50% of houses within 300 ft. are larger and taller than 30 ft. Do not allow artificial build up to alter the reference point for measuring the height.
I also oppose this because the "current" approach seems like you could put a garage on the first level, which means the main living floor would be on the 2nd level, which provides a great deal of privacy to families. This would be really important to potential buyers as well. Houses are getting crammed in Portland, so at least give them some opportunity to have a bit of privacy.
The height should be from street or sidewalk, if not the highest point on the site. Height is not a negative to me. I see a problem where the street height is higher than the back of the lot.
I support no more than two stories on standard lots.
Agree
OK.
Move in positive direction, but should also include provision regarding height at setback as opposed to height at center-line. 30 feet at 4' from property line has an adverse impact on existing homes.
Additional height should be allowed for duplex/triplex to encourage density
Stop allowing the obnoxious "skyscrapers" in our neighborhoods!
Please continue measuring height from the highest point near the house. Better, increase the allowed height of houses on standard lots.
Wow! I'm allowed a 2.5 story house on my lot! How very generous while you demolish houses next to me and build a 9-10 story structure with 90 units and little onsite parking, forcing the occupants to use up already crowded street parking in my neighborhood. Oh, as long as I use SMALL dormers on my attic expansion, I'm allowed to open up my living space upstairs. Thanks, Comrade! Whatever happened to personal property rights and owning your own land? Your permitting process will make it well-nigh impossible to live in an existing building, and will force most homeowners to raze and rebuild structures. But isn't this the idea? Wiping out single-family detached housing on the East Side of town for your developer friends? Strangely the West Side is largely unaffected by the RIP regulations.
I remain skeptical about "small" dormers--aren't these allowed to go the full length of the house; put 'em on those attics with low ceilings (see above exemption) and you've got another story! Developers must be wholly wink-wink on this one.
Two stories, not two-and-a-half.
I'm okay with a few SMALL dormers.
I do not care about this.
Agree.
OK, but proposed FARs in SF zones are too low.

This makes sense as builders simply backfilled to create the right numbers needed for their giant homes.
Yes! Change to lowest point which is the effective perceived height.
No
Measuring height from the lowest point near the house could be problematic for houses built on a hill. Is that really the fairest approach?
This seems like hair splitting. Houses can be safely constructed well above an arbitrary 30ft line, no matter where it is measured from.
I support these changes
Ok
no rip, as it makes homes unaffordable
Regarding bullet 2, Measure height from the lowest point near the house, not the highest point, though I support the concept, I object to the specific proposal and urge one of two revisions: A. Keeping 33.930 as is, with the starting measuring point at the highest, not lowest, point; or B. Measuring height from an elevation point that is the average of the lowest and highest points. Measuring from the lowest point would be too severe, especially because the proposed FAR limits will go a long way towards reducing the perception of new buildings being too large. I support bullets 1 and 3 as proposed.
If narrow homes are to be built, they must be tall enough to allow residents stand up in on both levels. However, many of the current "skinny houses," are appalling to look at, in part because of the too-high to too-narrow ratio, and also because of poor design and poor quality materials. In order to support narrow homes, I believe there should be a design and materials review board. Portland needs to require good design and quality materials for newer / smaller designs to be incorporated successfully and sustainably into existing neighborhoods
This again should match what is currently the norm in the neighborhood. There are some neighborhoods that look lovely and have single story ranch type homes and a 30 foot house would be not in keeping with the neighbors.
No opinion
I am for these height measurements. I am against how this is used and manipulated in the Proposed Overlay Zone
see above comment.
Do not change our zoning
all sounds fine.
Do not impose height limits
Bad idea. Build homes as big as the market will bear.
I'm not opposed to how the height is measured. Would this be the same for the commercial zones and the multi-dwelling zones? Because measuring height differently in only these three zones is totally untenable. It's bad enough height is already measured differently for the zoning code than in the building code.
I agree with this part
My house is a 1-story at grade in the front with a walk-out basement in the back. The street facing facades (corner lot) are both at the level of the first floor or higher. The lowest point near the house would not make any sense for this case because no one would see it from a lower angle, well except the as cheap as you can build skinny house's deck 5' from my yard, hovering over my sunken patio...Anyway, I think you need some exceptions. What constitutes a small dormer?

I am VERY supportive of measuring house height from the lowest point, not the highest point, and I would urge you to recommend these standards for R1 zones as well for consistency in the code.
Yes I support this.
allow 3 story houses
Keep the limited sunshine shining on our sidewalks, streets and greenery. NO TALL IN-FILL!
I am particularly happy with the measurement of height from the lowest point instead of the highest point.
all right for this
Sure
I'm not sure that 2 1/2 stories is a good idea. the other standard is fine. But too many times these new houses are much higher than the ones around them.
Yes, we need to limit to protect solar investments. The state now wants all new homes ready for solar. Buildings too high will restrict production.
Don't make this change in my community at all. In addition, what if my house burns down? Why won't I be allowed to rebuild it the way it was, or even make improvements? It is so wrong to apply these restrictions.
i agree with all
Seems fine.
Project needs a 6 month delay.
Yes, 30ft sounds reasonable. 3 story SFR would be useful in Rose City Park neighborhood.
Good
Fine.
I would keep measuring from the highest point. Otherwise people on a slope get less house.
We need smaller homes in the city because urban jobs pay a lot less than suburban jobs. Building large expensive homes far from the job centers of Beaverton/Hillsboro, Tualatin/Wilsonville and Vancouver is just plain stupid.
Not necessary.
Measure height from the average of the lowest and highest point, which is more in keeping with the way the building will be perceived in the streetscape. Consider measuring this only along street-facing facades for the same reason (i.e. downward sloping backyards would not penalize you).
I support that part of this proposal that would measure maximum height from the lowest point near the house.
Residential has had a decrease on allowable area, yet commerical/residential zoning abutting has increased. The the bigger picture, the relationships seem incompatible between adjacent zoning.
Measuring from the lowest point hurts steeply sloped lots a lot. Maybe measure from the average height of the lot or the average of the lowest and highest point?
I disagree with this change in measurement. I believe height should be consistent with building code definitions and be measured from average grade plane to average roof height.
Again, anything that will negatively impacts the needs of the city, more housing and more revenue, I can't understand why the city would be working against it's own interest and goals.
I no longer support the RIP, regardless.
Agree
This seems like a reasonable idea, relatively indifferent.
Clarification of where the low point is measured on sites with grade changes should be provided to avoid loopholes. Small dormers should be specifically defined to avoid loopholes.

limit maximum height to 25 feet to protect sunlight rights
No
What is the problem with height? This seems to be the easiest way to add dwelling space. It could be done by increasing the number of attached (internal) units allowed. The result would be additional housing without changing historic character.
A distraction meant to look good while developers run your department
Agree
No comment except that if setbacks are reduced you may end up with restricted sun access due to adjacent building heights.
let more height in as more units are created per lot
This will result in very houses. No more pretty views. All we'll see is house.
Trees have always been a priority for Portland - these revisions and past revisions have removed many trees and heights of house have enclosed us w/ no sunshine

**3. Improve front setbacks to better reflect those of adjacent houses (R7, R5 and R2.5 zones).**

- **Increase front setbacks in R5 and R2.5 from 10 feet to 15 feet.**
- **Allow a front setback reduction to align with the house next door.**

Good idea
I am not a fan of this. Please do not increase the front setback to 15. This will potentially jeopardize yard trees behind the house.
This is not necessary and will only reduce building options and prevent increases in density and affordability.
I like this. My kids liked to play in the front yard.
If this is a choice, great. But if it's a requirement that the setback of all new houses align, then that seems too monotonous.
Reduction of setback to align with house next door will probably not be a good idea if the house next door is one of the newly constructed McMansions that are built so close to the street. Using such a home as the baseline will result in a wall of houses close to the street.
Aren't these two proposals in conflict with each other?
The exception to match the house closest to the street will eventually result in an uneven streetfront, or worse all the houses on the block being closer to the street. You just need one to get the process started. Remove this exception.
Again, I support this, given my concern about providing room for environmentally beneficial landscaping.
Very good!
Great if you live on a decent city street with sidewalks and the like; not at all acceptable when you live on a crappy unimproved road with no sidewalks and small lot size - I am against this
This will be a huge improvement.
Oppose. Why further constrain property rights and personal freedom for one subjective preference over another, especially when you are reducing property rights instead of expanding them.
what if the next door house is practically on the street already?
This cannot apply to houses on the corner ?,if it's to align with the house next-door which house?
FOR

okay
If diminishing front setback is also reducing outdoor space, it's not a good choice.
At a minimum 15 feet - ideally 20 feet.
Sounds good
Yes, sounds great
Agreed
Leave this along. City if trying to make us stepford houses, we walk alike, we talk alike....
Use average of setbacks on street. One size does not fit all neighborhoods.
I do NOT support an increase in front yard setbacks. I do support setback reductions to allow new or altered homes to match their surrounding neighbors.
like increase in setback minimum- again - should be restricted to current footprint- otherwise if a megahouse has already been built- that means the whole neighborhood eventually can be turned into yardless monstrosities
I am very happy about this, because, in many cases existing houses are more than 10 feet from the front property line causing new houses to stand out if built to the 10 foot setback.
I think this is helpful to maintain some consistency in the look of the neighborhood.
This will have less effect but it is making houses smaller again, which means less affordable housing.
OK
agree
Don't increase setbacks to 15 feet. Allow maximum flexibility and different building typology by reducing setback requirements, especially in 2.5 zones.
Don't increase front setbacks. Some people may want a larger backyard, and others may want to build a larger house that's a duplex, triplex or quadplex.
Usually ok.
This is fine
The current setback regulations are adequate. With the shrinking lot sizes here in Portland this would mean houses would have to be built at the back of the lot. People want to have a backyard this might jeopardize this.
Why? What goal is this change trying to achieve?
Would prefer this be kept at 10 feet, but this is a reasonable compromise.
Yes to allowing front setback reduction. No to increased setbacks. Front yards are not necessary.
seems OK
Disagree with this proposal. Front yard is most wasted functional space and increasing this distance reduced livability on development site
Great
Better then existing, but if you allow neighbors to adjust forward in time you've established the exception as the norm. Nix the waiver.
Ok
Why? How does this help anything? Ten feet seems like plenty of set back and leaves more room on the lot for an ADU or such. My 1894 home is ten foot from the sidewalk and is a comfortable distance. You should make an exception for front porches. Allowing them at ten. It might encourage front porches which are good for Neighborhoods.

This will render smaller lots (40x50, 50x50) unbuildable. The goal is to increase housing options and density, not reduce options. New houses are not old houses. They do not have to line up exactly like the older homes. Houses that jog along the front setback creates visual diversity.
please do not increase the setback.
Increasing setbacks will make it more difficult to add backyard ADUs. Front set-backs are a suburban aesthetic; we should prefer eyes on the street.
Increase setbacks to match adjacent existing homes, no numeric standards. Increase setbacks for corner lots for traffic visibility. Increase setbacks for properties without public right-of-way planting strips in order to allow for large trees. This is not about "options" or "luxury" of residential outdoor space. Without public space for planting trees, and with increasing rate of reduction of space on private property, BPS policy is increasing risks to public health and creating a conflict with Goal 2030 Objective 13 of the Climate Action Plan.
I object to reducing zones in R5 to R 2.5 it will destroy the neighborhood, destroy green space, and promote destruction of older homes. Otherwise this seems OK.
Increasing the setback will make the houses taller, shading more yards. This is a bad idea.
Disagree! This makes the backyard smaller!
Great
This is great.
Should depend on how close the house next door is to the front setback line. I think it is good to have 15 feet as the front setback line.
As a front set back tends to be wasted space I would be more inclined to reduce the set back to 5'.
Not important if it stops any housing from being built.
yes.
more individual yards, not communal for complexes, just another way developers maximize square footage for the bigger is better mindset which usually is a temporary owner/renter. also take into consideration an aging group of portlanders who will be looking for the soon to be extinct on level home with a small sanctuary of a yard to relax in...
This is too strict, as front lot lines should be allowed to slowly move toward the street. How about any house within 100 feet on the same block?
Do not increase the front yard setback to 15 feet. Doing so reduces the amount of developable area and many inner Portland neighborhoods have done fine with 10 foot (or smaller) setbacks for the past 100 or so years. Why change this now? Even with the allowance to match adjacent existing setbacks, this change doesn't make sense. Don't we want people to have eyes on the street, have front porches that are visible, etc.? Rather, why not retain the 10 foot front yard setback generally and then require setbacks to match adjacent houses when they have bigger setbacks to ensure compatibility in areas of town that have more suburban style development (SW, East Portland, etc.)?
might consider one of the four sides of the lot, that the setback could be less if 1. no neighbor had a problem & 2. a reciprocal amount is added to the opposite side
Increased setbacks very appealing. A way to encourage more plantings as well.
how about allowing a min 10' to max 15' range depending on neighboring houses, but matching setback is not mandatory. That way home owners can plan on leaving enough room in the back of the house for future ADU etc.
Yes! There needs to be more space in front of homes. I would also like to see increased distance between homes (i.e., I'm not sure how far away a home has to be constructed from a neighboring home today, but often I see homes that seem way too close together).
Good

this is fine
12 feet instead of 15. Decreases the ability to create more housing options.
If you allow front setback reduction to align with the front door of the new home that was just built with the 10 foot setback then why even change the rule when you are providing a clear way to get around the rule?
Yes!!!
I support a context-sensitive approach
No, don't align with the house next door, as that would allow new builds to include a 10-foot setback, if the new build was next to another new build. All new builds must be 15 feet (or more).
Ok
I think setback uniformity is overrated. In infill situations, questions like where the house should be located for tree preservation, utility location, etc., are way more important than abstract setbacks. Flexibility should be prioritized.
All setbacks should be 15 feet, regardless of the house next door
Front yard setbacks should be 15' minimum.
Newer infill is not set back far enough. Allowing the next house to be similar only compounds the problem. 15 foot set back matches the neighborhood
Yes, no setbacks shallower than adjacent homes. Period.
What if the house next door is a recent construct that is completely out of scale with the rest of the older homes on the block?
No reduction to align with the house next door should be allowed if the house next door is a recent structure set forward of most of the pre-existing neighborhood houses.
I think this first bullet point would be a mistake. 10 feet is already a large front setback. A smaller front setback better contributes to a neighborhood, community streetscape. A 15 foot setback setback seems like a reversion to 1950's suburban car-oriented planning. Very Un-Portland! This seem highly inappropriate, especially in the more urban areas of Portland. An unnecessary code change in my opinion.
A good step. We need better setbacks and room for green infrastructure (trees). Make steps to infill, not redefine neighborhoods with demolished homes and poorly and expediently built over priced homes.
YES to increase in front yard setback. Uneasy about exception to front yard setback. By allowing such one promotes erosion of neighborhood character.
Yes
yes
Setbacks should be relational with adjacent homes as well
It's unnecessary to increase front setbacks -- we should be focusing more on increasing the # of allowable units in residential zones.
same as above, setbacks should reflect current neighborhood allowances.
Agree
Yes!
Setbacks should be waved when house features more than one unit. Setbacks are less important than ensuring sufficient space for trees (a house shoved up against one side of the lot will result in more contiguous open space)
Ok
Exactly match existing setbacks of adjacent houses.

seems reasonable if the house next door reflects the rest of the homes on the street
This should also be proportional to the other houses in the neighborhood, not just the house next door. By allowing the setback to align with the house next door, you are slowly decreasing the allowable throughout the neighborhood (particularly in older neighborhoods where there has been a rash of undisciplined building with reduced setbacks).
This is a purely aesthetic choice and will limit property owner options in placing the footprint of their home. Also, it is impossible to enforce retroactively, thereby nullifying intent in established neighborhoods. I oppose.
This is retrospective and silly. Why should we design houses in 2017 in a certain way because it made sense sometime between 1900 and 1960?
good
ok
Why are we excluding land zoned for housing from homes. You should allow houses to build to the property line so the land can be well used.
I agree
Most buyers prefer a larger backyard and don't want this setback. Again - older homes in North Portland don't align so don't force new ones to.
Yes!
Keep zoning as it currently stand!
I disagree with the allowance for aligning with the house next door. An attractive streetscape includes variances in house alignment -- not a regimented straight line.
Do not allow a setback to align with house next door...if there a lot of new homes with 10 foot setbacks the req of 15 feet means nothing if the new home is being aligned with a existing home that was built in the last ten years with a 10 foot setback
Love it!
Houses built closer to the street than other houses on the block create poorer contact between neighbors. Neighbor relationships are a cornerstone of livability.
Align with house next door. Keep existing setbacks. Require off street parking for 1-2 cars.
Yes!
Allow a garage to be set on the front property line. Do not require an off-street parking space where there is no curb cut (apples to infill on vacant lots).
Allow a front setback reduction
I only agree with this for Single-Family homes. Otherwise, it's counter-productive.
Why is this written in complex jargon only City planners can understand? This seems like it's done to make sure you can push through your agenda. What are the implications of this? What does it mean in real life? How will it change the face and character of our neighborhood? Why did you designate only the areas with the cheapest and smallest homes? Why not encourage knocking down the giant homes on the ridge and replacing those with 4-plexes?
No...leave setbacks small to allow more ADUs or larger houses on smaller lots.
Yes
That's better. It reduces livability when you feel like you're downtown, with houses too close to the street. when you're looking at "aligning with the house next door," are we using a worst case scenario or a best case one? It is not good if earlier, more generous reductions are used to penalize the neighbors.
great

This doesn't seem that important to me compared with other issues.
Infill so far in my neighborhood did not account for setbacks of houses nearby, so anything new built next to an infill house already there that is too close to the street should NOT be used for any future setback measure.
Yes.
I think matching the setback to the neighboring houses on the block is very important for conformity.
I think this is OK; I do not know enough to know whether increasing the setback makes sense everywhere.
Makes sense
New subdivisions should be exempted from this front setback requirement if the setback is placed on the side or back. This is similar to what Seattle does.
I support these changes.
Yes.
This is not an "improvement". This is a degrading of the urban streetscape. 10' is plenty of setback for houses. We need the houses toward the front in order to have more backyards, for recreation, but also to leave space for those backyard ADUs we're trying to encourage. Many older houses have even less than 10' setback. If you really want to placate the residents of the South Burlingame neighborhood, only increase the setback if no houses in the neighborhood are closer than 15'. Otherwise, allow everyone in older neighborhoods to build within 10' of the P/L. Or, at least, allow the house closest to the street within a 2 block radius, or even on that block, to dictate the minimum setback. The current "adjacent house match" limitation is too limiting and capricious.
I recommend and would encourage the city to keep the setbacks set at 10 feet. Increasing the setback will discourage and, in some situations, make it impossible to increase residential density.
This is reasonable
It's a good idea to increase the front setbacks. It is not a good idea to allow a setback reduction. All that would happen is that one building with a smaller setback would be the excuse for builders. 15 feet is a good minimum.
This ruling is fine for new development sites in Hillsboro or Happy Valley. Neighborhoods in Portland already have setbacks established and regulated.
Front of houses must stay in line with current houses
I don't think it is necessary to allow for a front setback reduction to align with next door houses. New houses are already too close to the street. Future houses should be set back further.
On corner lots where front and sideyard setbacks, define parameters where front yard setbacks apply on both street facing sides of the lot. This reduces the impacts to the houses next door on both streets. Safe crossings for pedestrians at street intersections are better accommodated when sightlines are clear. Fenced sideyards obstruct the clear sightlines at street intersections.
Disagree. Front yards are generally not safe for children to play unsupervised, given the low fence in the front yard standard. Increase the rear setback instead.
I strongly object to this provision, not only because it will doom my planned home renovation, but also because it is contrary to sound urban design. Pedestrian-oriented urban design would encourage smaller front setbacks to create a more human-scale "outdoor room" along the street that increases pedestrian comfort and calms car traffic. Increasing the front setback would be a suburban policy direction and require people in new homes to spend time and money maintaining 5 additional feet of front lawns. While many Portland neighborhoods have these deep setbacks, why encourage them? Furthermore, it appears that the rear setback will remain 5 feet, almost ensuring that new buildings

will be overlooking other people's private backyards. This setback regime is contrary to millennia of human settlement. I'm not sure why it is being proposed.
Setbacks are a terrible waste of space. Increasing front setbacks is particularly wasteful as it makes backyards smaller and less usable. We should be eliminating front setbacks altogether to allow for more flexibility in unit placement on a site.
I agree that to improve the quality of the neighborhood and maintain the historic characteristics of the houses setbacks should be 15'. I do not however, believe that front setbacks should be reduced.
Not necessarily good for all neighborhoods and streets. Some setback homes leaving greenspace in front are attractive in some neighborhoods. See for example 425 SW Bancroft.
Prefer to leave at 10 ft. set backs. There are instances where it would not make sense contextually to move back to 15 ft in relation to neighbors houses that are closer to street.
An improvement at least on the front setback.
these provisions seem arbitrary and bound to cause confusion and feelings of unfairness. Why do cities need larger setbacks on smaller plots? It complicates and goes against the provisions for adding housing density to plots.
No more increased setbacks are necessary. You should already have a variance process in place to consider reductions on a case by case basis.
No. See above.
Increasing front setbacks will definitely make the front of houses more aesthetically pleasing.
agree
Proposal needs to be finer grained. Should only allow smaller front setback only if most nearby houses have smaller setbacks, not just adjacent house.
Side setbacks are key for site access, but front setbacks steal space from private backyards, increasing front setbacks will only increase driveway/walkway lengths thus increasing paved surface area. No.
Support
i am not sure why we would create a new standard that reflects something old.. whats the point?
I opposed setbacks limits because they add to the cost of housing, and are not necessary in anurban environment (where other forms of shared space are available).
How is increasing the front yard, which tends to be wasted space used for lawns, which require intensive water, an improvement? By increasing the front setback, you effectively decrease the back yard space, which might have otherwise been used to build an ADU when now, with a bigger front setback, there will be fewer lots on which an ADU can be built. Why is Portland implementing regressive urban design standards?
As someone who does not have a significant setback, this would be helpful for those who are light sleepers.
If only. Every contractor does what he wants.
Yes, increase setbacks. No to "aligning". That is a giant loophole that leads to deteriorating the standard and community livability.
The front setback increase in R.2.5 & R-5 is an improvement. I also support a reduced front setback for purposes of alignment, assuming that the word 'alignment' is clearly defined. Front setbacks that are complementary to nearby houses are essential in all single-family residential zones. I
Please continue to allow setbacks of 10 feet in R5 and R2.5 zones. This change effectively reduces housing size, which works against Portland's goals for housing affordability, safe transportation choices, and climate change mitigation.
Yes, we support generous setbacks in the front to protect the visual nature of historic properties and to protect trees, which are often in front yards. We would allow a front setback reduction to align

with the house on either side of the property that has the greater setback. Otherwise, a property developer would be able to align a house to a neighbor on one side, while negatively impacting solar and visual access to a house on the other side. We support solar access regulations so that neighbors cannot rob the solar resources of neighbors.
This is imperative in residential areas and helps with safety so people can see the street and who is walking or sleeping in the neighborhood. I am all for density, but allowing commercial buildings such as the E. Burnside block at 12th to cut heritage trees to build a larger footprint is negligent on the cities part to only charge a fee. Not only does it violate the city's goal to reduce heat island affect, BPS can check arial maps and see the trees. Shameful. Also, large commercial buildings with narrow public sidewalks make sidewalks less comfortable for public use...tables, walking, conversations, seating. Active pedestrian places make livable cities and friendly!
Yes
Do not allow front setback reductions below R5 and R2.5 requirements!
YES!
In the Eastmoreland neighborhood, keep the setback established for the neighborhood. These setbacks are historically consistent, and contribute to the entire neighborhood "look." 33.540 Laurelhurst/Eastmoreland Plan District 33.540.010 Purpose The regulations of the Laurelhurst/Eastmoreland plan district enforce the special setback requirements of Ordinances 70343 and 70341. This plan district maintains the established character of the Laurelhurst and Eastmoreland areas, characterized by homes with larger than normal building setbacks from the street. 33.540.020 Where the Regulations Apply The building setback requirements apply to the Laurelhurst/Eastmoreland Plan District as shown on the Maps 540-1 and 540-2 at the end of this chapter, and on the Official Zoning Maps. 33.540.030 Required Building Setbacks Required building setbacks are shown on the Special Building Setbacks maps available for review in the Development Services Center.
yes
Yes
yes...set way back..in fact, don't demolish to begin with, and you won't risk being that type of developer
I'm opposed to increasing front setbacks as a general measure--unless its to align with the house next door.
Yes
OK
agree with set back proposal
Qualify the allowance for reduction for alignment with older homes, not the new, large ones that take up almost the entire lot.
This would be an improvement. Allow variances where appropriate.
Ok
Add R7 to this list. Eastmoreland homes traditionally have strong setbacks. The new homes coming in after demolitions of more affordable housing take up the entire lot ( limited setback) and look totally out of place. They destroy the historic character of the neighborhood.
Setbacks should be the same as the neighboring structures.
Setback should be compatible with original property or neighboring properties.
I think there should be a setback of at least 10 feet?
Agree

Should be a minimum of 15 feet in all cases, including corner lots.
What about the rear setback??? I do not want gigantic homes built, two to a lot, on what was previously a single family home lot, with a backyard so tiny, the new giant house is practically in the backyard and side yards of the neighboring existing homes.
Keeps feeling of congestion to a minimum and improves visual effect
yes
I like it in theory, but I also worry about having less space on which to build. I'm all for whatever raises our population density the most. We need to build at least 100,000 new housing units in the city to accommodate TODAY's demand, much less any demand between now and 2035.
Not in favor of reducing the setback for alignment. Standardize to AT LEAST 15 feet.
I approve of this proposal.
Front set backs should all be at 15 feet.
No reduction to align.
No. Setbacks should be minimum ten feet, maximum 30 feet.
I prefer the pedestrian experience of walking through neighborhoods with small setbacks. Large setbacks feel suburban.
Allow zero front setback if a shopfront is used for the building frontage. How many excellent foursquares with shop front additions are ther in Portland. These are an excellent live/work building type.
This makes sense.
Allow front setback reduction to align with the house next door.
I think setbacks are fine, and could even be less.
Agree
Objective!
Bigger the setback, the better.
Neutral
REMOVE THIS. This reads like classist, stupid drek which could very much limit overall FAR that could go towards more units and affordability. These sentiments above seem classist and limiting, unless of course you already OWN property in those neighborhoods
This is ridiculous NIMBY policy, bad policy.
This is unnecessary. Larger front setbacks mean larger front yards (and consequently smaller back yards) and more pressure to keep those spaces landscaped as they are visible from the street, fenced in for animals, etc. This leads to a greater physical/monetary burden for many residents.
Good.
Single level living is desirable. By increasing setback you push living space onto more floors, which is annoying for the able-bodied but exclusionary for the disabled
The allowance of aligning with the house next door makes this proposal workable.
no
ok with this
E
not sure increasing set backs will be a net positive in the reach for increased housing/affordability. seems a measure meant to preserve Portland's dominant suburban character.
Generally approve with the 15 foot setback, but also need to allow deeper setbacks to match setbacks on adjacent houses.

Front setbacks need to align with neighboring homes- so if this is what this proposal is actually proposing, that this is a sound idea. If it just takes the base zoning into account, then you could still wind up with a house that has a 15 foot setback when all the neighboring homes have 20 foot setbacks.
Front setbacks should match the existing houses on a street-by-street basis. Not "one size fits all."
If you are allowing a front setback reduction to align with the house next door you should also allow the set-back to be bigger if the house next door is such.
I don't see the point to this. Let people build what they want.
I don't like this. The best Portland neighborhoods have low front setbacks (Sunnyside, Buckman, Richmond). Also makes a narrow corner lot with the "front" street on the long side infeasible.
I support an increase in front setbacks.
I support adopting this for single family homes but leave 10 feet for multifamily.
Good proposal. In my neighborhood there are a several contemporary houses close to the street that don't blend well with this 100+ year old neighborhood.
OK
Front setbacks of 10' are more than appropriate for the scale of existing neighborhoods. Back yard setbacks would be more helpful.
This should only apply to garage fronted homes, front doors and porches look good close to the sidewalk
#1
Please do not increase front setbacks. Again, all these new regulations will just hinder new development and worsen the housing crisis you're supposedly trying to solve. You need to deregulate so that more housing can be built.
This measure is to supposedly bring all houses into some sort of common scale. In theory it looks good. However, existing housing doesn't meet this requirement and part of the character of the old single-family detached housing is its variability. If you want a uniform look to the neighborhood with homogeneous housing types and sizes--say, after every existing house in the neighborhood has been demolished to sponsor such uniformity--then you have jettisoned your supposed commitment to retaining neighborhood character. Portland will rapidly look like every other city. Oh wait...it's looking more like every other city already thanks to similar policies.
See the UNR recommendation. Some setbacks rules here are good, need fine-tuning or additional, tho.
Allow a front setback reduction to align with the house next door only if the house is over 25 years old-Nothing that has been built in the last seven years, certainly.
No reduction, just align with neighbors!
I approve of this.
Agree.
15 feet is just as arbitrary and meaningless as 10 feet. This is simply going to sow confusion. Instead, why not propose that infill houses simply align with the furthest back for whatever is next door on both sides, and if nothing is next door, on either side, then leave it at 10 feet.
yes please, consider even more of a set back.
Yes
Once again, land costs money, and taking another 5ft away from the developer's usable area discourages large lot development.

<p>this will either reduce private backyard space or livable space. I'm not in support of this! It's an unnecessary supply restriction that our most expensive and desirable old neighborhoods did not face. It makes a neighborhood less dense and thus less walkable.</p>
<p>I oppose increased front setbacks</p>
<p>I support these changes</p>
<p>In setting with the neighborhood would be best.</p>
<p>setbacks are good, make more of them, as you are making portlanders poor with rip</p>
<p>Don't increase setback.</p>
<p>Yes</p>
<p>Regarding bullet 1, Increase front setbacks in R5 and R2.5 from 10 feet to 15 feet, I object to the specific proposal. I urge retaining the existing, lesser 10-foot setback in these base zones. Deepening a front setback is too constricting of buildable envelope as part of the overall proposal imposing FAR and lesser height limit. Second, it's simply not the case that, "The larger front setback requirement will increase the likelihood that trees in the front yard are retained." Title 11 is the policy and regulatory instrument for tree preservation, not a Title 33 minimum front setback standard. I support bullet 2.</p>
<p>I agree with the idea of increasing front setbacks from 10 to 15 feet. However, I do NOT agree with the idea of reducing front setbacks to align with the house next door.</p>
<p>This sounds like a good idea.</p>
<p>No opinion</p>
<p>I am against increasing the front setback requirements. Adjusting the front setback to align with adjacent houses is currently allowed by code. No reason to make these changes.</p>
<p>yes, should comply with what the neighborhood standards are that exist.</p>
<p>Do not change our zoning</p>
<p>seems fine.</p>
<p>Do not increase set backs.</p>
<p>Not important.</p>
<p>I like this idea. It will help with blending of new development in existing neighborhoods.</p>
<p>Sure but I'm not sure what this accomplishes.</p>
<p>No quibbles</p>
<p>I am very supportive of the proposed setbacks to help integrate new projects into existing neighborhoods.</p>
<p>That will decrease backyard space, limiting gardens, space for children to play, etc.</p>
<p>Neutral.</p>
<p>ok</p>
<p>I support these proposals.</p>
<p>I think the setbacks should not be necessarily based on neighbors. Otherwise we get cookie cutter neighborhoods like in the east.</p>
<p>Nope</p>
<p>yes</p>
<p>Yes, some new houses going in have no room for driveway, and setbacks allow for trees, shrubs, etc.</p>
<p>front set backs to 15 feet.</p>
<p>Seems fine.</p>

project needs a 6 month delay.
Not a critical need.
I am concerned that this will discourage the addition of front porches to existing houses. In my R5 neighborhood there are many houses built within 18 -20 ft of the sidewalk. Adding a front porch would violate the proposed 15 ft setback. Porches are an amenity which should be encouraged. Porches have been added in recent years to some neighborhood houses. I am concerned that some owners might be discouraged from building porches, or be required to go through the adjustment process for something which would undoubtedly be approved anyway. Language such as the following would be appropriate: In the case of existing houses, which do not have porches, allow porches to be added which extend into the front yard set back, but not closer the 10 ft from the sidewalk. Such porches may only be one story in height.
Support
Yes, it should be contextual. Not max out property lines, but also not create useless grassy area in the front of houses.
I support this as it improves the comfort for the pedestrians/supporting walkable neighborhoods, but there could be option for getting a variance in some circumstances.
Don't increase front setbacks. It makes it harder to squeeze everything in and still preserve trees. Why are you making things more difficult if the goal is more housing?
We need less dense housing in the city because we do not have the job growth of the job centers of Beaverton/Hillsboro, Tualatin/Wilsonville and Vancouver. We have terrible congestion caused by people driving to their suburban jobs from their expensive Portland housing.
Not necessary
I think this is a waste of valuable land. We should be thinking about the housing demands of the next 50 years and the climate change refugees that will be moving here. Taking another 5 feet away from property owners decreases their options with what they can do on their property. There are plenty of wonderful, walkable streetscapes with 10 foot setbacks.
Wonderful proposal to allow for setback matching with the existing fabric.
While I don't take an issue with increased setbacks, I think the minimum should match adjacent homes, especially within a block interior (not corner lots). I live in a house with a setback greater than 20 feet, and would want any neighboring house (if built) to have a similar setback.
With every proposal, what are the real impacts. On a R5 lot that is standard size 50x100, I don't see this proposal as a negative. Realistically, how many 50x100 lots are left in Portland? Specifically, I will address R2.5. This is high density single family, all near mass transit. When you limit the height, limit the size, increase setbacks... how do you accomplish your goals. I would suggest there be exemptions for lots less than 100' deep AND that include an ADU. New construction with ADU's should be given much more latitude. Example, on a 50x50 lot, increasing the front setback is significant and I think the city really needs to address their goals and the impact on ALL scenarios before anything can be ratified. The impacts must be measured from all angles, housing, revenue, livability, etc. Also, what impact will these new regulations have on the developers and their incentive to stay in the city. I know several builders, large and small, talked to one this morning who are flat out done building in our great city. Is this what we want?
Agree - allow setback reductions to align with neighboring houses
This makes sites less livable and reduces options by taking away backyard space and reduces site use options. The city has all kinds of existing structures at various setbacks over the years. Natural demand drives use. If sites too close to street are not liked then people will pay less and builders or home remodels won't build that way

I like the idea of a front setback reduction to align with houses next door. I am fine with the idea of increasing front setbacks from 10 feet to 15 feet if it stops NIMBY folks from griping and allows us to increase density overall. It can be a good bargaining chip while not sacrificing more important things.
do not allow a set back reduction. If 15 feet is the desirable standard then adhere to it for all situations
Next you'll ask for everyone to dress the same, so everything is equal? Again no, people like being different.
Matching adjacent setbacks should be required, not optional.
Development will be pushed forward if one house is out of alignment with the neighbors. Another gift for developers
all new construction from demolitions will be built out to extreme front possibility if one house has less of setback than others. A GIFT to developers
Agree
I thought front setbacks were 20 feet? You need to have a front setback that at least allows a car to park in the driveway without blocking the sidewalk, especially if you aren't even requiring garages for new homes. Parking is getting to be a challenge because of your lack of parking requirements for apartments on transit streets. As to front setback reduction, which adjacent house do you align with? Standards need to be clear.
this is a classist, silly proposition. Let all buildings use their setbacks and lots as they can to increase units and density per every lot, ESPECIALLY on corner lots
10 feet to 15 feet starting at street or sidewalk.

**4. Improve building design (R10, R7, R5 and R2.5 zones).**

- **Limit the number of exterior, above-grade stairs that lead to the main entrance.**
- **Allow eaves to project up to 2 feet into setbacks.**
- **Require large, street-facing facades to be divided into smaller planes.**

Fine
There is no need for this change, it is not necessary and will only reduce building options and prevent increases in density and affordability. There is no compelling community or governmental need or purpose for the city to be micro managing minor design details such as these. The default attitude should be to say yes to allowing things, and no to requiring or mandating things.
I like this.
I agree
Sounds good.
Ok
So houses on adjacent properties with a 5 ft side setback will have the distance between overhangs reduced to 6 ft.- too close!!
Good approach.
In am seeing 3plus story houses on recent infill in my neighborhood. This has detracted from the livability and causes over crowding. The reason I purchased a bigger lot was for more privacy. My neighbors delveloped an unsightly 3.5 story row house into a single family lot. They also split the original house into two units. Now there are 4 families in the once single family lot. This has caused tension in the neighborhood and fostered a new project that completed across the street that is over 3 stories. Now the once stately neighborhood does not have a clear view of the park and has

devalued our home value. It is to a point where most homeowners are selling to getting out before more infil detracts from home value. This is poor planning and will get worse if it keeps going unchecked.
The character of neighborhoods will not be improved by the cookie-cutter nature of these bullet points. If the purpose is to increase housing stock, do not tie the hands of those who might develop it with arbitrary rules.
Good.
Seems like a nice idea, though less important than the size and setback changes.
Oppose. See response to No. 3. Let the market decide what people want. If it's really that unappealing, people won't buy it buildings will stop building it.
street facing facades should be divided; stairs limited.
This seems extremely regulatory
FOR
okay
I think the designs should match the rest of the community
Yes
Agreed
Not sure why we are doing all of this. Our city looks great with the variety of houses.
I support these changes.
"smaller planes" fancy talk for allowing small lots to be further subdivided- strongly against this. No eaves do not count into setbacks unless already existing in current footprint
I support this. Many developers expect to locate the house to max out the build able are width and then think about overhangs as an afterthought. I detest one foot overhangs on 2 1/2 or taller houses, so I think this will be a great improvement. Also, 2 foot setbacks are allowed in other neighboring jurisdictions, so this should not be a controversial issue at all.
Building design must take into account the structures surrounding it in order not to look completely out of place.
Why are we adding more rules about stairs? The eaves rule is a good idea for aesthetics.
agree
Why!! All this just adds more cost to housing that is already too expensive! Please don't require more design constraints.
Don't limit the amount of stairs. Eave projection is fine, but I don't think large, street facing facades need to be divided into smaller planes.
Ok
In theory this one is good, but it makes me a little uncomfortable when we start to make design decisions for unbuilt houses. My favorite neighborhoods in the city are those that have different housing types on the same street and I'd hate to dictate what style house a person should live in.
I agree with the multiple planes as it is more architecturally pleasing. However this could jeopardize development in areas with topographic variations ie sloped lots.
Why? What goal is this change trying to achieve?
These changes all seem practical.
Yes.
OK

I think allowing eaves 2 feet into setbacks is ok, but other design requirements are preferences and styles that change over time and people should not be further restricted on their choices o property they own.
Don't know
Great
Better than existing. Like the allowance for eaves to project up to 2 feet into setback.
No
I don't see why eaves couldn't come even further into setbacks provided it isn't creating a fire hazard
This is impractical in an upward sloping lot. What is this limit? Larger eaves are much better. leaving the max 12" projection of building features is a mistake. The 18" projection fits with historic houses. This was the best item in the entire proposal. In some cases you want to keep with historic development, in some cases you don't there is no consistency. Larger 18" projections fit with historic homes.
support!
Additional requirements: design review to match surrounding established neighborhood in height, setback, overall design.
I object to reducing zones in R5 to R 2.5 it will destroy the neighborhood, destroy green space, and promote destruction of older homes. No I do not want to be forced to regrade my existing old stairs just to repair them.
This is design review run amuck. Will the city start designing the houses now? There will be a standard Portland Plan and all new houses will look the same.
I agree with the eaves issue but the others are bad!
Great
This is great.
Whats the point of the stair rule? I don't find them especially unsightly. The eave change is much needed and the best thing I've seen in these proposed changes. The smaller plane requirement is well intentioned but leads to weird projections and dormers to make the rule work - look at any area under community design standards to see this in practice.
Not very important to me.
no opinion.
Eaves in setbacks (good) Broken up planes are more complicated to air seal, leading to less energy-efficient construction.
stairs requirement seems too prescriptive.
Agree.
great
Do not allow eaves into setbacks.
Agree
The first two bullets seem fine. I don't know what the last bullet means ("Require large, street-facing facades to be divided into smaller planes.")
This sounds like it would eliminate "boxes of despair" developments. So, good.
I don't agree with the city regulating the design of a street facing facade. Leave that to design professionals.
Allow stairs to be 5' from grade to front door. Gives more flexibility for partial below grade ADU's.

Yes, yes and yes! Some of the houses being built have absolutely no curb appeal. It's horrid. I would not want to have to look out my front windows at the barren wasteland that constitutes the fronts of some of these houses.
Keep Portland beautiful and unique! Provide smaller affordable homes as well!
What would the number be limited to?
Ok
I think visitability standards are important with regard to stairs and facades, but I think that the current proposal over-emphasizes aesthetics. I know keeping things pretty can keep the neighbors from griping, but getting people housed within their budgets should always be first and foremost. I care way more about whether my friends can afford to stay in the city than whether I have to look at a house that might be (gasp!) less than visually pleasing. Have as many or few street-facing planes as you want to have--there is no public good either way there. The number of planes on your front facade doesn't impact my ability to walk safely, sleep at night, or stay housed. Eave projections are fine.
This is just a beginning. There should be many other design changes implemented.
Limit the number of steps to the main entrance. Do not allow eaves to extend into setbacks. This negatively impacts the intent of the setback distance and limits buffering of adjacent properties.
Concern that these over-prescriptions stifle good design
Do not place the front door above ground level and number of stairs is no longer an issue. The rest of the neighborhood has doors on street level.
Add design review. Please stop ugly McMansions from being built on streets of 100 year old homes designed with architectural integrity and with similar design features.
This is insufficient. Given that our mental health is affected by badly designed buildings, a design review committee should create standards for and evaluate context and quality of materials and design. No short-lived materials too thin to block sound, no charmless buildings designed by engineers to maximize profit.
How will you define the limit on above-grade stairs?
What exactly does divide large street facing facades into smaller planes mean?
I agree with the projection up to two feet into setbacks. The exterior above grade stair limitation is completely arbitrary and one more minute code item that adds complication. Why not seven? Or eight? What if the front access is on a slope? The street facing facade provision could go either way. It really depends on the design direction, site, site elements and building access.
Design review should include appropriateness of the design for the neighborhood. This was the case in the town of Alameda CA where I moved from, which also contains many historic homes (of all sizes). Neighboring residents should have the opportunity to comment on new construction design and if there is majority opposition, the project should not move forward
Again, homes should conform to the overall look and feel of the existing neighborhood.
Yes.
All great ideas. Houses are currently being built with very steep stairs; deeper setbacks, reduced house size, and different design will encourage shallower (safer) ascent/descent.
Homes should reflect design elements in existing homes
Please also consider eliminating tuck-under parking that reduces building accessibility, distances porches from the street, increases building height, removes curbside parking spaces, and makes homes more expensive.

not sure why any of this is needed. I remember the ridiculous uproar over 'snouthouses' and don't understand how or why design can be dictated by opinions unrelated to the overall appearance of the neighborhood, which should be the only criterion.
Agree
Yes!
Only limit the stairs in buildings with garages. Allow unlimited stairs in the back of the building. Do not include eaves in setbacks at all. Disallow street-facing garages (or require substantial setback)
Absolutley but you dont go far enough in demanding that uncaring developers stop building black boxes and homes with 2 story flights of steps to the front door
approve
I oppose. Dividing facades into smaller planes adds cost to construction and inhibits design choices.
This makes sense
good except when eaves end up almost touching a neighbor. Not safe for fire reasons or privacy or sanity.
I don't quite understand all these terms, but sounds ok basically.
Why? Let people live in the types of houses they want
I agree
There are homes built in the 1900's - 1960's that have 13 to 16 steps. I don't know why new homes can't have the same? Again - see 4925 N. Princeton and 2 homes that flank it.
Yes
Keep zoning as it currently stand!
I disagree with allowing eaves to project into setbacks.
homes must fit the character of the neighborhood not putting large mcmansions where small cottage homes exist...square footage can't be more than 1.5 times of existing homes next to new home
Sounds like an excellent proposal (all three bullet points).
These seem like good ways to keep house proportions reasonable. I'm not sure about the projection of eaves, though. Would like to see a drawing.
No opinion. Keep any new construction in character of existing neighborhood. Focus higher-density developments along major transportation corridors (Interstate, MLK), not in the neighborhoods.
Uncertain why these changes are needed/wanted.
Thanks for the eaves change, will improve durability and service life of buildings.
Laut used to project 2 feet into setbacks
these make sense.
Why is this written in complex jargon only City planners can understand? This seems like it's done to make sure you can push through your agenda. What are the implications of this? What does it mean in real life? How will it change the face and character of our neighborhood? Why did you designate only the areas with the cheapest and smallest homes? Why not encourage knocking down the giant homes on the ridge and replacing those with 4-plexes?
This one is tempting but I'm still for less regulations. I did build a porch on my property just to break up the front face. But requiring it by law seems like too much.
Yes
Yes - it's good to have something that doesn't look like a six-pack motel, or a solid front.
great

Not terribly important either. I personally can't stand and wouldn't buy the newer houses with 15 steps leading up to the door, but if someone wants that, it's okay. Eaves are good and should be protected - they help shelter the house.
Agree.
I support the first 2 bullets, I support the 3rd if the housing is attached (rowhouse, townhouse, duplex, etc...)
Doesn't seem that important to me.
ok
I support these changes.
Yes.
Many older houses have 8 or 9 stairs up to the front porch. The 6-stair limitation would put a lot of older houses in non-conformance.
This has almost no impact on the quality of design.
How many stairs are too many? Difficult to comment when there's insufficient detail. In principle, this seems reasonable, though.
This only applies to McMansion type homes. Our current homes in the greater Portland neighborhoods already have clear established rules.
I am ok with these changes.
Add clarity to the eave projections - define measurement (Exterior face of finish building wall to the outermost edge of roof including gutters). Update calculation for site coverage area to include the area under the 'eave' as part of building coverage. Building code requires 1 HR fire ratings when between adjacent structures are 5 feet or less from each other. Two concerns to address: Projecting eaves present opportunity for fire to jump from structure to structure. In the case where two houses sideyard setbacks are 5'-0" each side and both houses eaves project beyond the setback 2'-0", the 6 feet remaining ((2)5 ft - (2)2 ft) may not adequately reduce the risk to fire.
Limit the number of stairs to what? What is a "large" street-facing façade? This standard could lead to much more excavation on sloped lots, where currently the garage is the lowest living area and the living areas are on the second and third levels. We need different standards for down-sloping lots and up-sloping lots.
The eaves idea is good, particularly for the side setbacks, but perhaps the 5-foot rear setback should not be allowed to increase.
The city should not be dictating style. Just because a building has an eave doesn't mean it is good. Just because a stair is long doesn't mean it is bad. I think we should allow eaves and other elements to project into the setbacks but otherwise you should not dictate style or form in any way. Breaking up a facade can make a design worse, especially in the hands of developers, builders, and others with no design training. If you want to encourage design, give incentives for people who hire architects to actually design their projects - don't make rules that preference one style or design over another. Subjectivity has no place in our zoning codes.
Will Excavation be allowed to lower lot? What affect to neighboring lots? Can main entrance be below grade.
Meh.
Really like the setbacks and divided smaller panes.
Another small improvement.
Getting close here. Everyone at our house agrees- we don't really care what _size_ the housing is, so long as it fits in with the neighborhood. And by 'fit in', we mean stylistically. We live in Concordia, and there's nothing worse than a street of lovely Craftsman homes with a huge, ugly, black box with

chrome handles, stuck in the middle. We feel the same way about the new building at Killingsworth and 30th- huge box, they made no effort to fit in. It's horrible. And that's one of the ways to get a lot of hostility from the people who are already here. *AND* it really is not that hard to fit in! There's several houses going up right now that are a late Craftsman, Portland Bungalow style. We've seen some that trim the porch and eaves to look like the neighbors. They paint colors like the neighbors! It really takes no more effort to look nice and fit in than it does to make the super-duper ultra-modern George Jetson ugly box. Might want to suggest it to them! (There are days I almost want an HOA, but then I look at our lawn...)
aside the eaves provision, these amount to little other than arbitrary visual impositions which should fall into the purview of the architect, not a "city aesthetic template"
Stay out of the architectural design business.
No. See above.
agree
Agree with no jetway stairs, etc
Disagree with limiting the number of stairs to an entrance only because, with new ADU/Multi-family typology options the 'basement level' dwelling unit should be allowed to have daylight exposure of half the wall height. This brings in more light to these units and decreases the need for light wells to accommodate egress windows.
support
it seems fine to allow eaves to protrude into setbacks if its deemed there is still enough room for emergency equipment. do we just think stairs and large facades are ugly? so subjective.
I do not support limit on stairs or requirements for street-facing facades. These kind of aesthetic/design requirements have a significant impact on housing and affordability and should not be considered in the midst of our affordable housing crisis.
There are many ways to improve the design of a building, but a blanket policy typically isn't one of them. If Portland is concerned about aesthetics, they need to do design review on each proposed building. I don't have particularly strong opinions on this one, but requiring street facing facades to be divided up seems utterly arbitrary. There are countless examples of great modern design without bays or orioles or dormers etc.
Yes, I support this.
Entirely flat facades that away from the character of the home.
Can the 2 feet reach the house next door? Especially if 4 houses are built on one lot.
Great! Thank you for supporting accessibility by limiting the number of exterior, above-grade stairs that lead to the main entrance.
Exterior stairs are fine as long as they fit the design guidelines of the neighborhood. We do not support relaxing setback regulations to allow for eaves. These types of allowances provide loop-holes that degrade the intent of regulations. A setback should provide for an area free of development among neighboring properties.
yes
good except for eaves extending -- adjacent houses with extended eaves would be nearly touching
not sure why stairs are an issue
yes
Sounds good
build on vacant land already demolished, not new razing

Allow eaves to project up to 3 feet into setbacks. I'm not sure why limiting stairs or smaller planes on street-facing facades are needed, but I'm always for improving design.
Yes
This one is also unclear
this is too restrictive
Yes, limit the number of exterior, above grade stairs.
Ok
Yes-limit those massive stairways. They make a house look like an apartment building.
See previous comments. Harmony and compatibility should be key.
Good suggestions
Agree
Yes on Eaves, absolutely. Limit stairs, yes.
Again, this is simply a ploy to somehow make the appearance of the new, crammed together houses, condos and apartments seem more palatable. You are still suggesting placing more than one house on a lot in a neighborhood of single family houses. I do NOT support this. If I wanted to live downtown, I would have bought a condo there, not a single family home with green space, trees and large front and back yards in a neighborhood of similarly scaled lots and homes.
Portland is not "Brownstone Brooklyn" Current designs are ugly and unfriendly
Do not allow eaves to intrude on the setback! That turns the setback into a joke.
This needs to go back to the drawing table.
Good but grade can't be built up at front stairs
Eaves should be allowable up to 3 feet. Breaking up facades on single family homes? They're not actually such large structures to begin with. What does this mean? Bay windows? Porch roofs? That's ok, but not just arbitrary "articulation".
Why? Especially the "divided into smaller planes" part. That just makes a facade feel jumbled.
The building code already does a decent job of describing how close an eave may be to a property line that is not abutting a public right of way. The setback requirement is redundant and unnecessary. Dividing street facing facades to be broken into smaller plane will not eliminate badly designed facade (and will likely produce more than a few lousy facets).
Sounds good. I'm worried that all these regulations will make it more difficult to build. But all in all I'm in favor.
The reduction of stairs is good because it will make it less of a hardship for people if they ever need to build a ramp to their door. The requiring of facade division is dictating design and should be removed.
Incentivize front balconies and porches to encourage outdoor street life.
Exterior stairs seem fine. Large eaves are good.
Agree
Why?
Stop with forcing ugly designs on neighborhoods. Designs should directly fit within existing designs of long time homes in neighborhood, not ugly new homes.
More detail on smaller planes please. The requirement for this on multifamily housing for the community design standards has created some incredibly ugly buildings.
Street facades are in the eyes of the beholder. A colonial style has same planes potentially as a modern house

I hate R10 and R7 housing. It's for rich people who don't care about poor people. I could give two shits about how R10 and R7 are modified if they continue to suck lot area and size for single family houses that no working-class person can afford
With the exception of the additional eave allowance, this is ridiculous NIMBY policy, bad policy.
"Require large, street-facing facades to be divided into smaller planes" How large would they have to be to fall under this rule?
Good
These are all good design changes that will increase neighborhood acceptance of new buildings.
This proposal effectively kills the idea of townhouses. We were in Montreal this summer and it is full of townhouses with many staircases to their multiple units. Builders put the stairs outside to create more space inside. We need more places for people to live and the placement of stairs shouldn't be a limiting factor. BTW: Montreal house prices and rents are about half ours. They have used townhouses to build enough density where people want to live.
Not sure seems restrictive.
How is this going to work on houses built into grades? Will stairs need to enter through the back?
building design changes listed above are all positive changes.
Generally agree, but limit the the maximum height of the first floor to be 3 feet above the lowest grade, 5 feet from the house.
The first two bullet points are sound. The last bullet point is too vague.
I support anything that can be done to prevent the cheap and low quality buildings that are being built everywhere in Portland. It really is shockingly bad -- is there no design review or design standards?
I appreciate your effort to limit the number of exterior stairs but the examples I have seen lately does not seem to make a great difference. They have just been divided into tow sets of stairs. I have often heard that the new buildings in neighborhoods will allow older people to downsize and stay in their neighborhoods. There are still too many stairs for old people.
Also oppose. Dividing large street facing facades into smaller planes will both increase the cost of construction (and thus sale price) and diminish the liveability on the interior of the home.
Not sure. I don't mind a triplex with three exterior stairs leading to the main entrance. Regulating design is tricky. I like the larger eaves.
I don't have an opinion about the building design. Flexibility can often lead to the best options.
Agree
Regulating building design has long been a failure. When the city moved stop attached homes in the early 90s developers started building skinny houses. The appearance of skinny homes were improved when garage regulations were put in place, resulting in homes with no parking. And on and on. Building/zoning regulations should be for safety and neighborhood livability, not design.
Below grade garages are helpful, stairs are needed to achieve this design. Design standards for "smaller planes" do not improve liveability, but do impede a designer's ability to advance with the times.
While I appreciate the intent of the last requirement, an exception should be made to allow flat facades like many historic salt box homes as long as a generous porch is provided.
#1 and #3
Please do not limit the number of exterior stairs. Please do not require large street-facing facades to be divided into smaller planes.
Once again, punish the homeowner and tell that person what the house can look like. Count stairs. Tell that person how many eaves and how big. Break up the front of the house into many small

<p>rooflines and shapes consistent with a city planner's vision of what a house looks like. Is the city going to live in the building? It goes without saying that the existing housing that doesn't resemble this requirement exemplifies poor building design, right? Developers desire to replace existing single-family detached housing with slab-sided prefab housing and charge twice as much, and this portion of the proposal goes far to redefine what a house is. City planners didn't write this proposal. Developers did. Portland isn't changing of its own accord. It's changing because City Hall is being paid by developers to change it. Corruption. Look it up in a dictionary.</p>
<p>Yes on limiting above-grade stairs. Point of those porches in decades past is an opportunity to see/converse/connect with neighbors next door and on the sidewalk. But the porches now are like traveling to the pearly gates. Also, consider mobility of future residents, and also short-term injuries etc. As Americans become more obese, we have more knee/hip/joint problems, and stairs can become impossible. If developers don't go for limiting the stairs (probable), can you have them put in an elevator? This could do a lot for accessibility and aging in place. No to projecting eaves into setbacks. Have you considered the gutter cleaning and other maintenance, and easements required to allow access? Yes to dividing large street-facing facades into smaller planes, esp if the bureau lacks power to diminish the size of those facades in the first place.</p>
<p>Require all walls to be divided into smaller planes. How inept and cheap are these architects? No more generic blueprint garbage.</p>
<p>Most definitely limit exterior stairs to one.</p>
<p>I think the eaves decision is good, given how much it rains, we need to encourage eaves. I, however, do not think we should be so prescriptive about the stairs. If a concern is accessibility, then incentives for ADA accessibility and visitability are more direct and effective. For example perhaps the first story is an accessible ADU and the second and a half story is the main unit requiring stairs.</p>
<p>I agree for the most part. I'm concerned about the large, street facing facades rule, however. There are some building styles that use this as a design feature. I can imagine the intent behind this rule but unless the intent is to exclude certain highly popular and often more modern design features, I don't think it's that simple.</p>
<p>This is kind of inconsequential. What is the goal here? If it is to get good or better design, this won't do it.</p>
<p>This looks great.</p>
<p>Yes</p>
<p>Are exterior stairs really that much of an issue in Portland?</p>
<p>I support these changes</p>
<p>The first one would make more basements which would be good. I agree with the second one. Maybe even 2.5 feet What is large?</p>
<p>no rip, as it is racist...p.o.c. are displaced to gresham and the region</p>
<p>I support bullets 1 and 2 and am neutral regarding 3, Require large, street-facing facades to be divided into smaller planes. For 3, my concern is that the rule would promote builders would throw random arrangements of materials and ornament on a facade to the meet the rule, making architecture worse than it would've been if left plain. Like buildings of old, a house can have a flat facade broken only by doors and windows (in a verticaly, proportional arrangement influenced by Beaux Arts) and still be beautiful and in no need to break up the plane. As one example I give the street view of 7100 Zimpel Street in New Orleans, LA .</p>
<p>I agree with the idea of limiting the number of exterior above-grade steps up to the main entrance. I disagree with the idea of allowing eaves to extend into setbacks. I want the City to continue enforcing current safety and building codes for fire prevention and historic tree preservation. I wholeheartedly</p>

agree with the idea of dividing large, street-facing facades into smaller planes. This will be much more pleasing to the eye, while allowing a greater degree of privacy for tenants.
This sounds like a good idea.
Leave design to the private market. Appreciate that no materials are designated in this proposal.
None of these 'improvements' are necessary, and eave projections (and bay windows, chimneys) are currently allowed. I am against any revisions
work with current neighborhood standards and make them fit into general standards that feel true to the place where they are being constructed.
Do not change our zoning
seems fine.
This is fine.
Beautiful is always better.
This should give new construction more texture, which should help.
Definitely yes to eaves. The other things sound fine.
If a property owner wants to do this, how do you determine that, e.g., 11 steps is okay but 12 steps isn't? Won't a builder jimmy the height of the risers to meet a stair limitation if it is close to a mandated number?
yes, yes,yes
Require that new building maintain architectural aesthetics of its neighborhood.
I am very supportive of minimizing above-grade outdoor stairs which tend to be a dominant presence on the face of a house and are often not even used by residents (if they can enter through a garage).
This allows for multiple dwelling units, and we already have problems with predatory building companies buying up lots, tearing down beautiful houses and putting multiple units on each one.
ok
I support these proposals.
Design is artistic and shouldn't be regulated by government.
this sounds good to me
The big houses with massive, steep stairs restrict living for those with mobility problems.
Limiting stairs may make some steeply pitch lots difficult to build upon. Again, look to current neighborhood practice.
i agree with all
Seems fine.
project needs a 6 month delay
Design should be open and flexible rather than constrained by regulations.
Support
Yes
Exterior, above grade stairs are fine. The US is becoming a poor country. We should allow less fancy kinds of stairs. Yes to eaves.
We need smaller homes that are affordable to people with urban jobs, not McMansions for Intel engineers.
Not necessary
Limit the height of the stair run, not the number of risers. Otherwise you will push people who have a lot of elevation to deal with toward designing stairs with a maximum riser height, rather than giving them an option to design a more gentle stair riser height.

Not so sure about the fascade division requirements, as most 1940's and early houses are effectively boxes.
Please encourage accessible entrances instead of assuming that everyone can climb stairs. Smaller planes are nice, but more active facades would be better.
No comment.
I am all for making housing more appealing. The city wants more affordable housing.. I believe the city has to take a hard look at it's impact on affordable housing. Permit fees are 45k, lot cost are 125k - 400k. With borrowing cost of 20k plus per loan... minimum before any dirt is moved, a developer has spent 200k. Then they must build the house, pay realtor commissions and pay closing cost. There's a lot of risk in building, a lot of time and money invested. A developer, for these risk, time and investment is entitled to a profit. So, you're looking at a starting price of a house of 450-500k on the cheapest of lots. Wouldn't it make a lot more sense to maximize each and every lot we have left. There has to be incentives for developers.. these proposals do not offer that. These proposals should incentive's ADU's, not limit them. The city has a tough job, I recognize this. I think the rezoning in the mid 1990's was brilliant and now it seems you want to limit these when you should be expanding these incentives. All areas near mass transit should be high density. With the limited supply of land, we have to build up. Do not cap or restrict land near mass transit. The citizens of our great city must realize there will have to be sacrifices and it should be well defined. Keep neighborhoods neighborhoods in areas away from mass transit. But near mass transit, this is where the density should and needs to be and citizens living in these areas need to be aware, these will be high density areas. Without addressing the above proposals individually... I will say generally regarding all proposals: do they make common sense, how much money will they add to the end product the consumer will eventually buy or rent, are they user friendly" for the developers. Any proposal that increases cost, suppresses development I would think goes against the goals of the city.
Agree
No, we don't live in a suburb HOA. People should be able to design what they want on their own property as long as life safety is not impacted
Limiting the number of exterior above-grade stairs is problematic since it will have the effect of encouraging taller risers. For example, 6 steps with code-maximum risers of 8" would allow a house to be 4 feet above grade, but 6 steps at a safer riser height of 6" would only allow a house to be 3 feet above grade. It makes more sense to limit the height of the floor to a certain height above grade (4 feet?) and allow more flexibility in the number of steps. The requirement to divide facades into areas of 500 sf seems arbitrary and would have a side effect of encouraging complexity for complexity's sake. This could lead to poor design.
I like all of these ideas. Above-grade stairs are not especially appealing, so these requirements seem reasonable. Allowing eaves to project into setbacks by 2 feet seems highly reasonable.
this is cosmetic and not a priority, particularly division into smaller planes
No
Odd that this is even necessary if size of house is limited. This shows the inconsistency in your proposals and again highlights the loopholes.
Why is this necessary if your proposed limit in size is limited. Proof that the size restriction is loophole that this proposal is even thought up.
Disagree on stairs . Agree on eaves Agree on facades
Restrict stairways leading into setbacks for skinny houses. Most of these already have a ground floor access and don't need a staircase extending out to the sidewalk. I disagree with limiting above grade steps into the front of a house. Most of the houses in my neighborhood are older and built someone

above grade. They all have anywhere from 6-10 steps leading to the front doors by design. Are you planning on making all of these nonconforming?
Only limit the number of above-grade stairs if there are no ground floor/basement accessible units for ADA applicability. Allow eaves to do whatever they want. I don't even understand the "smaller planes" recommendation.
Yes, it's all about human scale.
? lower heights of home no more mcmansions in older neighborhoods. someday soon their will not be first time homes that are affordable.

**5. Create a new Additional Housing Opportunity overlay zone – the new ‘a’ overlay zone.**

- **Allow the following housing types in the new ‘a’ overlay if one of the units is “visitable”:**
  - **House with two accessory dwelling units (ADUs), one attached and one detached**
  - **Duplex**
  - **Duplex with one detached ADU**
  - **Triplex on corner lots**
- **Require the following visitability features for one unit: a low- or no-step entry, wider halls and doors, and living space and bathroom on the ground floor.**
- **Allow an additional 0.15 FAR for triplexes on corner lots.**

ADUs fine, but duplex and triplexes (except internal conversions) should be strictly limited since they will alter the character of existing single-family neighborhoods.
NO. Do not do this. Neighborhoods are being destroyed all over Portland ruling the character of each neighborhood and livability but also creating a false narrative that it creates more affordable housing. NO.
This density is fine for other areas of Portland but ruins the character of the proposed area that is primarily single family dwellings. It is only a boon to developers. Some of the proposed rationale makes it quite clear that no one proposing the infill haa walked around the area. Infill destroys traffic patterns and certainly we do not have an urban vibe with shops and stuff to do in close proximity to dwellings. Not mandating parking spaces for the additional housing will be a logistical problem.
Yes. Please do this!
I think this new overlay zone is a good idea. Rather than require the vistability features, incentivize them by allowing additional FAR.
Allow additional FAR for affordable homes
A house with an ADU is more than enough. No duplexes in the residential neighborhoods. No triplexes on corner lots. Additional FAR for visitability.
I strongly disagree
Disagree. Onstreet parking is already an issue with individual house per lot. We live near Ainsworth school and next to some condos. We frequently cannot park next to our house. Adding multi dwellings per lot would be a nightmare for parking. In addition we are a neighborhood where our homes are generation homes.We are not a Pearl want-to-be alternative. Leave the neighborhoods alone. I have a rental in Laurelhurst where my daughter has raised her children where they could walk to school and play in their neighborhood. Duplex and Triplex units would disrupt a beautiful neighborhood where kids can ride there bikes and play outside. Again a street full of parked cars is

not a safe environment for kids. No person raised in one of these neighborhoods came up with this crazy idea. Think outside of some other box.
These proposals in principle sound fine & good, but we would prefer to scale all the numbers down (the FAR for the main house and the extra FARs for the extra units), so that yards and gardens are not sacrificed to housing density. We recognize the need for greater density and are willing to accommodate it in our neighborhood. The important thing to us is that it's done in a way that does not create a concrete jungle. As noted in our Q1 response, in our neighborhood (Multnomah Village), the problem is not duplexes and ADUs, it is that the City allows/encourages developers to demolish small affordable homes and build huge unaffordable ones. The City will win our support for increased density in direct proportion to the degree it restricts the size of new homes.
There are huge swaths of property on the map where the overlay is being removed. These properties are quite large and the opportunity for healthy infill is being reduced DRAMATICALLY. Just a quick view of this map also shows a distinct advantage for certain neighborhoods. Its interesting that the a overlay is being applied to historic neighborhoods where this type of infill probably wouldn't be allowed. The proposed changes only further exacerbate the disparities within the city's neighborhoods.
Even though I live in a severely single-family neighborhood (Irvington-Alameda historic district), I do feel we are missing the boat by currently discouraging duplexes (and maybe triplexes) in this area. We need additional housing, especially ones that can accommodate baby boomers as they downsize and wish to remain in the neighborhood as well as starter units for families.
I am against the level of infill allowable under this proposal. It would tremendously increase the number of units on a lot - irreparably changing the character of the inner eastside neighborhood.
In am seeing 3plus story houses on recent infill in my neighborhood. This has detracted from the livability and causes over crowding. The reason I purchased a bigger lot was for more privacy. My neighbors delveloped an unsightly 3.5 story row house into a single family lot. They also split the original house into two units. Now there are 4 families in the once single family lot. This has caused tension in the neighborhood and fostered a new project that completed across the street that is over 3 stories. Now the once stately neighborhood does not have a clear view of the park and has devalued our home value. It is to a point where most homeowners are selling to getting out before more infill detracts from home value. This is poor planning and will get worse if it keeps going unchecked.
This proposal guts this established neighborhood. Why not encourage multi-housing/more density in areas that are run-down or only apartments? What about the west side? The west side--Burlingame, Cedar Hills, Terwilliger for example--have huge lots with houses that don't maximize density opportunities. Or is this another example of exploiting the east side because it is more racially and economically diverse?
How does that affect my property?
Yes! I'm all for more housing and smaller options.
Generally support. Making the rules more permissive will allow markets to provide the density and affordability you seem to be after. Don't see why should have to make on "visitable" (let the market match supply and demand on that).
I appreciate and support the need for higher density but in our neighborhood, this needs to only be done if parking is required for newer/denser structures, as the hilly topography makes it too challenging to live here without a car, and there is very limited street parking
NO duplexes or triplexes; NO ADU
Once again I think it should be design based,what is the design of the neighborhood

<p>STRONGLY AGAINST Few if any owner's who occupy would favor this; it is for remote investors who want to tear down and otherwise increase density for profit at the expense of the neighborhood's livability and the desire of owners who actually live in the neighborhood</p>
<p>This should be allowed only in neighborhoods that are already as dense as the result of this proposal. Do not apply this standard to neighborhoods that are less dense than this.</p>
<p>Overlay sounds like crowding in structures.</p>
<p>I am deeply concerned and do not support this proposal. This is adding too much density in our older neighborhoods, which are already dense. Duplexes on corner lots fit within our residential areas. Triplexes on corner lots, duplexes on on standard R5 lots and additional ADUs, however, is going too far. I see this proposal as a threat to my neighborhood and creating worse conditions than the demolitions/new large infill.</p>
<p>Do not allow the addition of ADUs. Duplex or Triplexes. This is a residential area and it is meant for single family homes.</p>
<p>Limit to duplexes. No triplexes. They would be too large. ADUs on large lots would be okay.</p>
<p>I have a huge issue with this provision, and am adamantly opposed. This proposal could basically turn every inner east side neighborhood into an opportunity for development. Portland has done a poor job planning for growth, resulting in a decreased living standard, lack of affordable housing and increased homelessness. This overlay isn't an attempt to solve any of these issues (or continued growth), but instead a path for developers to further infiltrate our already dramatically altered inner east side neighborhoods. We have spent our entire history pushing out our lower income classes, to make way for growth and development. There has been little benefit to those that were supposed to see their living standard increase. I am frustrated by the lack of leadership in our city, and am deeply disappointed by the RIP proposal. This is a handout to developers, the highest bidders. Under the guise of urban development, economic prosperity, Portland is selling out to the hand of capitalism. The common voter, whom you are supposed to represent, loses.</p>
<p>I don't think this does anything to address affordable housing in already established neighborhoods. The overlay is in close-in Portland. Why? Why not in east or west Portland where homes are younger and already a hodge-podge with little community character? I bought my home close-in 20 years ago because I wanted to live in a neighborhood of historic craftsman bungalows. My neighborhood has diverse housing opportunities already. Small homes, large homes, apartments. This zone change will ensure that every small, more affordable bungalow in my Rose City Park neighborhood will be demolished as is currently happening. In its place will be either a larger home (doesn't do anything for increasing housing density) or more than one unit at a higher cost than the original home and disregarding the historic character of the neighborhood. Neighbors will continue to deal with the noise and debris of new construction and higher and higher property taxes. I truly fail to see how such an overlay in close-in established neighborhoods does anything except make contractors wealthy.</p>
<p>I support the new "a" overlay zone in all areas of the city as proposed in the current discussion draft. I don't think it's fair to exclude East Portland from the opportunity to increase their density so they may have the density/population to support amenity rich/walkable/20-minute neighborhoods like so many of the inner areas have currently.</p>
<p>Not happy with the city moving away from single family homes. With too much density comes more crime. No wonder people are moving out of Portland.</p>
<p>This is an exercise in social engineering. Rezoning most of the city will degrade neighborhoods, and will not create affordability</p>
<p>I DO support two units in the 'a' overly zone (i.e. a duplex or a primary/secondary dwelling). I do NOT support triplexes in the 'a' overlay district except in certain locations (i.e. corner lots or lots substantially larger than 5,000 feet in the R-5 district).</p>

Outrageous upramp of destruction of neighborhoods in inner N, SE and NE neighborhoods. Absolutely ridiculous giveaway to developers. No NO NO!
An overlay zone may be useful in neighborhoods that are not all single family residences. It is not appropriate otherwise.
Why does not just allow 2 ADUs on all houses and triplex on corner lot? Visitability seems overly complex.
Yes, allow more intensity of uses but don't necessarily tie to ADA access. Projects like these are often already difficult to finance and put together. Some sites aren't able to meet visitability requirements due to slopes/topography.
Disagree heartily.
This is all makes sense and I think it will drive creative solutions to increasing density, which is what we need.
I like the idea of allowing more to be built on adequately sized lots. However the visit ability features are over regulation and shouldn't be put into the code.
Why? What goal is this change trying to achieve?
Great. I appreciate the attention to accessibility here.
Yes! I study city planning but do not know what is meant by "visitability". I'm guessing it has to do with ADA?
Yes!
NO, I do not agree. Duplexes and Triplexes will not improve the quality of the neighborhood. ADU' s should only be approved if they have off street parking.
Sounds fair, but I think this will dramatically increase demolitions on corner lots.
This is great
Don't support triplexes on corner lots as proposed. Is it correct that a 50"x100' corner lot could be partitioned into two lots with one having a duplex and the corner lot with a triplex? If so, that is too drastic a change for existing R2.5 zoned areas. Especially over time when all four corners are converted from 4 single family homes to 20 dwellings. Turns every intersection into a small housing complex. No thanks!
No
Why the visitability features a requirement? Why extra barriers to housing. Offer incentives if there is a need for more of those, not limitations.
These all sound reasonable. Consider making the ADU SDC exemption permanent. How wide are the hallways? How can the No-Step work on sloping lots? One of the three units? or the third of three units? Seems restrictive. Maybe an incentive to have a visitable unit instead?
the listed housing types should be allowed by right in the new 'a' overlay with additional bonuses given for making one of the units "visitable" (i.e. additional FAR). as it's recommended now, the larger requirements associated with "visitable" units would prevent me from converting my garage into an ADU.
People adding internal ADUs should receive an exemption to the multiple-front-door restrictions for the visitable unit. The visitable units will likely be primarily basement units, and they should be accessible from as close to the public right-of-way as possible.
Priority for 'a' zone should be upheld, with current effects and practice evaluated: "The increase allows the area to absorb additional growth without creating market pressure that might lead to the early removal of existing sound housing. The increased density will lower the cost of housing while increasing opportunities for owner- occupied housing. Required design review of new development ensures that the new housing will make a positive contribution to the neighborhood's character."

Provide incentives for ADUs to be internal rather than detached or adding to building footprint. No triplex on corner lots. Again, increasing footprints and reducing open space on private lots will lead to fewer trees. Urban forest expansion on private property is vital to meeting Goal 2030 Objective 13 of the Climate Action Plan. Vacant land inventory is adequate to support housing needs based on population growth projections without rezoning and redeveloping existed developed lots in established neighborhoods.
I object to reducing zones in R5 to R 2.5 it will destroy the neighborhood, destroy green space, and promote destruction of older homes.
Why not just be honest and rezone it for apartments? Visitability is highly subjective and seems unenforceable and an opportunity for cronyism. People with friends at BDS will have units judged 'visitable'.
DISAGREE! There is too much housing crammed in the neighborhoods already!
Increase the FAR for triplexes.
This will allow more diverse housing options. Thank you.
Triplex housing should NOT be allowed on corner lots. Two houses, at the most, is all that should be permitted on corner lots
I'm strongly in favor of this, but why should "visitability" be limited to the ground floor? Cities like Montreal have cultivated beautiful and dense neighborhoods with extensive stacked mid-block duplex and four-plex housing types, something that is a common historic housing form in Portland as well.
Why aren't these provisions extended to R2 and other limited multifamily zones? As it is it is very difficult to build anything more than a duplex in R2 on the standard 50'x100' lot.
I favor limiting the overly to one ADU and one duplex with no ADUs. I do not favor a triplex on corner lots.
Why force any specific configuration of units? Would three (stacked) units on non-corner lots be so bad? Then houses could have some room for a small back yard. Bonus FAR is great. Let's have more, for instance, bonus FAR based on distance from higher intensity zones.
allow more units on site, so long as it fits allowed form... why limit number of units?
I support these changes.
no triplexes on R2.5 zones.
This looks like too much density, and too little open/green space. Infrastructure (police, schools...) seems lacking for the increased density proposed.
Very strongly agree! That's a great way to create affordable housing, make properties affordable to keep long term for the home owners and even allows them to create a good supplemental income by renting out the units. I LOVE the requirement to make one of the units "accessible" to all. Maybe there could be a tax credit for renting to people with disabilities.
I agree with allowing a house with ONE ADU; and allowing a duplex. I do not agree with allowing a triplex or a duplex with a detached ADU. I would like to see only two "units" per lot. I am concerned about developers tearing down houses so they can build up to three units per lot; tearing down our historic beautiful homes may be less likely if developers are limited to building two units per lot. The second bullet (visitability features required) seems like a good idea.
I support this.
I'm concerned that the new R2.5 zones are too concentrated. This will impact home owners in these new zones in a negative way.
it looks like this plan is neglects the lack of emergency services and I think it's irresponsible, even negligent, considering the safety issues we already face with the recent population increase.

NO. Too many houses being shoved into N NE, SE. This only works if parking spot for each unit is available. No parking, no ADU. We're decades away from carless (next iteration: EVs - still need parking!). Not all physically able to bike, etc.
I believe the "visitable" unit should be given an incentive, like a break on the permit fee but not be required.
ABSOLUTELY AGREE! Triplex on corner lots and ADU's with duplex locations is a great way to add units without large apartment building construction. We need to encourage more ADA and at least universal design for some units.
In the long game I believe converting existing single family properties to multi family will evolve into our neighborhoods being fragmented and eventually largely owned by the one percenters leaving working people few alternatives to perpetually renting.
NO! Part of the charm of our neighborhood is that it is quiet. Increasing the population threefold would destroy that charm. Please, no.
Please continue to keep SFR in R5 ZONES. Single ADU on a R lot acceptable.
Duplexes on corner lots are literally destroying neighborhoods. No one on our street speaks to the people who moved into the hideously oversized duplex "structure" that was built next to us. We collectively hate what they represent: the elite capitalist disregard for anything that resembles community. Triplexes?.....this literally made me burst into tears.
Please don't destroy existing buildings just to fit more units!! Inner SE could be a special tourist destination and model for other cities in how to maintain beautiful homes with their own patches of grass/gardens near a city center. Like Georgetown in DC.
I think you should allow MORE units per lot. I live in an old Victorian that contains four units. At a minimum this should be allowed throughout the overlay zone, with or without a corner lot. We need to add a ton more units in the type of areas that might receive this overlay.
You did not do a good job of defining or explaining what an "a" overlay zone is. Define "visitable." Why does a one unit require a low or no step entry? Is the city trying to engineer that all units be handicap accessible?
No 0.15 FAR for triplexes. That would be too populated and too many buildings for one property.
Again, we can ask when allowing these additional units. These units should not be used for ASTRs, because that does not achieve the goal of helping people access housing. There is a narrative that, with AirBnB, middle-class families can finally afford homes. This argument is bunk; housing prices have gone up dramatically with speculative interests and demand fanning the flames. My neighbors run a company called White Spider that is entirely dedicated to helping absentee landowners, many of whom work in lucrative jobs and have better access to capital than the average Portland home-seeker, make bank off of taking housing off the market and using it for what basically amounts to side-street hotels (the weeknight bachelor parties aren't fun for the neighbors either, I promise you). Portland needs to put a stop to that business on so many fronts, but we also need to be mindful that this commodification of any available housing space is a growing trend. Residential zones are supposed to provide housing. When we allow extra units, we can demand benefits in turn. This should really mean we require affordable units. At minimum though, they should have to provide HOUSING.
No additional FAR. Duplexes and triplexes should meet the same square footage requirements as single family homes. Same for ADUs.,no additional square footage.
Duplexes/triplexes use too much of available land.
Do not allow ADU's with a new 'a' overlay zone. It is bad planning.
Support - I harbor a great concern that Portland is losing its character as families, young people, creative are forced to leave due to lack of housing options.
This goes too far in destroying existing neighborhoods livability and aesthetic.

<p>I think all units should be visitable and limited to one story and thus be more affordable. Parking is a major issue in my neighborhood. More people per lot means more cars. It is unreasonable to assume people will forgo owning a car. Many streets have no sidewalks which means kids are walking to school at the edge of the road. Dog walkers and joggers are using the street and will have to be on the look out for more cars driving. Congestion on major roads like Terwilliger and Taylors Ferry is already difficult at commute times.</p>
<p>No triplex on corners. Duplexes have already made neighborhoods congested and crowded. Limit ADU to either one internal or one external. We are losing too many trees, open space, and gardens. Portland will pay a heavy price for converting to a municipality where residents have no opportunity to develop a relationship to the outdoors, no chance to grow anything, no outdoor space on their own lot to admire a sunset, toss a frisbee, play with a pet. We'll be a city of disconnected, disengaged, electronic device-addicted individuals, due to a complete lack of prioritizing livability and community in current development goals.</p>
<p>This sounds like an incentive to developers to build "visitable" housing types without an assessment of what and where the need is. There many ways of increasing the number of "visitable" units, including internal conversions, without tying it to density, unless the goal is actually density, not visitability.</p>
<p>Four units on one lot is too many. Only allow a total of 3 units with one of them contained within the main house (basement, etc.) and one additional free-standing unit.</p>
<p>Duplex and triplex should have size restrictions matching established neighborhood homes (no extra height). Only one ADU per house should be allowed. No to requiring the visitability features.</p>
<p>Absolutely! This smaller scale incremental development allows for better massing, individual property owners (who often are more vested in their neighborhoods) to add value to their property over time (vs. developers). I think in the long run this approach will add to a nice diversity of housing throughout our neighborhoods.</p>
<p>With due consideration for space for trees and green space. Affordable units should have green space too!</p>
<p>Uncertain, though, an interesting concept. However, in part, the reality of perpetual limited resources, raises serious concerns regarding the enforceability of "visitable" criteria. Therefore, unable to support-or, NO.</p>
<p>NO!!!!</p>
<p>ADU's expose home-owners to legal entanglements that must be addressed by city officials. ADU's should be operated at city expense.</p>
<p>ONLY in cases where existing homes are not demolished.</p>
<p>great</p>
<p>Great! Would love to see it apply to all residential zones citywide.</p>
<p>interior design should accommodate ada requirements and a low-or-no step is a good idea - however, ALL structures should reflect the tone of the neighborhood and lots should NOT be filled with additional dwellings. if there is ample room for ONE adu then it should be allowed. I absolutely guarantee that people will be using these adu's as air b'n'b rentals or other short-term uses and if there are too many on one street or on one lot, the character of the neighborhood will be ruined. this sort of smacks of socialism - folks who are fortunate enough to be able to afford large homes on large lots being encouraged to give up some of their privilege in order to help the less fortunate - a great idea in principle but destined to ruin neighborhoods in practice.</p>
<p>Agree in principle, important to have variety and balance of housing, BUT disagree with RIP being used to account for bulk of city planning. Reimagine instead population centers in innermost eastside industrial areas -- they have no business being in the heart of the city and instead should be</p>

<p>redeveloped as high-density mixed residential/commercial areas. Get polluting industries out while accomodating growth more centrally!</p>
<p>Allow for as many units as the FAR will accommodate - Again, DO NOT artificially limit the number of units - Allow additional FAR for each additional unit; building size will naturally be contained by height and setback limits - Provide similar bonuses for houses specifically designed to be shared (can attach a legally-binding year requirement, ala inclusionary zoning) - "Single-family zones" should dictate the look of the building, not the number of units or people living inside</p>
<p>No on increase FAR FOR TRIPLEXES you encouage triplexes which dont really fit period and stuff oversized buildings on corners compromising parking and traffic flow and completely ruining line of site down the street. Perfect for creating dark gaps for our rapidly growing criminal population</p>
<p>Limit number of ADUs on any block to 1 or two. mandate that any ADU be used for below market rate longterm rental. Prohibit any ADU from being listed on AirBnB.</p>
<p>Our neighborhoods are livable currently. You are talking about adding thousands of more people into a small area. Will parking be available. Street parking is already challenging. Will there be additional services such as police, fire personnel hired to deal with all these new dwellings and people?</p>
<p>East Portland should be included. We need to think to changes in the future so limiting the affordable housing this might generate should not be limited.</p>
<p>This amounts to a wholesale re-zoning of the entire east side of Portland, all done with minimal public information, and minimal opportunities for public comment. Very few of my fellow east side citizens are aware of this project, and fewer still are aware of the potential for radically changing our neighborhoods. To be clear, Portland is part of Metro, which already governs land use area wide. The urban growth boundary was not expanded at the last review, because no one is building in the current green field areas. All because developers make much more money redeveloping neighborhoods in the inner east side. In other words, Metro doesn't see the need to expand the UGB, because it isn't being fully developed yet, but the city of Portland seems to think that every new arrival needs to live inside of 82nd. No where in the RIP have I seen the issues of more public transportation or services that will be needed for the greater density be addressed.</p>
<p>The development of high intensity housing should not destroy mature, established, well functioning neighborhoods. These neighborhoods should have a voice (veto power) given the impact of these decisions. Such an intensity of building will have a significantly negative impact on storm water runoff. The requisite removal of large trees, shrubs and gardens will disrupt urban habitat for resident wildlife as well as migratory wildlife. The loss of large trees will harm our air quality with loss of CO2 binding and pollutant removal while further increasing the number of cars on the road.</p>
<p>I wonder if the visitability requirement will preclude projects that are otherwise good.</p>
<p>This all sounds like rental apartments in a residential neighborhood. These will tower over and overshadow the small houses in Rose City Park, forever changing the neighborhood.</p>
<p>Define "visitable" (by anyone, inspectors, other?). How will parking, traffic and other infrastructure issues be addressed by the addition of perhaps 8 additional people per lot? I oppose this.</p>
<p>This is a great idea.</p>
<p>Two ADUs is excessive for a house, the parking and transportation impacts will be unsustainable. What is the expected impact on neighborhood schools of the 'a' overlay zoning? Triplexes on corner lots will negatively impact neighborhood character.</p>
<p>triplex on every corner? Seriously? Thats really hard to understand the potential impact. How big can the overall structure be? I've heard several different answers that involve a lot of math. Does that also allow an ADU so in essence 4 units?? So confusing!</p>

3 units per lot seems pretty tight to me. Converting garages seems much more reasonable, and would conserve the feel of the neighborhood more. I hate the new taller houses squished in with almost no yard and no trees. What about our urban forest?
I can't understand any of this, but Eastmoreland should not have to have all its houses demolished so that two more expensive houses can be built on each lot. It does nothing except help developers. if you think you are helping middle class people by proposing this, you are being used.
Not sure if I like this one or not.
This is way too restrictive; allow more housing to be built please so more people can live in our city more affordably
you will be making Portland into one of the ugliest cities in the nation with this. You will be finding that old, excellent housing will be bought by developers and trashed to put in duplexes and triplexes, ADUs. It'll look like trash. This is a very poor way from the standpoint of beauty to increase density. In the future, Portland will look back on itself and judge from history that this was a short sighted, tragically ugly solution. There is no infra structure to handle this, no increase in schools, buses, all transportation modes. Where will everyone park? Why don't you look at the unused large parcels of land that are now emptying "town centers". Turn those into cities of housing with infrastructure built in well. Build up and up where you can, where there is that style--pearl, waterfront. Don't destroy neighborhoods, and the green space that goes with having a yard. In the end, Portland will be sorry--we'll be drowning in the extra rain from climate change, and we'll have cut down trees and ripped out the hedges that would have helped absorb that water---all to put in people in (still) low density (and now very ugly) housing.
No to two ADU's and no to triplexes, that is too much for one lot.
One entry door and bathroom on ground floor - YES
No
Visitability feature and corner lot triplex FAR bonus are especially valuable plan features.
Keep zoning as it currently stand!
While this may make sense in some parts of the City that qualify for being within 1/4 mile of a "center" or a corridor with 15-minute bus services, my neighborhood of South Burlingame is woefully under served when it comes to streets (narrow, many unplaved), sidewalks (most streets do not have them) and storm drains (where they exist, the dump into the right of way). The additional population would be a huge burden on the substandard city streets, sidewalks and storm system. This is very bad idea for this neighborhood.
Love this!
Awesome
tris and did again must fit the character and total square footage can't be more than twice that of homes next to corner lot
Why not include 4-plexes as well, say a 2-story 4-plex.
From places I've lived before, I'd say duplexes have a lowered negative impact than three units on a lot. Do not like the three unit idea. Requiring "visitability" is one way to assure these types of units are built. I just don't think the tradeoff of three units on a lot is a good one.
It would be extremely helpful for adding housing density by allowing people to have two ADUs. All of these suggestions would increase housing and look much nicer than one enormous house on a lot.
Visitability a good idea, please clarify that wider doors applies to bathroom on main floor.
House with two ADUs One attached and one detached
I'm am 100% in favor of this increase in density.

<p>Why is this written in complex jargon only City planners can understand? This seems like it's done to make sure you can push through your agenda. What are the implications of this? What does it mean in real life? How will it change the face and character of our neighborhood? Why did you designate only the areas with the cheapest and smallest homes? Why not encourage knocking down the giant homes on the ridge and replacing those with 4-plexes?</p>
<p>'Visitable' is a confusing concept for me. I have a property on a corner lot and would like to put in a basement ADU and a garage ADU (detached but with shared roof). I feel like it would preserve the character of the neighborhood (Kenton) and add much needed quality housing to this city. Why there is any pushback from anyone is a total mystery to me. If the answer is parking I am speechless because parking is not even close to capacity in our neighborhood and there are people scraping by because of a lack of housing. A neighbors right to park easily ranks pretty low on what I see as a societal priority list. Frankly they seem spoiled and entitled.</p>
<p>Better. Look at examples from the 30's and 40's to guide proper proportion, setback and planning.</p>
<p>Depends on how close to the lot line these can be, and how tall. Something that's one story and does not peer into the neighbor's yard is fine; a two-story with windows right on the neighbor's yard is not okay. Residential neighbors do not expect the same lack of privacy as those living downtown. I like the idea of making ADUs accessible, but that's a different issue from privacy expectations.</p>
<p>Very concerned with setbacks from property line in cases where new construction is next to existing buildings</p>
<p>I think you really need to clarify the difference between a duplex and 2 attached townhouses. A duplex means something that is rental property and the townhouses mean fee simple separate ownership. Will the new size limitations apply to attached townhouses? I think they should. There are 3000 sf townhouses being sold for \$1,000,000 in NE Portland (each side) that are increasing property values.</p>
<p>I completely disagree with this change for historic neighborhoods. This level of density is appropriate in places like the Pearl District or Industrial Eastside but not in Portland's neighborhoods. The aggressive advocacy of this approach is being pushed without appropriate public comment and objection by our neighborhoods. I believe this agenda by the city council is pushing aside the perspective of people in neighborhoods that are affected by these changes.</p>
<p>This is horrifying to me. If you are adding ADUs all over the place, where are these people going to park? There is already a parking problem in this area with all the students living 4-5 in a house with parking for 0-2 cars. There is very little curb space. When you add in skinny houses they break up the street with driveways leaving no room to park. This will only make it worse. It also cuts down on green space and privacy. There would be less land to absorb the rain, and so more flooding issues. There would be more people in less space, so less privacy, more conflict, lower quality of life. I think this would drive people to live elsewhere. And once you cram all this in, it's not like you can later realize your mistake and take it out. This fundamentally changes the quality of life in Portland at the expense of the residents who are already here. New houses are already often incorporating ADUs as part of the design of the house in this area. We don't need a bunch of "sheds" in everyone's yard full of people.</p>
<p>Triplexes on corner lots is a terrible plan. My street, as an example, only has two homes and therefore both lots are corners and triplexes on each would make for a VERY crowded street, especially when all the other streets are still single family. Triplexes would be grossly out of neighborhood character. Many neighborhoods in SW Portland, are not suited for this type of congestion.</p>
<p>Neighborhoods are already congested. I am not a fan of ADUs. In my neighborhood we already deal with pets not well-tended, noise and litter. I don't think cramming more people into small spaces will</p>

do the neighborhood or city any good. The city can expect more complaints. Citizens can expect the city to say that they don't have the resources to respond to complaints.
I think you should allow these housing types in every single family neighborhood, not just in an overlay, and not just if they are "visitable." I appreciate the need to increase visitable housing, but don't use it as a possible barrier to achieving the overall desired goal of smaller housing options, and more housing, in these neighborhoods. Find another way to incentivize visitability. You are pitting two good things against one another.
Makes sense but are there requirements about how big the lot has to be? It worries me that if every lot gets packed with living space there will be no green or outside spaces.
Allow houses with two ADUs, of which both can be attached or internal (basement or attic).
NO! Please reconsider this. So many neighborhoods are already overcrowded and have no parking. We need more infrastructure such as wider streets to allow for bicyclists, sidewalks on busy roads so those residents already living in the neighborhood have a safe way to walk places. For example, walking on SW Vermont west of SW 45th is so scary. As is walking on SW 45th south of Vermont. We need infrastructure before you infill every nook and cranny.
No duplexes if currently not allowed by zoning. Why isn't close in SW & NW hills included in a overlay zone. Seems quite arbitrary why close in SE has so much overlay as compared to West side. Smacks of elitism.
I support these changes.
I agree with this concept. My only comment would be that since a house with a duplex 500' from transit requires one parking space, then a triplex on a corner should also only require one parking space.
I like this update and believe that it's good for both Portland residents and long-term population density within Portland.
This will encourage more demolitions and therefore more construction of poorly designed new structures because of lack of adequate design controls.
Your 'a' overlay is too far-reaching. I'm completely against the map I saw that includes pretty much all of Southeast and Northeast neighborhoods. Goodbye to older housing, especially modestly-priced houses. Developers will LOVE your plan. Tear down existing houses, build 2 to 3 houses in their place, and then stick ADUs on top of them. Goodbye historic neighborhoods. Bye bye to the residents in them. I oppose the overreaching of this overlay zone. I would never vote for anyone who would vote for this plan. You will lose my support altogether. I hate it.
Please, this is a developers dream to buy lots in desirable neighborhoods subdivide the lots and sell for an ugly profit, driving up taxes and property values in those affected areas, and making those houses less affordable to working class families.
Yes. I support this change. We need to be promoting more dense urban housing.
Refer to Visitable - as defined by FHA Design Manual including an accessible route within unit. Bathroom may be only a powder with WC and Lav. Language of 'wider halls and doors', low step entry is arbitrary - residential code allows 3'-0" min clearance for hallways. Agree that additional building area is needed for viable units, however, the increase in FAR has significant impacts on adjacent properties. Increased lot coverage significantly impacts the house next door as buildings press the setback lines; exterior walls are large blank expanses or have windows, reliant upon light and air from the adjacent property. Recommend if height taller than adjacent properties, then side and rear yard setbacks wider to relieve pressing against neighboring properties. FAR is used more commonly with commercial buildings. Lot coverage as % of lot area with setbacks and building heights is typical parameters. Recommend when additional FAR provided, then require additional outdoor space. Require space on site and within the building setback lines specifically allocated to

<p>outdoor storage, waste collection, bicycle and vehicle parking. Include language to locate waste collection facilities out of the sightlines of the street and within a screened enclosure. Along with density - city nuisance regulations for noise in neighborhoods to be addressed in an enforceable manner. Current noise violations do not adequately address unwanted noise generated by neighbors with outdoor activities ie. patio sound systems, early morning carpool groups.</p>
<p>Again, I don't understand what is meant by FAR Seems to set up single family zones as small commercial areas, as this proposal will lead to more AirBnB businesses.</p>
<p>If R2.5 zones are not currently seeing massive redevelopment to create the above housing types, and R5 zones are already seeing some (but not all) people take advantage of ADU and corner duplex provisions, why is this housing opportunity zone needed? If the market was screaming for this type of housing, wouldn't we see more activity in the R2 and R2.5 zones?</p>
<p>we should allow 4-plexes on corner lots and triplexes on every property. Who cares how many units are on a property? We shouldn't be mandating unit counts but rather mandating safe construction.</p>
<p>Disagree to all. Houses should be able to have one ADU but no more than that. Please see aforementioned comments as to why.</p>
<p>Bad idea. To many unintended consequences</p>
<p>Allowing for single person housing will change the essence of the neighborhood that consists of single family homes, many with young children. Increased traffic and safety will also be a concern.</p>
<p>Your design options will ruin the look of the neighborhoods!</p>
<p>Do not increase density in single family zones. And label the zones to truthfully indicate what is allowed.</p>
<p>Like the visitable clause. Like the increased FAR.</p>
<p>This overlay zone is nothing more than a giveaway to developers and incentivizes the demolition of our neighborhoods. We've seen this on corners where a perfectly adequate \$500k or more home is replaced with a duplex where each unit goes for \$800k or more. This increases density, but does not improve affordability. I can find no information on what is deemed "affordable to those making 80% of Portland's median income." Who will determine what this number is and who will enforce it? And why is most of the west side not subjected to this overlay? How is this equitable?</p>
<p>Our neighborhood is already so dense with 4 houses around my backyard! Adding more people lowers our quality of life as it increases noise and privacy. These changes make us want to move out of Portland, not stay.</p>
<p>- and add a key to the zoning "map app" so people visiting it can tell what they are looking at.</p>
<p>No need to change, ADA deals with these matters</p>
<p>No. Absolutely not. You are going to destroy the character of all our Portland neighborhoods.</p>
<p>This is too much density negatively impacting neighborhoods. Little to no parking or services to support the change.</p>
<p>I think it's important for some kind of infill to allow more homes on certain lots, so something like this is necessary. My one worry would be that this rule would increase demolitions of existing houses in order for developers to make money by building duplexes and triplexes (see next comment).</p>
<p>disagree. This will not advance affordability one bit. This is a handout to developers to ignore neighborhood character. Also this question mixes too many varied proposals into one.</p>
<p>I'm AGAINST this massive re-zoning for duplexes and triplexes in single family house zones! It would be much better to do a pilot project in areas where residents support. I would be ok with most of RIP if demolitions were strongly penalized. I have a 100 year old house. I want to subdivide it, but I don't want it demolished!!!! RIP will turn Portland into an enormous demolition zone. Since the most affordable house is the one already built. This will demolish our most affordable housing. Saving our</p>

current housing stock prevents huge dislocations for people of color and low income people. If you don't restrict demolitions, you are contributing to terrible inequity. I say NO TO DEMOLITIONS!
I understand the intention to accommodate ADA/universal design for accessibility but in doing so you're limiting the ability to have a basement level dwelling unless it's completely submerged below grade. Since the bigger goal is to increase density all (new) units on the property should be given the same design considerations of livability (access to daylight, outside, etc)
I support
yes to the overlay - hopefully the overlay zone is geographically broad. while i am an advocate for accessibility...i am not sure it should be a requirement..maybe incentivized somehow instead? fine on the additional FAR i suppose.
As a tenant, I support this overlay and would like to is increase to 1.0 FAR for all residential zoned areas in order to better reflect the character of residential areas (with many non-conforming plexes and small apartment buildings). I also demand that city to live up to its committments to improve housing equity and affordability by creating voluntary density incentives for the creation of additional affordable housing units in residential zones.
As an architectural designer, it's important to keep the needs of those with mobility issues in mind. That said, this is going to be a huge tradeoff with other neighborhood qualities that Portland has said is important, namely the elimination of much-loved porches and front stoops. Additionally, this "a" overlay you propose is much weaker than the current a overlay, which allows up to 1.5 times of the number of units per lot. A .15 addition to FAR is not going to give you the desired outcome. It's not going to be worth it to builders and architects to worsen the curb appeal of a house for the ability to add 750 square feet of expensive square footage. It's diminishing returns. Fewer bathrooms and kitchens = much less expensive to build, and if a project is going to be more expensive with less curb appeal, it probably won't get built. If Portland really wanted to encourage certain building types, it would allow a much more meaningful increase in FAR.
I oppose this. The proposed "overlay" covers most of the residential area of the city - that is not the purpose of an overlay; it is a rezoning. Second, it is an inefficient way to produce more housing that produces vastly more impervious surfaces and removal of green space. Parking isn't addressed. Produces overly small units for families. Produces the possibility of a large number of small condominiums which have proven to be very problematic in other cities.
Overbuilding on lots is a very real problem, despite the loud voices pushing for more density in ever nook and cranny.
So narrow monsters can be called ADUs?
In addition to those noted, please allow additional housing choices in the overlay areas, including fourplexes, courtyard apartments, and townhouses. Please waive parking requirements for all housing types. Yes--I support the visitability features requirement. Please allow additional FAR for all housing types on all lots. More housing choices, waived parking requirements, and additional FAR help support Portland's goals for housing affordability, safe transportation choices, and climate change mitigation.
We do not support allowing for detached accessory dwelling units as an 'a' overlay unless strict setback limits are established so that the detached unit is nearer to the main house than the property line.
Please consider Portland Heights for a change. Largest lots available in the city. Triplexes here, yes. Not in the old Eastside neighborhoods. Developers live where?
No duplexes or tri-plexes on existing single family lots!
duplexes and/or triplexes in a neighborhood that currently consists of single family dwellings will change the character of the neighborhood in a way that will not improve it.

no
Let's not encourage multiplexes throughout Portland corner lots; it will bring with it wasteful demolitions for profit seekers.
no overlays..the traffic is bad enough, litter is everywhere, and our infrastructure is bleeding...we don't need to be a big city...stop the madness
5. While I can recognize the benefit of wider halls and doors for a limited number of people, I would hate to see them proliferate—just like I don't want to see wider parking spaces proliferate. More people have a hearing loss disability than those needing wheel chairs, so why not give incentive for houses that are acoustically treated for hearing loss? Although I'm not opposed, a no-step entry seems like it could lead to multiple other problems--from lack of privacy to greater susceptibility to flooding . I do think triplexes and fourplexes should be allowed in any Additional Housing Opportunity area, WHETHER OR NOT VISITABLE.
I am opposed to Additional Housing Opportunity (duplex, triplex, etc.) in any single-family neighborhood.
Disagree with mandating this in all neighborhoods
disagree with triplex on corner lots and disagree with allowing duplex with attached add
I would prefer to limit ADUs to one per house, and none for a duplex. All conditioned on not removing mature trees. Replacement housing types should not cost significantly more than the houses they have replaced.
This is unacceptable.
Sounds like over fill of corner lots.
No "a" overlay zone. Just another scheme to junkify this city.
One ADU is OK, but any more density than that will degrade the quality of our historic neighborhoods beyond repair. If the developers want to pack people in like sardines, then find large empty lots to build more apartment buildings. Leave our charming old neighborhoods alone!!!!!!!!!!!!
No triplexes or duplexes in established neighborhoods.
Disagree in regards to housing type changes in new overlay zone. The new overlay zone is quite large and would be significant. It has the potential of permanently changing the character of some of Portland's oldest neighborhoods. The "a" overlay should be reduced in scope and focused closer to the city center. Agree with second major bullet and disagree with third major bullet.
Fewer ADUs.... maximum number of 3 per block, mandate that ADUs be rented below average rent, prevent ADUs from being rented via AirBnB.
NO, NO, NO! Again, we do not want three houses on a lot that was originally designed for one house in a single family neighborhood.
Not in well established and possible historic neighbor hood like Eastmoreland with no existing duplexes or triplexes
Horrible plan--it will destroy residential neighborhoods in Portland, eliminate our gardens, peace, and solar access. Where will all the children in these new infilled houses go to school?
No triplexes should be allowed in any established historical neighborhoods. You are in too much of a hurry to destroy the history of Portland. In the future this overcrowding will be seen as a terrible mistake. The more homes you allow to be torn down and replaced with artless, faceless human storage boxes the more you destroy the very reason that people love portland and their neighborhoods.
No! Absolutely not! This is purely a density-at-all-costs move. What smooth operator thought this one up?
No, no, no. NO overlay. I view this as an assault on the established neighborhoods of the east side.

No new duplexes! Duplexes means demolition of thousands of existing houses. Instead, add ADUs and use internal conversion of existing house to duplex. No triplexes!
5. Pathetic. This is actually less denser than the current 'a' overlay. Did you not get the memo, or the city council resolution, about the housing emergency? If this is the best you can come up with, you should seriously resign and go work for Omaha, or maybe Kansas City. We need more housing. We need a form based code. Four-plexes should be legal by right in all single family zones.
More of this. But why a special "overlay zone"? Make this permitted in every residential zone.
The overlay zone is an okay idea, but it has been applied onto the map in a timid and ineffectual manner. If there is an FAR cap, why bother regulating the number of units? ---particularly if the FAR and height limits and height calculation conventions are so constrained. If housing is a big issue, why proffer such a stunted approach?
Don't make it harder to build housing with extra visitability features . . . and again, make it easier to build adu's/duplexes/triplexes on corner lots -- more housing=more affordable, and also = increased density which in the long run (unlike sprawl) requires less energy use (ie New York City) per capita -- thus environmentally friendly
I'm strongly in favor of this.
Two improvements here, the first for GHG reduction and the second to ensure meaningful accessibility: 1) Make all dwelling units attached 2) follow the Universal Design standard. You are giving a bonus here--make it count for those most in need!
I support all of the proposed changes described above.
If you're going to require accessibility, you should add more FAR bonuses, since accessibility takes up usable space in small units.
What problems are you addressing?
NO! TOO MUCH DENSITY! Stop ruining Portland for the benefit of outsiders and developers.
Fantastic! I love this!
To allow duplexes is to encourage tear downs. I've seen ADU remove all backyards of the host house ruining the resale value and privacy of all 3 neighbors. I live in fear of my backyard being overwhelmed with a house or 2 looming over my yard. Plus this doubles traffic on roads that aren't maintained- potholes from last winter! Trying to mandate features of the houses without going as far as mandatory ADA rules is ridiculous. I just hope that passes so that less developers will ruin my neighborhood with these duplexes.
More of the above housing is needed. Missing middle housing should and must constitute the majority of new construction throughout ALL of Portland in the coming years, that means BEYOND the West Hills, on Hayden Island, beyond I-205 to the east and beyond Division to the south. WE NEED MORE MISSING MIDDLE HOUSING IN EVERY SINGLE ZIP CODE IN METRO
Still too restrictive to get the inner city density we desperately need.
Excellent way to improve the supply of accessible units.
Great!
requiring visitability features will make basement or over-garage units non-workable. This will reduce the incentive to adapt existing housing in favor of demolition.
What about courtyard apartments? They are all over our neighborhoods, are pretty, and provide affordable housing. Cottage clusters are great!, but they are also a more expensive housing type than basic garden apartments.
Absolutely disagree. This has the potential to completely destroy Portland's attractive neighborhoods that drew most residents here initially. Portland does not need to accommodate every person who potentially wants to move here-there are other viable cities on the west coast as well. Inasmuch as

<p>Portland should increase population in preexisting neighborhoods it should be done by encouraging development of current structures to facilitate population growth-ie. conversion of basements and garages to ADUs, addition of ADUs in existing spaces. Tearing down homes to make way for expensive triplexes does not facilitate the type of growth that is being sought-this policy is in the best interests of developers, not the city!</p>
<p>As a home owner NE PDX, I have three families living in my home. My mother in the main floor, myself in the basement walk out and my brother in the garage turned into a bedroom. Because of regulations I can't make a legal duplex in my home but with this regulation change it will be a legal duplex. I don't expect my family to move out but I would like it a legal duplex to help my obtain financing and make my property a duplex in a R5h zone. I'm located in the middle of th street.</p>
<p>ok with this</p>
<p>I'd push back on limiting the R.I.P. to just the overlay zones rather than city-wide. Housing pressure relief methods need to address housing needs at all levels of income. In theory the result of the R.I.P. will be more accessible housing. This is needed everywhere.</p>
<p>Before proceeding with the RIP, analysis must be done of potential impacts from these changes: housing prices, rental costs, sewer infrastructure, number and distributions of demolitions, displacement of long time residents, % of current viable houses, and more.</p>
<p>As long as measures are taken to do everything possible to preserve existing residential structures, then allowing a home to have 2 ADU's- one internal and one external is fine. Same with allowing for internal conversions to create duplexes or triplexes. Without sound protections for existing housing built into this provision, this essentially up zones the entire overlay, and up zoning increases land value, but not structure value. Increased land values result in more demolitions of sound, affordable structures to be replaced with expensive units. So as long this provision only applies to existing homes being retained, then this will hopefully increase density in an organic way. If the result of this overlay is increased demolitions, then it's like unleashing a trojan horse.</p>
<p>I am opposed to an "a" zone.</p>
<p>Apply the same rules to all residential areas of the city, except for vulnerable communities</p>
<p>I do support allowing duplexes and triplexes to be built. I think that's a very reasonable solution to the housing situation in Portland. This would allow a family home, but on a denser scale.</p>
<p>Yes.</p>
<p>I fully support duplexes and triplexes, but not the need to make them "visitible".</p>
<p>The additional FAR should be greater. The square footage allowed for multifamily housing should be at least 25% higher than that allowed for single family.</p>
<p>NO to triplexes on corner lots.</p>
<p>OK</p>
<ul style="list-style-type: none"> <li>• Adding smaller houses to lots that already have average-sized houses will bring down the property value of the neighborhood.</li> <li>• Adding housing without requiring adequate additional off-street parking to areas that already have narrow, poorly maintained streets that lack sidewalks will increase the risk of human-automobile interactions.</li> <li>• A more sensible approach would be to limit the number of multifamily dwellings per some area of land, for example, no more than 2 or 3 duplexes per block of single-family dwellings, and no more than 1 triplex per block of single-family dwellings.</li> </ul>
<p>We need middle housing so badly!</p>
<p>I like the general intent of increasing density, but I worry that by allowing it only in certain areas, a lot of development pressure will come only to those areas thereby increasing displacement and values, working against the stated goals. I think it would be better to allow more density everywhere while strengthening disincentives to demolition by allowing more flexibility when existing homes and trees</p>

are retained while providing more units. This must be coupled with in-depth analysis to avoid displacement of vulnerable populations. Visitable unit design is a great idea, and should be expanded to require FHA compliance similar to ground floor apartments. It is advisable to encourage and/or required the use of an architect for the most complex arrangements where multiple dwelling units are being placed on a site.
Allow more FAR for duplex and triplex, drop the "visitable" rules
NO triplexes on corner lots!
Sounds good, but please remove the visitability requirements.
Overlay zones are a sneaky way for developers to sidestep existing property boundaries and rezone lots when the existing property lines don't suit them. It is not a housing opportunity but a way to force density in existing neighborhoods. As a property owner I resent the City changing the rules of the game to benefit developers who want to destroy existing homes and neighborhoods at the expense of the rightful property owners. My corner lot is highly desired by developers who would love to build a triplex here. The recent sewer work on the East Side was not routine maintenance but an expansion in order to handle increased density. No accident that the contractors were all from Salem. Your overlay zone will do nothing to improve livability and do everything to foster demolitions and new construction. It is obvious that City Hall only cares about developer money and people moving here from other cities where this homogenous process has already been completed. New arrivals don't care because they won't realize what has already been lost--historic single-family detached neighborhoods of high quality and livability, traded for cookie-cutter substandard modern construction and ADUs.
Visitability is not ADA—be brave and do the right thing, instead of giving lip service and then not the goods. So let's see... triplexes everywhere, quadros on corners? Making R5 even denser than R1? Why must we undo all the zoning that's been in place for decades just because everyone suddenly wants to live in a shiny new manse/condo/apartment. The best cities are confident about who they are and hold on to what makes them unique. BTW, have you seen the glut of apartments lately? I had to reduce rent on my 550 sf house that I saved from a bulldozer twice. With more units coming online, this seems like a solution in search of a problem. May I remind you of what you heard at the Roseway meeting: "What problem are you trying to solve?"
No additional FAR and no more duplexes. Actual houses should be more affordable. More basements/Subterranean living space!
Allowing multiple houses on existing lots is ridiculous. Narrow streets without sidewalks are already challenging. Where will all these people park? Street parking doesn't exist.
NO overlay, zones! I bought in to and pay taxes according to existing zones.
Great!
I think this is great. My only concern is the small FAR allowance for smaller lots. I think the FAR addition for detached ADUs on smaller lots should be scaled to 0.20 or 0.25 FAR.
Good.
Leave existing rules in place.
The visitability condition makes sense for new construction but not for existing houses. Do not allow triplexes on corner lots - it's too much. We need to preserve our neighborhoods and old houses.
NO
The new housing types should be allowed in all neighborhoods, not just in a housing overlay zone. The overlay denies most of east portland access to more duplexes, triplexes, and ADUs.
Would prefer 4 unit cottage developments on corners and three ADUs. Again, the crisis is land price and the more build is done, the more availability we'll have for all levels of the housing market.

This is great but should be extended to all of Portland. Increased complexity just makes the barrier to entry higher for small developers. Requiring no step entry will also increase barrier to entry. Many old Portland houses could have a basement and over the garage unit, but the visit-ability requirement will limit the options and thus limit the homeowners who build extra units.
Housing opportunity zone should be citywide
I support these changes ADDITION: Have this 'a' overlay zone apply to R7, R5 and R2.5 property created from R10 and larger properties that are the result of land divisions in areas where the 'a' overlay applies to these zoning designations.
Do not create this zone. We do not need any more density of housing in the neighborhoods. We have the 2035 plan that puts the density in and around the city centers. Let us keep that until the centers get developed.
The amount of housing units allowed will have a profound impact on our neighborhoods. Homeowner's existing ability to build ADUs is already increasing housing supply. Let that opportunity play out and see if we like the changes. The Planning Bureau is proposing too much too fast. Portland's neighborhoods draw people to this area. We should proceed in changing those neighborhoods cautiously.
see comment #9
no overlay..no rip..no upzoning....
Why would anyone want to be a landlord in Portland? In an R2.5 property with 2 ADU's, the homeowner would have to pay tenants to vacate their primary residence.
Yes
I support Item 5.
I do not support more than one ADU per 50 x 100 lot. I do not support a duplex plus one detached ADU. I do not support triplexes on corner lots. Also, I do NOT support "tiny homes," or ADUs less than 500 square feet in size. Anything less than 500 square feet is a short-term transition home and is not livable for more than one person for any prolonged length of time. Ultimately, there will be a tremendous waste of resources--monetary and building materials-- if ADUs are not solidly built with enough space, sturdiness, and good-enough design to hold up over time.
Do not create the new housing opportunity overlay zone. These dwelling units can be incorporated into the city centers.
The lots in North Portland are to small already, and property taxes are outrageous. There is not enough parking as it is, and the roads are not reliably maintained. This would exacerbate the existing problems.
Great idea! Will help with ADA housing and affordability.
I am against the Additional Housing Opportunity overlay zone. Any zoning change should be within each individual zone; overlay zones are redundant, they violate the history and process of previous planning laws and the zones. The AHO scope is too broad and insensitive to our city planning history, local developments, geographic opportunities and issues.
I cannot comment on this as I am not sure how much of an issue this is--some homes but not all will have to comply with this as not everyone requires special considerations, so not all houses should be required to provide them. If it is an issue, buy a ranch, which we should build more of.
Good idea
Do not change our zoning
Opposed. Keep single-family neighborhoods as they are.
Agree this is a good way to increase density in single family neighborhoods
No, this is too much. It's like creating mini cities.

<p>This part is key to the plan for increasing middle housing. I support all of the above. Many other forward thinking cities in North America are doing this; so should we.</p>
<p>I love the increased density which I think will be accomplished in very manageable ways. Also fine with additional FAR for triplexes on corners. Sounds great. Visitability is a noble goal. Is there an "out" if it proves challenging? Or would you have to go through an adjustment review?</p>
<p>I am opposed to the blanket overlay as it disrupts any expectation of neighborhood consistency of style. insufficient parking will further disrupt neighborhood character and decrease safety.</p>
<p>N/A</p>
<p>I am supportive of ADUs generally, but the 'a' overlay zone area seems somewhat arbitrary. It would help if the criteria were more obvious and the rationale more clear in public materials.</p>
<p>This again allows predatory developers to push for multiple residences on a small plot, changing the character of neighborhoods and leaving no space for community</p>
<p>These housing types should be allowed in ALL neighborhoods. Limiting these to certain areas will likely further displace people due to increased development pressure.</p>
<p>extend A overlay to the whole City in increments or phases, each 5 years apart so as to reduce gentrification and equity discrimination caused by the RIP</p>
<p>NO! Maintain and create more OPEN space as population grows. Build in outer SE, and other areas that have undeveloped land, and room to grow. DO NOT BURDEN EXISTING CLOSE-IN NEIGHBORHOODS WITH THE WEIGHT OF THIS GROWTH. Help other areas grow and improve public transportation.</p>
<p>I support these proposals.</p>
<p>Please, stop pushing the density. Perfectly good houses are being demolished all to push in more housing. People do not have to come here to live you know! This is not about NIMBY just a reasonable concern for what makes Portland great.</p>
<p>Build More - Allow More - Density -- UGB</p>
<p>The Real Choice Initiative is committed to reducing inequity in access to housing in Multnomah County by advocating for expanded housing opportunities for people with disabilities. As Portland's city center grows taller and other parts grow denser through the construction of ADUs, the City must realize its vision of inclusivity set forth in the Portland Plan and continuing into the Comprehensive Plan. We are encouraged by visitability standards that are part of the Residential Infill Project. Visitability encourages community inclusion of people with disabilities by mandating that we, too, have a way into friends' homes and a bathroom to use. The last point is a matter of dignity. Still, we have concerns that the Residential Infill Project is a means to resolve the housing crisis, yet it insufficiently addresses the need for units where people with disabilities can live sustainably. Creating places where people can visit but cannot live comfortably does not meet the housing needs of the disability community. The increased density proposed is a good incentive for the creation of more housing units that meet visitability requirements. Visitability alone, however, is a minimal requirement for creating accessible communities. To us, creating "housing opportunities" .by way of the Residential Infill Project necessitates access to all amenities a housing unit provides and concerted action to ensure accessible units are in fact built.. We respectfully request that the City track the construction of accessible housing, verify accessibility standards are met, and include these units in efforts to support the disability community to find suitable housing (i.e., an accessible housing inventory). At minimum, a housing program promoted by the City should meet Universal Federal Accessibility Standards in terms of the percentage of accessible units created.</p>
<p>This is a problem in that you are creating too many units in places that are designed for only one unit. Too many cars, too many people in the older neighborhoods. There isn't space of this. Besides not everyone wants to live in a duplex or triplex, some people want to have a regular single family home.</p>

Do not do this! Do not rezone R5 to R2.5. Do not allow so many units on lots. There will be no parking, no trees, no solar, no place to grow food, encourage birds, bees, do not make this mistake!
Too many units on typical lots - no. And are these required in well-off areas?
i disagree with all of these points. it is the reason why many great neighborhoods have shoddy apartment complexes built on their perimeters in the past. it will not solve the housing affordability crisis, it will just allow the developers more options to build more cheaply made constructions, that don't fit our neighborhoods
Duplexes and triplexes should have an affordability requirement.
project needs 6 month delay.
Yes Yes Yes
This is a mistake, it has the potential to incentivize demolitions as it will be financially attractive for builders to double the number of units on the site. One of the stated goals of this project is to reduce or disincentivize demolitions; this does the opposite. With McMansions forced to scale back, developers will be looking to maximize profits in other ways. This will be an easy one. It will also crowd neighborhoods that will rapidly have an influx of duplexes, which is different than the naturally developing duplexes and triplexes that have been woven into these neighborhoods over the years. The goal seems to be to allow and spur that natural development again, but at the current speed of construction it seems unlikely that it will be a slow natural meshing into neighborhoods. It will be fast and jarring and will change them substantially.
We definitely need to allow for a greater range of housing types.
Are there design guidelines for corner tri-plexes? I worry that the developer driven development (vs. home owners with ADUs etc) may still try to use space and design to their economic advantage and we will get soul-less, maxed out parcels. Also, I'd like to know more about ADU building code. I think these buildings are not necessarily just 'small houses' and can function a bit differently. Ie, loft bedrooms turns a studio into a psuedo 1 bedroom which is great for single person or couple. We need to design for flexibility of living styles. We aren't all married with 5 kids and a dog.
Yes, there is more need for dwellings with universal design features.
I would remove the visitability requirement, or alternatively, require it with one more unit allowed (so triplexes and quads instead of duplex and triplex)
Please do not do this. This increased density miles and miles from the job centers of Beaverton/Hillsboro, Tualatin/Wilsonville and Vancouver will destroy the livability of Portland. The new urban residents will need and are currently using cars to get to their suburban jobs. That is why Portland is now one of the most congested cities in the country. Put all high-density housing on hold until there are high-density jobs to go with that housing. Stop destroying our neighborhoods so Intel engineers can live far from their Hillsboro jobs.
Yes. Density is good.
The city has a severe lack of duplexes and triplexes. I would love to be an owner-occupier of a duplex or triplex, but they are so limited in number that I've been unable to find and purchase one.
I strongly support allowing these housing types by right Citywide. The opportunity for housing abundance and diversity should be given to every property owner by right. Walkable housing density (min 20 Hh/net-acre) should be allowed by zoning Citywide, regardless of current frequent mass transit access. This would dramatically reduce Portland's carbon footprint over the coming decades and is imperative if we're to meet goals of the 2015 Climate Action Plan. We need only look to our much-loved historic streetcar neighborhoods to understand that housing diversity at ~20 Hh/acre is downright magical in its synergy for cultural appeal, transportation ease, and carbon efficiency.

There has not been sufficient study by the City to support aspects of this 'a' overlay zone, particularly that part that would allow ADRs. What study results support a conclusion that ADRs would be used for long-term occupancy rather than short term rentals, which would do nothing to increase density?
The feeling of predominately owner occupied neighborhood is far different from tenant occupied. The long term vested interest in owner occupied neighborhoods was changed in inner SE in the 60's and 70's, and the neighborhoods involved felt torn up by multifamily housing. The suggestion that renter occupied housing is going to solve problems in neighborhoods doesn't seem like its paying attention to PDX history.
I am opposed to increasing the density in already-dense neighborhoods. Inner SE has already borne the brunt of development, resulting in a decrease in neighborhood livability. Let's look at the needs of the people who already live here rather than the needs of people who haven't even moved here yet! Also, other areas of the city are less densely developed. Why not develop them more?
Please allow a larger FAR bonus for houses with extra units. The "visitability" (accessibility?) features are great. Could you encourage them for more units?
No comment.
The city is not thinking rationally if they believe a large or even a significant number of homes are going to be converted into duplexes or triplexes. The cost to convert or add, the knowledge and skill and patience to get through the permitting process and the increased property taxes... why would the city think this is going to have any impact on existing structures or count any real impact to affordable or increased housing is delusional.
Until there are definitive density goals for each neighborhood, the overlay zone will create incentives for developers to demolish perfectly healthy starter homes, if a seller is solicited (ad nauseum) by predatory developers wanting to capitalize on demolishing a single family home on a corner lot and building a triplex, and how many ADU's?
This form seems purposefully unfriendly for residents to fill out without some kind of background in city planning. That said, I oppose the effort to change Irvington into a higher density neighborhood. Part of the historic charm is having a safe family friendly oriented neighborhood close to downtown. If you allow higher density you will radically change the feel of what the neighborhood was intended to be. In addition you will not create affordable housing as it is one of the costliest neighborhoods in the city. We are already having to deal with the changes allowed by airbnb. Frankly, whose to say these new dwelling won't be used to serve tourists rather than locals? Please rethink the effort to increase density in Irvington. Thank you.
Agree
No opinion on impact
Need to create affordable housing otherwise demolitions will increase because Land is more valuable than the home. RIP increases demolitions.
I am opposed to this change.
Allowing triplexes with additional FAR on corner lots will create bulkier buildings at locations where the extra bulk is most prominent.
All good ideas. Completely in favor of the new 'a' overlay zone. It should be everywhere!
It is important to provide multiple types of housing instead of just single-family houses and apartment buildings. However, there is nothing in the current proposal to ensure that the additional housing types being allowed will be utilized for increased homeownership or long-term rentals instead of short-term rentals. Provisions should be made to limit short-term rentals so that the allowance for new housing types actually accomplishes the desired effect of increasing available housing.-

limit by a standard percentage (e.g. 15%) the number of lots on any given city block that can be developed in this manner so to preserve the integrity of existing neighborhood character. Prevent neighborhoods from becoming "motel zones"
Many existing larger homes could accommodate more than one attached (internal) unit. This would provide dwelling space, preserve historic design, and produce income for homeowners.
Either change the whole city or not at all. Portland needs to all be part of the solution instead of the Eastside having to change out of proportion to the west side.
Look. "Portland" has all these housing issues but all of Portland is not subject to overlay. Change the whole city or not at all. East is already more dense than westside but they have more money and clout. Just because we have more buses on the eastside is no excuse for tearing down our neighborhoods. Your planning is elitist. You protect the wealthier westside.
Agree
Are these types all disallowed if no units are visitable? Seems like you'd get a low fewer of these additional housing types by adding that requirement, since extra remodeling would have to be done to split a duplex for example.
Why are you suddenly counting ADU's as part of density? Because of this 'a' overlay you are talking about doubling and even tripling density (unit counts) within traditional single family neighborhoods. You are proposing to completely change the character and integrity of single family neighborhoods just because city planning irresponsibly did not accommodate the "missing middle" in its housing planning. I also note that you are proposing all this increased density predominantly (over 90%) on the east side of the river with the West Hills area being untouched. Why are you protecting their integrity and densifying the east side? Are you reducing setbacks for triplexes on corner lots or just allowing a greater bulk and building height (in contrast to single family houses)? I think you need to go back and redo your housing needs assessment to include a missing middle rather than to stick it all in east side single family neighborhoods.
Allow buildings that go up to 8, hell, even 16 units! There are MANY examples of older buildings and apartment courtyards in inner Portland that could very much be reproduced, and have MUCH more density per lot. Allow greater number of units, especially for permanent affordability attachments. Absolutely agree about the visitability features for older residents of the city and ADA-need individuals Allow EVEN MORE FAR so we can have quads, 8-plexes and larger buildings. This will only recreate historically accessible and dense neighborhoods that are in high demand, especially for better jobs and transit opportunities.
This will destroy trees and natural habitat for wild life, and lead to a much less healthy environment. Older people will be forced out of their reasonably sized houses and yards because the neighborhood will no longer be desirable. It's clear that older people like us are to be gotten out of the way to make room for a building frenzy.
make sure there is affordable homes.

## 6. Apply the new 'a' overlay zone in select areas.

- **Apply the new 'a' overlay to properties zoned R7, R5 and R2.5 within:**
  - ¼ mile of centers;
  - ¼ mile of corridors with 15-minute bus service;
  - ¼ mile of MAX stations;
  - Inner ring districts; and/or

- Higher opportunity housing areas (with services, amenities, jobs, schools, parks).
- Reduce the new 'a' overlay based on infrastructure and environmental constraints and in areas with vulnerable populations at risk of displacement.
- Expand the new 'a' overlay based on proximity to amenities, such as community centers, parks, schools and multiple bus lines.
- Remove the existing 'a' overlay (Alternative Design Density overlay zone) from all properties. Delete the current 'a' overlay zoning code provisions.

Eliminate the 'higher opportunity housing areas' element. The concept not been well explained...and leads to widespread rather than concentrated density increases (which could add to traffic congestion and reduce livability). Moreover, the gains from adding more housing to areas with good schools will prove elusive if those schools are already at capacity.
No because poor people will still be pushed out and have even less access to services in their neighborhood such as neighborhood house, decent schools, churches and other social services. This is all for developers under the guise of helping the less fortunate.
Where is the proximity to amenities in the Vermont area?
Please don't limit the a zone any further than you have already. I believe this whole city should be eligible for these new gentle infill standards but I understand that push-back from certain neighborhoods is why you must limit its applicability. Please don't limit it any further or it will become a tool that never gets used.
Remove the 'a' overlay. This will be exploited by developers and ruin neighborhoods. Continue to evaluate ADUs and duplexes case-by-case.
This new overlay zone should be allowed everywhere. Why limit it to only certain areas? If it is good for some areas why isn't it good for others? I think these things are good and should be allowed everywhere. I don't think they will lead to displacement, they will lead to more affordability which will prevent displacement.
Apply the 'a' overlay citywide Explore other displacement strategies in vulnerable areas, rather than eliminating the potential for increased density/more affordable homeownership options
Scale the 1/4 mile down to 1/8 mile and not along the corridors. We need to keep some residential neighborhoods. We need to work more with the 2035 comprehensive plan. The main development needs to be around the city centers making these walkable.
I strongly disagree
Well, it's not exactly "select areas", as it seems to be the majority of the city under this proposal. I guess I'm OK with this IF new home sizes are scaled down further, demolitions are restricted, and affordable housing is encouraged (as in Q1 & Q5 responses).
Seriously? This is the vaguest set of criteria for application. Again, rather than providing sensible growth throughout the city, this set of criteria allows for the "inner ring districts" and "Higher opportunity housing areas (that name in itself says a LOT)" to increase in value with no consideration to productive use of outlying neighborhoods. How is this being passed off as a benefit for the city? If the city's stated goal is diversity, equity, and smart growth this fails at all three.
ok
This proposal unfairly and disproportionately targets the inner eastside.
Again, this only detracts from home values. This does not protect existing home owners by devaluing the livability within a neighborhood.
See comments above. Time to balance the economic imbalance between east and west Portland

How does this affect my property?
Ensure that infrastructure is developed alongside housing.
O.k.? I assume you have good reasons....
Allowances should be different in different zones. Higher density zones should allow more; lower density zones less. That would be more consistent with the reasonable expectations people had when they bought their properties.
This is not great in Homestead neighborhood: despite the fact that we are immediately adjacent to Barbur (which has frequent transit) the hills in our neighborhood are very steep, and our neighborhood has NO services, supermarkets, restaurants, etc. So it really is impossible for any elderly people or single families with kids to go shopping without a car, and topography has made garages impossible on several properties. Since this overlay also can allow development without parking provisions, the increased density without parking would make our neighborhood unlivable except for the very strong and healthy, who could walk several miles with a few bags of groceries a few times a week, or have all of their food delivered. This overlay needs to be adjusted to consider topography or the no-off-street-parking exemption needs to be removed from our neighborhood
REMOVE EXISTING A OVERLY FROM ALL PROPERTIES and DELETE
I definitely agree with all of these, and really feel that if we are going to be a smaller ( denser ) large city , we need to embrace , "Filling in the blanks, so to speak
AGAINST
The economic status of residents is not an appropriate criteria for where to apply the new 'a' standard. The appropriate criteria should be where it will do the least damage to the character of existing neighborhoods.
1-4 mile on each side of the corridor in the inner SE (Burnside/Stark/Belmont/Hawthorne/Division) comprises (almost) the entire area - it does not provide "corridors" of zoning, it just upzones the entire area. This is not acceptable, nor is it in the spirit of the stated purpose of the overlay zone. 500' is a maximum I could find acceptable.
Seems to make sense, but commutes and ease of managing everyday life will continue to be more challenging.
The statements here contradict themselves. Remove the 'a' completely.
Additional housing structures would increase traffic density and incongruous array of housing types. Neighborhood tranquility, identity would fade away.
I am opposed to the new "a" overlay, and don't believe it should be applied ANYWHERE. Dense development is already zoned in the center, along transportation corridors and in inner ring districts. I don't see why that needs to change. How are "higher opportunity housing areas" defined? This is subjective, and could be argued for any neighborhood. How are infrastructure and environmental constraints defined? Or areas with vulnerable populations? The entire inner city could be considered "vulnerable" based on how unaffordable Portland has become.
I agree with the concept, but believe that 1/4-mile is too large. I think it should be constrained to 300 feet.
Absolutely do not restrict based on amenities this prevents those areas from having the density to support those in the future. Agree with excluding based on environmental constraints, infrastructure should not be a reason to exclude, just need to be strategic (and use SDCs for needed improvements in those areas). Also don't feel that risk of displacement is a good reason to exclude because again, you are then eliminating the opportunity for supporting future amenities and walkable 20-min neighborhoods - just needs to be done with mitigation to reduce displacement. I think eliminating the

a overlay eliminates a key tool to increase housing quantity and options in our community. Not recommended. Please apply to entire city as proposed in discussion draft.
Where is the discussion about parking here?
This gives license to rezone at will, despite lack of infrastructure, lack of sidewalks, crowded schools.
I generally support this standard, except the standard for "vulnerable populations at risk of displacement" as I do not believe land use standards prohibiting density can or will address gentrification. It may even drive gentrification as the areas will be seen as excluding density and people will not be able to find new homes in the same neighborhood. Moreover, it seems a fuzzy standard and not clear and objective.
Outrageous upramp of destruction of neighborhoods in inner N, SE and NE neighborhoods. Absolutely ridiculous giveaway to developers. No NO NO!
This is too broad stroke and doesn't take into consideration established single-family residence neighborhoods.
This "zone" should include all areas in the city, not just those within the areas designated above. We need housing everywhere!!!
Disagree heartily.
I worry that we are making the zoning code more and more complicated, with overlay zones that have special rules. Why not allow this in all R-7, R-5 & R-2.5 zones?
Population displacement has to do with economics and shouldn't be addressed in the zoning code.
Why? What goal is this change trying to achieve?
Definitely yes! We need infill. People need to live places.
NO, I do not agree.
No issue with this
Yes
Great but define an "inner ring district"
1/4 mile is too large for inner-city. Everything is within 1/4 mile of centers, corridors, and MAX stations. And what is "inner ring districts" and high opportunity housing areas? Sounds like you're throwing the entire inner city under the bus. Instead of a blanket overlay, should identify specific areas for higher density development as need arises and provide public process to modify each with a limit on how many can be adopted in any given year.
No
Don't areas with populations at risk of displacement need these new housing opportunities even more? Is this nimbyism disguised as anti gentrification?
support
The radius around MAX stations should be increased to 1 mile, which is within the walking tolerance of many people. (see, e.g., <a href="https://www.citylab.com/solutions/2015/01/what-does-living-close-to-transit-really-mean/384421/">https://www.citylab.com/solutions/2015/01/what-does-living-close-to-transit-really-mean/384421/</a> )
Priority for density increase should be on vacant properties. See above (5).
I object to reducing zones in R5 to R 2.5 it will destroy the neighborhood, destroy green space, and promote destruction of older homes.
This overlay is a bad idea
Disagree!
When done, this will likely mostly concentrate housing in inner east Portland. That is fine, but I think we can find more creative ways to expand this. One problem we have with outer east Portland is that there already isn't great infrastructure, and so tying this policy to infrastructure inherently omits

<p>significant parts of EP. For example, we tie this to public transit, and yet that is woefully underserved in EP. So, what if we got creative and tied it to the low-income fair so that missing middle housing could be built in those areas. Transit and housing can be a chicken/egg situation, so let's be ahead of it. Build the housing and we'll push Trimet to serve better. Question - will the map be dynamic? I believe it should be, in that any time 15-minute bus service changes, the map changes as well, instead of waiting for new action from council.</p>
<p>This may penalize property owners in vulnerable areas, as they would not have as much flexibility with their properties compared to other neighborhoods.</p>
<p>Do NOT allow any changes to existing "a" overlay zoning map.</p>
<p>The idea of the 1/4 mile walk standard is very common in transit planning, but in practice, people are generally willing to walk slightly farther for higher-quality services; in this case, MAX stations and Frequent bus services. the new 'a' overlay should be extended to 1/3 or 1/2 mile from MAX stations and along Frequent bus lines.</p>
<p>These seem good. Why not just include the 'a' overlay allowances in the base zoning since the map shows that they already cover most of the city?</p>
<p>This should apply to as much of the city as possible; it's simply not fair that rich, historically exclusionary areas like Laurelhurst and Eastmoreland don't have to include their fair share of new housing.</p>
<p>no opinion</p>
<p>These features should be folded into the base zone. This proposal seems like it may be a down-zoning vs. the existing (a) overlay. Please reconsider deleting the existing overlay or use it as more bonus FAR or reduce the minimum lot size for the extra units!</p>
<p>seems appropriate</p>
<p>I agree with the new 'a' overlay but disagree with the proposal to limit it. This reduces someone's ability outside the overlay to redevelop / develop their property, akin to virtual redlining. Why would the City want to limit someone's ability to increase the density on their property? Other strategies that are not based in the zoning code should be employed to reduce risk of displacement. Also, as the city grows, transit frequency, employment centers, higher opportunity areas, etc. will continue to increase in East Portland. It's a bit of chicken and the egg; more people are needed in area to get better transit service, attract amenities, have enough foot traffic to encourage small businesses to locate in a neighborhood commercial district, etc. If the folks on the westside (SW) don't want the overlay, then that's okay with me. But don't limit it at all on the east side, especially in areas with larger lots, such as Cully, that could accommodate creative development solutions such as two ADU's, cottage clusters, duplex plus ADU, etc.</p>
<p>1/4 mile is too much, except for MAX stations. Maybe if we had more or bigger parks it would be ok there, but we don't.</p>
<p>Same concerns. Too much density in 'a' overlay.</p>
<p>Agree, but not to limiting to 1/4 mi distance from services in all areas. Some areas that are developing into more vibrant service areas may benefit from being a-overlay zones to encourage this growth.</p>
<p>Seems fine.</p>
<p>Sounds reasonable</p>
<p>No</p>
<p>it looks like this plan is neglects the lack of emergency services and I think it's irresponsible, even negligent, considering the safety issues we already face with the recent population increase.</p>
<p>Why can't people who want the A overlay for their housing ask for it? This might make for a more patchwork approach that is a bottom up application of the concepts but not top down.</p>

I would increase the zone to everything within 1/2 mile of center, corridors with bus service, inner rings, et al.
Again, no. See the above response.
Please continue to keep SFR in R5 ZONES. Single ADU on a R lot acceptable.
one quarter mile encompasses far too many houses, let us not ruin existing neighborhoods, overlays should be on main corridors and perhaps the house next door to them with permission of their neighbors
Already Hawthorne and Belmont streets are being destroyed. The neighborhoods are overrun with meth users, syringes found on school ground and playgrounds, human feces in same areas - how can you manage to bring back our quality of life, while cramming more people in?!
I think the new overlay zone should apply to all single family neighborhoods in Portland.
Reduce the "a" overlay...
I think the geographic constraints could be changed if we tied the additional units allowed to affordability and restriction to housing uses.
This is really unclear and I haven't been able to determine which areas are included/excluded. How can you expect the public to provide an opinion if we can't even understand the options? The only maps I've seen look like zone A is pretty much the entire east side, and that is ridiculous
The Southeast neighborhoods are taking the brunt of development for increased density. This is not fair. Also, there have been no plans that I'm aware of for increasing the number of parks in the SE even though population is expected to increase. This is not good planning.
Do not allow ADU's with a new 'a' overlay zone. It is bad planning.
Support expanding opportunities for housing as widely as possible
"a" overlay within a 1/4 mile is too extensive.
Allowing the new overlay around transportation hubs without limiting the size of the dwellings to make them affordable is unlikely to fix the housing crisis, likely to make traffic worse.
No. Reduce 'a' everywhere.
"Within 1/4 mile of corridors with 15-minute bus service" casts a wide net, especially if the requirement refers to peak bus service on routes that decrease to 40+-minute service on weekends and evenings. It would encourage the demolition of sturdy, intact houses around 7 deep from traffic corridors. Infrastructure, environmental, and vulnerable population constraints are good but displacement should be a consideration everywhere.
NO new "a" overlay in areas with vulnerable populations. This overlay will only promote additional gentrification.
The 1/4 mile covers all of inner SE placing an undue burden on, and essentially destroying, these neighborhoods. This entire scheme should be revised in order to avoid such destruction.
Yes. However, I would argue that this should be applied throughout the City. Why all the borders and boundaries? Seems arbitrary. Environmental constraints can be achieved through conservation and preservation overlays that are already in place. Up the incentive for affordable housing= more FAR to deal with the vulnerable populations issue.
Opposed. Not all R5 neighborhoods are appropriate for this just because we have a school or park.
I'm concerned how you will determine an "at risk" population. There may be opportunities for at risk land holders in at risk zones to benefit. The determination needs more than a good faith outreach effort.
MUCH too large an area of applicability. Instead, seek one to five model developments which "test" this concept. Following which there can be evaluation, and review, with consideration for greater applicability.

NO!!!! You will destroy the uniqueness and livability of Portland's eastside neighborhoods without increasing affordability. Developers build what will sell for the most money. N
City officials should plan infrastructure and environmental mitigations in a "reality" based system. Bicycles and public transit are a pipe dream and in actual fact city needs to plan for additional private auto use, including parking spaces for each additional residential unit.
Only where no demolitions have taken place. Infill should be for vacant spaces, not for tearing down viable, affordable homes. You should call the project the displacement bible.
great
The new 'a' overlay zone will add more housing options to the city, improving housing opportunity and affordability. Therefore, it is not necessary to limit the 'a' overlay to certain neighborhoods. The new 'a' overlay should apply to all residential zones currently zoned for single-family housing. At the very least, the "1/4" mile halos should be expanded to 1/2 mile -- it's very reasonable to walk a 1/2 mile to transit, schools, etc in most cities. In most cities, is housing typically more affordable in neighborhoods with more housing or less housing?
all you're saying here is, leave the really wealthy folks on the west side alone, penalize the only relatively rich (laurelhurst, irvington, etc).
Vulnerable populations at risk of displacement? Less likely to happen if more affordable housing created in that very area. Doesn't make sense to concentrate the redevelopment even closer in, and in a smaller area.
Areas with vulnerable populations at risk of displacement need as many units as possible; encourage single family to multi-family remodels here, not discourage - A-overlays should be (by walking distance, not as the crow flies) 1/4 mile from centers and corridors, 15-min bus service, 1/2 mile from MAX stations, inner ring districts, higher opportunity housing areas
You are unfairly placing the burden of increased density on SE neighbors, clearly you don't care about quality of life, increased crime or increasing services to support this. Your plan is poorly thought out and represents the NIMBY attitude of portland city officials who are Completely unaffected by these changes. Place overlays on the west side for fairness and ensure equity in services received for taxes paid
No new overlays. Period.
You are redlining East Portland when you look at only in higher opportunity housing areas that is already based on old data. We need to look to the future and East Portland is already facing gentrification
15 minute bus service is not good enough if you expect 125,000 more people to be taking the bus into downtown portland. Cities with the kind of density Portland is envisioning have much more frequent public transportation. And a LOT of people don't want to ride bicycles in the 8 months of the year that it rains here. This density is predicated on services that are barely acceptable now, and will be woefully inadequate if this plan comes to complete fruition. Again, this definition of where the new overlay will be amounts to the entire east side inside of 205. Why not re-zone huge swaths of the west hills and provide bus service up there?
It is not clear how you are determining high frequency public transport in South Burlingame as we do not have bus service on weekends. Our proximal bus service limited service runs M-F, about 6:20AM-7:20PM, running about every 50 minutes. More frequent service is nearly a one mile walk up steep hills. It is not practical to use as sole transportation, nor is it practical for anyone who has any disability of ambulation which may not reach ADA criteria, but are increasingly common as one ages. Reaching services on foot is challenging in this neighborhood as the grocery store from my house is 0.5 miles, without sidewalks and over roughly paved roads that are plagued by increasingly fast traffic as people use the neighborhood streets to avoid the traffic lights.

I don't understand the rationale for excluding St Johns and Cully. Isn't the idea that having more housing choice and supply will reduce costs?
Rose City Park already has small houses. Why focus on this neighborhood? There are areas closer to the MAX and on bus corridors that aren't even looked at.
I oppose.
Allowing duplexes and triplexes on streets in our neighborhood would drastically change the character of our neighborhood and likely reduce property values. And it would ultimately add more cars to our neighborhood roads which are mostly unimproved and in poor condition.
Too many specific considerations that can work in favor of special interests on either side of the economic spectrum. Stick with only the first bullet point.
Recommend that the application of any overlay zoning be guided and require approval of neighborhood associations.
this is basically the entire city. Do you think people understand what this proposal means?
Not sure I understand this one either. All of these will have unintended consequences. I feel that I can't tell what these consequences will be, and so I don't know if I like this.
Again, way too restrictive; please allow people to live in our city
a 1/4 mile is too wide. you will destroy neighborhoods. Build vertically only along 1/8th of a mile or less. Increase density that way and insist that infrastructure is built in at the same time. pay attention to environment, risk populations. Increase bus service BEFORE building. Then people will use it more.
1/4 mile of corridors, MAX and the others includes simply way to much of the neighborhoods we call home. That would forever change the dynamic of our homes and neighborhoods. No!
Yes
Keep zoning as it currently stand!
I refer you to my earlier comment. The South Burlingame neighborhood should be excluded from this alternative (a) overlay.
yay
Sounds good.
Scares me to think of the density of my own street if this 'within 1/4 mile of corridors' overlay is kept.
Hasn't the state mandated that *any* SF residential zone is allowed to have duplexes?
Apply it to zones R2.5 within a quarter-mile of 15 minute transit service
YES, PLEASE!
Why is this written in complex jargon only City planners can understand? This seems like it's done to make sure you can push through your agenda. What are the implications of this? What does it mean in real life? How will it change the face and character of our neighborhood? Why did you designate only the areas with the cheapest and smallest homes? Why not encourage knocking down the giant homes on the ridge and replacing those with 4-plexes?
As above?
See comments above about privacy expectations. Being ADA accessible does not give a pass on everything else.
Agreed
These limitations are pretty useless as they apply to most of the city.
I disagree with this. Need to consider whether it is appropriate to the neighborhood, not just a blanket overlay. We need to preserve historic neighborhoods.
See my last answer.

<p>I OPPOSE in the strongest terms the 1/4 mi. measure from 'centers' for adding housing density. Example: I live on a hill 1/4 mi from Barbur Blvd. which is only accessible if you cross the Terwilliger bridge. It is not the same issue as other flat parts of Portland where you have multiple ways to get to a 'center' street (think Hawthorne or Division as examples). No buses serve the hilly streets, they are NEVER plowed or de-iced, so any form of walking-biking-auto is limited. Add to this your acknowledgement that our population is aging and therefore getting around will be even harder for many of us for nearly a generation. Keep your 'a-overlay' restricted to the main thoroughfares like Barbur Blvd., B-H Hwy where you can allow 2-4 storey buildings with mixed use options and allow more tranquil neighborhoods with single family homes to remain available within SW Portland. Do you really want to push people out to other counties?</p>
<p>New a overlay should be applied consistently across the city or not at all.</p>
<p>Allow the "a" overlay everywhere. And even if you did limit it, the walkability distance from light rail stations is 1/2 mile, not 1/4, so that has to change. It does not make sense to not apply the "a" overlay increased housing opportunities based on infrastructure or displacement risks. Some areas need additional infrastructure, like sidewalks and better transit. But by not extending the "a" overlay, you are consigning them to limbo, and then the city will later be shoe-horning in the types of housing we are talking about now and wishing it had allowed these originally. And, improved transit service is a chicken-and-egg problem. Similar with the concern about displacement - affordability pressure is going to happen anyway in certain neighborhoods, so couple the "a" overlay elements with measures to mitigate the displacement. And expand the "a" overlay to all single family zones.</p>
<p>Hmm. Makes some sense but it also kinda sounds like the new "a" overlay won't affect people who live in more affluent areas but it will the rest of us. That doesn't seem fair.</p>
<p>Do not restrict the overlay by areas with vulnerable populations at risk of displacement. Everyone in the overlay zone and throughout the City are at risk of displacement. Do not remove the existing "a" overlay from all properties. Maintain the current overlay throughout the City so that ADUs can be built throughout the City.</p>
<p>NO! You are forgetting about side walks, green space, parking space, etc. This will only create more problems if the original ones, such as no sidewalks or bike lanes don't get addressed.</p>
<p>See comments on lack of a overlay in SW &amp; N W side of river. Not fair to east side. Smacks of West side elitism.</p>
<p>I support these changes.</p>
<p>I generally agree with the mapping, but am concerned that, instead of reducing displacement, leaving areas like East Culley out of the overlay will result in these houses being replaced with large single houses, instead of allowing the owners to add small units that could rent for affordable prices.</p>
<p>A overlay will encourage more demolitions and more poorly designed housing because of inadequate design controls.</p>
<p>I don't understand why this plan concentrates so viscosly on single-family zones. If you are trying to create additional affordable housing, concentrate on apartment/coop buildings. Leave the existing traditional neighborhoods alone.</p>
<p>This should be your plan to allow for higher density living: Restrict high density housing to main thoroughfares; Division Sreet, Lombard Street, MLK, 39th Ave, Belmont, Burnside... Leave the inner neighborhoods as sacred spaces for families to enjoy as safe places to raise their children.</p>
<p>Yes. I support these changes. Especially places that are close to transit lines and high opportunity housing areas should have more available living spaces.</p>
<p>Define parameters for constraints. Proposed and designated 'a' overlay zones are currently pressuring existing single family home owners with increased costs to upgrade infrastructure including sewers, streets, sidewalks and property taxes. When built these were conforming</p>

properties and existing conditions. The new triplex, duplex or house next door shall bear the cost of the improvements for downstream properties.
15 minute bus service going to/from downtown at peak hours? How will people get to jobs/services not downtown? Didn't we spend the last four years looking at zoning lot by lot in the Comprehensive Plan? Why does this project ignore decisions already made?
I disagree with the peanut butter approach to density. I believe the existing base zones were well thought out, creating density transects that focus increasing density on transit and commercial corridors. With RIP, we will see random distribution of multi-family housing, with some of it in locations where people will still need/want to drive and/or own cars. I believe a better approach would be to widen the R2.5 zones that surround corridors by one block. In addition, we need to massively upzone areas around MAX stations to increase development of places like Holgate/17th which are sitting vacant.
This is absurd and terrible policy. To quote a friend: "The RIP robs our most vulnerable residents of housing opportunity by redlining them out of the "housing opportunity" zone. This is the most egregious aspect of the current RIP draft. The new (a) overlay quite literally redlines certain working-class neighborhoods out of the "housing opportunity" zone. This prevents lower-income and minority homeowners from adding units and creating opportunity not only for themselves and the neighborhood, but also for future generations. (This, in fact, is the very definition of "institutionalized racism" and what has barred minorities in this country from accumulating generational wealth for centuries.) By disallowing certain (lower-income) homeowners from adding units while allowing certain other (upper-income) homeowners to add units, the RIP deliberately and systematically redlines lower-income residents out of housing opportunity. City staffers will counter that the lines for the housing opportunity zone were drawn to exclude lower-income neighborhoods "in order to combat displacement of vulnerable populations." Does the RIP create housing opportunity? If so, why aren't we creating *equal* opportunity? If the RIP *doesn't* create housing opportunity, then why does the RIP exist at all? While [at best] well-intentioned, city staffers' explanation for excluding minority and lower-income residents from the "housing opportunity zone" skirts the real question: Why are staffers and commissioners deliberately and systematically redlining lower-income neighborhoods out of opportunity? Why is the housing opportunity not an equal opportunity? We can be sure, policy-makers believed they were "well-intentioned" when they red-lined minority-dominated neighborhoods out of opportunities for homeownership in the 1950's. How will future Portlanders look back on our current elected officials and their decision to redline low-income areas out of housing opportunity today?" I can't stress enough how this proposal needs to be evenly implemented in ALL neighborhoods, on every single single family zoned property in this city, or not at all. If you don't give everyone the equal opportunity to provide more housing, then you are not doing your job.
Remove A overlay entirely. It causes the change of historic neighborhoods that developed without overbearing planning and created the quaint Norman Rockwell type neighborhoods common to Portland. The wisdom of the crowd is superior to the wisdom of the elites trying to tell everyone what is best for them. The entire housing cost and shortage problem has been created by government top down planning. Although well intended it is an example of unintended consequences. A city unaffordable to middle American workers.
Again this will change the look of neighborhoods and is not acceptable
No. General comment: You could do everything right with this project, but it will be a miserable failure unless you get a handle on traffic and parking. Do not even think about increasing density until you know how to avoid turning neighborhoods into parking lots. Where "no parking apartments" have been allowed, they are a disaster.

Like 1/4 mile of centers, corridors and max stations. Recommend filling in gaps between the bubbles like the proposed map does. Hold more conversations with the residents of vulnerable populations about whether or not to offer 'a' overlay zone to their area. They may want it to help bring in infrastructure and amenities.
This is nonsense. All you did was change the name of the 'a' overlay and throw in the term visitable which is undefined anywhere on the BDS pages.
A bit complicated - but certainly "green" provisions. Who gets to determine which areas are "vulnerable to displacement" and what criteria? does this encourage or discourage new high density areas? with higher density, mass transit should be expected to follow suit....
No need for more regulations
No. See above. And I notice the "selected" areas are all on the east side. Why is the west side so lucky as to not be subjected to all this?
I disagree with changing R5 zoning to R2.5 due to proximity to services. This will allow too many structures in certain "pockets" of our community, The R5 to R2.5 zones will be congested, a mix of multiple designs and will reduce livability and current property values for established homeowners. In addition it may create years of ongoing tear downs and construction once again negatively impacting livability. Finally, I have to ask "what services" and how many years will it take to implement the supposed services. This does not make sense as far as allowing more density in specific pockets.
I think maybe limiting these "a" areas to start with would be a good idea (fewer than currently allotted; if I am reading the map correctly, it seems like so many) and then, after you see what happens, expanding them over time. Allowing the potential to build in so many areas so fast might have unintended consequences - like in East Portland after 1996.
This proposed new "a" overlay builds upon previous failed policies of the "a" overlay and duplexes on every corner. Since 1991 only 3.5-5% of all corners resulted in duplexes. Since 1995 the "a" overlay resulted in 212 additional units out of 45,420- less than .5%. That's point 5 %. Extrapolating these projections over the 100,000 houses (approx) in the R zones will NOT meet the goal of 20% growth in the SFR zones as stated.
I would be for all of this if it included a strong anti-demolition policy. If you don't restrict demolitions, then I vote no to such massive re-zoning for duplexes and triplexes in single family house zones. The best plan would be to try a pilot project. Please create code that will let me subdivide my 100 year old house but keep it from being demolished!!
Densification should be allowed across the board in all residential zones. Homeowners looking to subdivide their home into a duplex or add a basement/garage ADU benefit everyone in this housing crisis - they should not be punished or restricted based on location.
support
i don't know how you determine the new overlay zone..i would be cautious in making it too small.
The new a overlay should be applied to all residential zones areas.
Here's what your new "a" overlay will accomplish. Those people with already valuable real estate (i.e. in areas not identified as areas with "vulnerable populations") will be the ones actually given the opportunity to further increase their financial standing and net worth by developing their property. Those in the redlined areas who are not given the opportunity to develop their property won't be able to add a unit and benefit from rental income or increased property value. It's very simple and all one needs to do is look at history as it repeats itself. This is institutionalized racism and while it may be well-intentioned by a few decision-makers working for the city, the unintended consequence will be the further polarization of the haves and have nots. If Portland is going to extend opportunity to some people, why is it doing so to those who already have a certain degree of opportunity, and not to those with less opportunity to begin with? Further, the new "a" overlay is not only weaker in terms of

allowable density than the current "a" overlay, but it also encourages smaller units while discouraging 3 bedroom units, and therefore families. The current "a" overlay gives density bonuses for 3 bedroom units. Where will families live when almost all new housing built is 800 square foot units?
This is overly large and erroneous in its assumptions. We should be addressing the outer ring districts to encourage the development of amenities that inner ring districts currently have - not destroy what works now.
People who live in the close-in neighborhoods already pay higher property taxes - and now their neighborhoods should be subject to more lax development rules? I think not.
Do you really care about populations of risk? Elderly can't climb 50 steps throughout a house or to get to the front door. Where can people in wheelchairs live if we destroy all ranch style homes. Oh I get it, disabled and elderly aren't citizens of risk
Please apply the new 'a' overlay to all single-family dwelling zones. If that is not possible, please expand the overlay to within 1 mile of centers, corridors with any type of bus service, and MAX stations. Please retain the overlay at areas deemed at risk of displacement. Restricting housing choices is not among the tools cited as effective by Lisa Bates's BPS-commissioned 2013 report, "Gentrification and Displacement Study: Implementing an equitable inclusive development strategy in the context of gentrification." Research does not support reducing housing choices as a mechanism for preventing displacement.
We do not support expanding the 'a' overlay allowance to new zoning types. The development of higher density through 'a' overlays should be directed to appropriate zonings that already support multi-dwelling properties. Neighborhoods with single detached houses should not be infiltrated with new detached accessory housing units.
the central eastside has no amenities like a library, public park or recreational center...2012 bond promised after city RFP for proposal, but never issued...5 years later the density is rapidly increasing and sidewalks are shrinking and there are no North/South bus lines between 39th & MLK...!!!
Change milage parameters to 1/2 mile
OPPOSED! Closeness to a center or bus or max is not a measure of what constitutes a neighborhood. Why not ask the people who live there???
I think the first option holds the most interest for me. 1/4 mile of centers, corridors with 15-min bus service, 1/4 of MAX station, etc.
no
No, being near a transit stop should not dictate architectural context. Create density in new development NOT replacement development. In other words don't destroy the rhythm and character of a neighborhood just because it's x distance from a transit stop.
put the rip up for a vote by the people, that is the only fair thing to do....disastrous decisions ruin cities
6. See response to 5 as well as I expect that there is a misprint on the survey that stuck the visitability issue in 6 as well. First, I believe that any zone R7 and above should be abolished as it doesn't allow for the 20 minute neighborhoods that Portland aspires to in the Climate Action Plan and elsewhere. Although I would rather have residential infill CITYWIDE, and do not believe that would cause the water and sewer problems alleged, I'm okay for starting with the locales in the first bullet. But I'm not for limiting "areas of vulnerable populations at risk of displacement." By depriving those populations of the ability to expand their housing into multiple units, you are condemning this and future generations of wealth-building tools. I'm very concerned about displacement myself, but I believe excluding vulnerable populations is NOT the way to stop it. Perhaps sponsor some Portland Small Developer workshops for property owners in those areas instead.

I am opposed 'a' overlay zones in selected areas. There is adequate land to build dense housing along centers and corridors if proper infrastructure is developed. Don't destroy existing neighborhoods.
Disagree with mandating this in all neighborhoods
Please examine the claim that this overlay might cause displacement more closely. Will constructing more low- and middle-income affordable housing actually bring about displacement? Additional affordable housing capacity may help those communities better weather an influx of wealthier buyers.
disagree with a overlay proposal
Clarify how define higher opportunity housing areas--who decides?
Remove the existing 'a' overlay from all properties.
Not in historic districts
The ADU should be attached to the existing home with a separate entrance. It should be built by the owner, not with City dollars. Incentive should be tax abatement. Little houses should not be built by the City. They are too private and will become slums in no time. They destroy property values.
Remove the overlay.
I am only in favor of demolishing buildings on busy streets that are not historic and do not contribute to the character of the neighborhood and putting in mixed use. STOP DESTROYING OUR NEIGHBORHOODS AND OUR QUALITY OF LIFE. I did not sign up for living like a sardine when I bought my house over 20 years ago. We MUST preserve our neighborhoods before it's too late!!
Public transportation, yes, but not at the expense of neighborhoods.
The structure of this question is confusing. Generally, the "a" overlay is too large, particularly its inclusion of zones R7 and R5. I think some of the approaches above in selecting locations listed for inclusion are reasonable, but the city should retain some flexibility in assessing situations and characteristics unique to particular locations, rather than a "Blanket" approach to implementation.
Get rid of these overlay zones entirely. Respects the original zoning.
If this means a developer could acquire and demolish all of the single family homes in Westmoreland and Eastmoreland that lie 1/4 or less from the Max station, and replace those single family homes with multiple units, then NO, I do not support this.
Parking must be provided. Many new multiple dwellings have been allowed to have no parking. They are going to create traffic jams and congestion because of dense street parking
remove the overlay and restore the zoning we were promised when we purchased our homes
There are plenty of neighborhoods around portland, all the way out to Gresham on the east side, that could use a restorations. Zones do not need to be changed or overlaid. You are creating needless pressures on neighborhoods that don't need or want change. Look at the neighborhoods that do need change. Developers who claim to be building affordable housing on split lots are building 2 houses that each cost more than the one that they tore down.
Delete ALL "a" overlay zones. This effort is reducing affordable housing by creating incentives to destroy existing housing in favor of multiples that each cost more. You are accomplishing the opposite of your stated intentions.
No, no, no. No overlay. I view this as an assault on our established neighborhoods all over the east side.
The overlay zone is completely wrong. Needs to cover the entire city or none of the city. Discrimination against east of the river is unforgivable.
6. Reducing density in areas at risk of displacement is a horrible idea. This will lock in these areas as low income ghettos for the next generation, by depriving those areas of the economic tools to rise above their current meager situation. Shame on you for floating such an awful proposal.

Too complicated. Make these changes everywhere. Rich home owners will just have to deal with it. They already get everything they want.
Put the A zone on every residential, y zoned parcel in the city. If housing is important, then step up and allow more of it.
expand the new 'a' overlay wherever possible -- more housing=more affordable
These sound good. I think these opportunities will help vulnerable populations so I don't think that part is necessary.
That there is even R2.5, R5, and R7 within 1/4 mile of MAX stations and 1/4 mile of 15 minute corridors is a failure of zoning as these are not densities that provide a ROI for these public services. So improve the overlay by making it allow for enough units that it promotes the resulting occupancy up to R1, RH, RX.
Expand the new "a" overlay! Please smartly densify this city! Also, please allow some small commercial spaces to be included in residential zones.
Why limit the areas of the overlay? In areas where people are at risk of displacement, these areas should allow greater density, not less.
Objective?
NO MORE DENSITY!
Yes thank you! Wonderful!
SW Portland doesn't have sidewalks. We have terrible storm water management. My yard and my whole neighbors flood their back yard because of uphill neighbors landscaping and drainage. If you remove more green space and yard space we won't be able to cope. City isn't going to pay me to fix it, but I already have to spend over 10,000 because of this. We won't even talk about car congestion or parking. I live here and pay huge taxes for livability. God knows you aren't going to lower taxes.
I REALLY wanna know how you plan to allocate "risk of displacement." It seems like a shitty way to skirt adding more density that could actually serve communities that need more housing. It sounds like this is a tactic to keep density small and thus raise property values, thus effectively killing the poor and working class's chance of actual stable housing.
Still too restrictive to get the inner city density we desperately need.
Great!
This seems unnecessarily complicated. The change should be universal within that zoning code. The economics of the build will mean that very few ADUs are built in areas with low amenities since they wouldn't pay for themselves.
as above-totally inappropriate and will the character of this city.
ok with this
east Portland needs investment. cutting east Portland out of the opportunity for growth and asset building that the R.I.P. will bring hardly seems right. further, as a neighborhood becomes more dense amenities such as transit, restaurants and improved schools may follow.
This new overlay zone would cover most of the established single family neighborhoods in the city. This would be one of the most significant zoning changes in the city's history with very little investigation related to impacts. I just returned from spending Thanksgiving in San Francisco and as you know the cost of housing there is extremely high, but the density that is proposed in this "a" overlay zone is less than the density in SF. So, apparently building in more density doesn't lead to more affordable housing. Same situation in Brooklyn and many other cities. Affordable housing is not related to increasing density, so please don't say that it is!
Same comment as above: As long as measures are taken to do everything possible to preserve existing residential structures, then allowing a home to have 2 ADU's- one internal and one external is

<p>fine. Same with allowing for internal conversions to create duplexes or triplexes. Without sound protections for existing housing built into this provision, this essentially up zones the entire overlay, and up zoning increases land value, but not structure value. Increased land values result in more demolitions of sound, affordable structures to be replaced with expensive units. So as long this provision only applies to existing homes being retained, then this will hopefully increase density in an organic way. If the result of this overlay is increased demolitions, then it's like unleashing a trojan horse.</p>
<p>Apply the same rules to all residential areas of the city, except for vulnerable communities</p>
<p>I do not support allowing duplexes and triplexes with added ADUs anywhere in a R5 housing opportunity zone.</p>
<p>Yes.</p>
<p>No "visitable" requirements.</p>
<p>This question refers to "the following housing types" but does not list them. This is a good proposal and should apply to all housing types, including apartment buildings.</p>
<p>I strongly, vehemently disagree with the 1/4 mile distance to centers/corridors, etc. A 200 foot distance is best, with 400 feet a compromise. Also, applying this to all inner ring districts is outrageous and will inevitably diminish the fine character of Portland's residential neighborhoods. DO NOT DO THIS! You need to start including EXISTING residents in your planning efforts.</p>
<p>Not sure I know what "A" means.</p>
<p>I believe this is overly expansive. You'll note from the map this includes every property of inner Portland and most even farther out.</p>
<p>Allow the "housing opportunity" provisions in all areas of the city to improve equity outcomes and encourage the creation of additional walking scale neighborhoods.</p>
<ul style="list-style-type: none"> <li>• Adding housing without requiring adequate additional off-street parking to areas that already have narrow, poorly maintained streets that lack sidewalks will increase the risk of human-automobile interactions.</li> <li>• Expecting that the additional population will not own, park, or drive cars is unrealistic.</li> <li>• Expecting that the additional population will increase ridership on public transportation without adding sidewalks on the roads leading to the bus stop is unrealistic.</li> </ul>
<p>Expand in any way!!</p>
<p>While I understand the transit-oriented intent, I think that will increase cost and pressure in those areas per my previous comment. If we increase density everywhere, then eventually, we can improve amenities and transit access everywhere, thus making a more robust and equitable city.</p>
<p>Good</p>
<p>Please apply the new 'a' overlay to all properties throughout Portland.</p>
<p>This Overlay Zone rule means that essentially no part of the city (apart from select portions of the West Side which have been preserved to spare no doubt the Mayor and other denizens of City Hall and their best-paying constituents) will be safe from densification. There are no "select areas" as 1/4 mile from any of these mass transit or higher opportunity housing areas covers the whole city (except the parts exempted by West Side politicians). The zoning code provisions of the previous Alternative Design Density overlay zone can be swept away with no public process and replaced with essentially a blanket mandate for densification and demolition of existing structures. It's obvious that this destruction of the existing zoning will force the old Portland to cease to exist overnight and allow developers to do what they want, with the blessings of City Hall. Due to these requirements, a structure is already being built in my neighborhood that is over 10 stories tall because it is on a bus line! It is fatuous to suggest that all of the tenants will ride public transportation just because their building is on a busy street. Meanwhile, all of their cars will flood the existing single-family detached</p>

neighborhood streets. Your RIP proposal wants to recreate the population density of New York or San Francisco or Seattle, but on Portland-scale streets. It is obvious that this will make the area totally unliveable as traffic and pedestrian fatalities rise, lost hours in rush hour traffic increase, etc. But developers wrote this proposal--not city planners or engineers. That much is obvious by RIP's total failure to account for the people who already live here, who own the land, and who will fight to preserve what is theirs. This is not the end. This is only the beginning.
No new overlay unless put to a popular vote. How about trying all these things on vacant land and creating spanking new neighborhoods? Apparently we can make great neighborhoods—let's just make more?! How about cutting scrapping this project and spending what's left of the budget on classes to encourage volunteering (this helps make great neighborhoods) and compassion (say, for people less abled, less fortunate moneywise, less educated), but still people who have much to contribute. All the luxe plexing proposed scrubs a neighborhood of its old-growth housing and diversity of people and income.
How about not allowing selfish people to buy housing that they don't live in and use only as a financial asset? How about demanding affordable housing be built and a moratorium on demolition of our housing stock? "ADU's" should only be built underground.
NO overlay changes to R5 or R7!!!
I think the a overlay should be expanded across the city. however if you all decide to limit it, you must create a provision to redraw the boundaries if Tri-met changes it's 15 minute bus service. There are plans to add a 15 minute bus service line on Prescott street, affecting the 72, which would impact the way the map is drawn in Cully and Beaumont-Wilshire.
Should apply citywide. The new HO zone applies in a lot of places, and that's good, but why not just apply it citywide and get it done?
Leave existing rules in place.
There needs to be more in here to protect existing houses. This criteria means basically all of inner SE portland.
No
if this overlay zone is so great, apply it to all of Portland! Trying to limit it to specific areas only increases complexity, which raises barriers to adding housing supply. Increased complexity will also limit incremental development by owner-occupiers.
The opportunity a zone should be more expansive
Apply the 'a' overlay to all R7, R5 and R2.5 properties in the map area east of NE 42nd to NE5X, between NE Killingsworth and the Portland Highway; and any R5 properties in that area created through land divisions of R10 or larger properties that currently have an R5 overlay.
1/4 mile is too much. See last statement. This covers most of the city. We have the 2035 plan that will develop the city centers. Let us develop the city centers then think about moving out. We need to keep space for families.
The 'a' overlay is too expansive. The 'a' overlay should be redrawn to create a zone between town centers, high frequency transit lines and MAX stations. That zone should be no more that 300' into neighborhoods. The new 'a' overlay should not consider parks or schools in the same way as town centers or high frequency transit lines.
see comment #9
no rip...give backyards back to the children
I support Item 6.
I do not support the new 'a' overlay zone as is proposed in the current format. I want the City to continue enforcing current safety and building codes for fire prevention and tree preservation.

1/4 of a mile is too far. Only include 1/8 mile from city centers. Not the others. This is covering too much of the city. We will not have residential family neighborhoods.
This all sounds like a way to overcrowd my neighborhood, while making rich developers even richer. Why not propose this initiative in historically richer neighborhoods where the lots are bigger??
No opinion
I'm against this and any overlay zone. This overlay unfairly burdens currently higher density areas while avoiding less dense and lower density zoned areas. Autonomous Vehicles in the future will make bus and Max service obsolete, particularly Max as it is a surface obstacle - not a benefit.
leaving this for someone more knowledgeable than I on this.
Do not change our zoning
Opposed. Maintain historical character of neighborhoods. SDUs are fine.
Agree
No thanks.
Yes delete current provisions. The new "a" would be broadly applied with these criteria which actually seems good.
It was only today that I learned about this project, so I hope you will still consider my comments. I understand the general concept, but I had a heck of a time finding the more detailed map which showed the proposed overlay on two areas which are an easy walk from my home of 36 years. Given your principles of trying to increase density close to services and already built-up areas, I don't see why you proposed two fairly small areas for increased density. The area from the SE corner of N.E. Siskiyou Street and 33rd Ave. NE extending two blocks east to NE 35th Avenue; and then south for one block along the west side of 35th Avenue NE to the north side of NE Morris Street; and then west two blocks to 33rd Avenue NE; then back north to the starting point (phew!) is overwhelmingly owner-occupied detached single-family homes. It isn't anywhere near the commercial and 4-5 story apartment complexes along NE Fremont Street or the very large complex at 33rd Avenue NE and NE Broadway Street. Similarly the proposed area just across 33rd Avenue NE along part of 32nd Place NE and 32nd Avenue NE south of NE Siskiyou Street and north of NE Stanton is filled with higher-end homes. Neither area is what I would call 'close' to your stated services. I just don't see where the two small areas, especially when contrasted to the much large areas throughout the city proposed for the new 'a' overlay, have all that much in common with them except for a Portland address. Where would there be room for a corner triplex? And without parking? That'll be problematical all around. It already is a problem near the complexes along NE Fremont Street. That's my two cents worth. I hope you will consider my comments.
I would like more comment or reasoning behind the particular exclusions to the 'a' overlay. I disagree with some of the exclusions.
I am generally supportive of the reasoning behind development near centers and corridors, but the 1/4 mile criteria is too crude as a standard and does not take into account variation neighborhood to neighborhood and street to street. There are a lot of assumptions in the criteria above that might be more convincing if there were good data that could be easily mapped or understood, in terms of human response to these criteria. For example, just because you live within 1/4 mile of 15min bus service, will you choose to ride the bus?
This seems like a bad idea. What about Solar? What about gardens? What about all the things that make a community a community? this will just cram more people into a smaller space.
Remove the current 'a' overlay. Allow all housing types, affordable housing bonuses, and incentives for historic preservation and adaptive reuse currently allowed in 'a' everywhere. Instead: o Create a transit or 't' overlay: In neighborhood areas that are a quarter mile or less from frequent bus service

as defined in the current parking code, or a half mile or less from high capacity transit, eliminate on-site parking requirements.1
whole city should be covered with A overlay
NO NO. You are ruining neighborhoods, and not planning increased open space/parks. This is not balanced growth and it's short sighted. NO.
I am very much in support of the broad application of the overlay zone. In order to reach the affordability goals, these housing opportunities must apply to a large swatch of the city. I appreciate staff efforts to eliminate areas (East Portland) where infill development is inadvisable and to draw in additional inner Eastside areas where greater density is advantageous. Our public transportation system will work better when there is a broader pattern of density throughout the inner city neighborhoods. In addition these areas are well served by schools, parks, hospitals, etc. and can support managed population growth.
See earlier comment. I do not believe people are really going to start totally commuting by bike! or bus given the service.
Yes Yes Yes Yes
You need to do a better job of this - this overlay is including place that really are not close enough in, and do not have enough services and parking and transportation to double or triple the people. NOT a good idea.
Do not do this. Do not rezone R5 to R2.5 in Corcordia neighborhood between NE 33rd and NE. 36th and Killingsworth and Wilshire Park. We cannot handle all the new people and cars and traffic. It will reduce solar production. Trees.
Delete or severely reduce the a overlay. The City's aging infrastructure cannot handle doubling the number of units.
i disagree with anything that changes the residential characteristics of our residential neighborhoods, so therefore oppose developing a new overlay anywhere in residential neighborhoods. a democratic vote in many of our neighborhoods i believe would agree. the treatment of mental illness is medical, the treatment of alcohol and drug addiction is medical---cheap housing is not treatment, and destroying the fine bones of many of our strongest east side neighborhoods is like the old pogo comic---" we have met the enemy, and it is us"
This new overlay has the effect of completely rezoning some neighborhoods while leaving others untouched. Also, "proximity to amenities" seems to be evaluated very subjectively.
no. project needs a 6 month delay.
Sounds great. YES!
This is far too wide-reaching, particularly on the corridors front. It should be reduced to being applied to the distance of a standard block off corridors at the most. Effectively rezoning a vast swath of residential areas that are not right off commercial corridors is too much change for neighborhoods to have to shoulder.
We should expand this overlay zone to encourage ADUs more broadly.
I generally like the overlay. I am not so sure about the zone subtracted from it in areas like Cully, East Portland, St Johns and Portsmouth. I think that uses a punitive measure vs an incentive (stick, not carrot) that will impact low income homeowners. We DO need to protect our renters. Are there other ways to do that? Let's not make this a renter vs owner conversation either.
Just allow the density everywhere. Single family zoning originated in racist exclusion (cf the Color of Law). Portland has had enough of that. Let's blow it up.
Please do not do this. This increased density miles and miles from the job centers of Beaverton/Hillsboro, Tualatin/Wilsonville and Vancouver will destroy the livability of Portland. The

new residents need to drive to their suburban jobs, so even if there is transit near by, they are not going to use it.
Density is good.
I'd suggest that this overlay is too limited in scope and should be extended to 1/3 mile, or a leisurely 5 minute walk to those defining foci.
These housing types should be allowed by right Citywide, not restricted to an overlay zone. Again, we should be planning for the next 50 years and the housing demand that climate change (and political?) refugees will create. Omitting areas threatened with displacement robs owners there the opportunity to create more, smaller housing, which will in turn rob renters of that rental opportunity. If equity is the intention, limiting housing choice to the (a) overlay zone does not clearly serve this purpose, but rather it is at risk of doing just the opposite. The City should not presume to be able to coerce the market to avoid displacement through such zoning. For example, ADU developers have already started business in the City and could be of service in providing ADU's to low-income homeowners to allow them to increase the value of their property in a way that increases supply to the rental housing market, without necessarily displacing current renters.
There has been insufficient study of the potential impact on neighborhoods from the proposed 'a' overlay zone provisions. To the extent that any 'a' overlay zone is to be implemented it should be a "test" zone of limited geographic scope that would allow the City to study (for a period of perhaps 5 years) the impact of the proposed larger zone.
I am opposed to increasing the density in already-dense neighborhoods. Inner SE has already borne the brunt of development, resulting in a decrease in neighborhood livability. This proposal would effectively apply to all of Inner SE.
Please increase the 'a' overlay in areas with low levels of vulnerable populations at risk of displacement. Make rich areas denser; don't just reduce development in poor areas.
No comment.
This will destroy neighborhoods and put burdens on the existing homes in areas of development. This will further exacerbate the traffic problem and clog neighborhood streets with "condo/apt/cottage communitie" 's parked cars due to lack of required parking. The artificial inflation of the real estate market will drive landlords to sell the smaller affordable homes o developers to tear down and build unaffordable rentals/home. Being close to mass transit does not equate to using mass transit. Since our mass transit hasn't improved and is more unafordable as ever, how does it make since to stand in the rain waiting for a late bus that kinda doesn't take you where you need to go, with zeta ability to transport food/goods back home?
Increasing regulations is not the answer to increasing activity, increasing incentive for activity. They add confusion, cost and eliminates the little guy from our city. I don't want to be consistently negative here, I just don't believe restricting development with new, cumbersome regulations without really studying ALL the impacts is a huge mistake. Once the existing vacant residential lots are built on... they're gone. I think we really need to be smart and maximize the potential for each lot vs restricting their potential is wrong and harmful and goes against the objectives of what the city is trying to or should be trying to accomplish.
No.
Agree
Not sure on this? Most larger sites are east of 102nd Ave. the is most logical area to promote smart development of sites and make changes to encourage additional amenities to become more available like grocery stores, transit access, businesses bringing more jobs need to be encouraged in these areas.
A overlay is wrong. Truth in zoning it's not ok to allow spot zoning

The quarter of a mile range from centers, bus corridors, MAX stations, inner ring districts, and higher opportunity housing areas functionally blankets the entire inner east side with this new "opportunity" zone. I am opposed to this broad of an expansion as while it certainly makes sense to make some accommodation very near transit corridors and thoroughfares, this proposal is disingenuously using that good argument to affect change across most of the city. All that such a change would lead to is a further gold rush of greedy re-developers who gobble up older quality homes (frequently taking advantage of the elderly and financially desperate), demolish them, and construct poorly-built homes with as cheap materials as possible. People are drawn to Portland's neighborhoods; destroying them will not make the city more livable.

It would be better to limit the new 'a' overlay to areas closer than 1/4 mile to transit corridors and centers. As proposed, the 'a' overlay will have the effect of incentivizing developers to buy older, smaller homes that are often the only "affordable" homes available. As is already happening, these houses are likely to be demolished and replaced with multiple small homes that are much more expensive than the house originally on the site.

As I mentioned above, I think the 'a' overlay zone should be everywhere. That said, if you are going to prioritize certain areas, I think those that you have outlined are generally good. The main priority should be increasing affordable options in high opportunity areas. I do, however, question why it is limited to 1/4 mile from MAX stations, as 1/2 mile from light rail is generally the standard for being close to transit. I am curious about the reasons for reducing the 'a' overlay in areas with vulnerable populations at risk of displacement, as it seems like this overlay zone could help those neighborhoods retain affordable housing options for those people.

-The proposed area for the new 'a' overlay is too large and treats all the neighborhoods within it as homogeneous, ignoring their specific built characteristics, history, population and environmental/natural characteristics. It indiscriminately covers virtually the entire east side of the city, except for the eastern outer areas. It unfairly burdens east side neighborhoods, while most of the wealthier west side remains exempt from the additional burdens caused by "across-the-board" increased density and the drastic physical changes that will occur to the built environment. -It incentivizes demolition of existing, smaller scale, viable houses in order to build multiple units, which will not only destroy the individual character of the neighborhoods, but it will also result in higher cost housing since new construction is much more expensive than retaining an existing building. - Since most individuals cannot afford to develop a lot with multiple units, most of the development will be done by developers and investors. This will result in less homeownership by local citizens, not more, and it will benefit developers and investors, many of whom will not be local. -"15-minute" bus service is misleading and only refers to "peak times." This view of transportation needs is obsolete. Fewer people are working traditional M-F, 8-5 hours in offices downtown, but bus schedules do not currently provide adequate schedules during times outside of rush hour. Additionally, the peak service buses are those that go downtown, not to other parts of the city that are quickly developing with businesses. Increasing density indiscriminately all over the east side without increasing transit service and other infrastructure will create worse traffic and congestion and make it more difficult for people to get around. -It is well documented that the city does not currently have enough police officers, and faces a significant challenge to building an adequately sized police force. Indiscriminately increasing density without also increasing public safety resources is dangerous and puts citizens at risk.

This is just plain lazy, scatter gun policy development. A bunch of new "centers" were created around any area that has the smallest commercial presence. There has been for many years maps of "centers" in the City. Revert to those historically defined "centers" for the purpose of this project. Limit the "a" overlay to areas within 300 feet of current TriMet frequent service lines so that there is a real relationship of efficient and reliable transit availability for persons who reside in these new

housing models. I don't have faith in the future abilities to expand or remove overlays by some undefined entity. Let's establish the parameters NOW.
What a joke. You protect the west side just because they don't have as much public transportation. Sacrificed their neighborhoods if you dare. But you wont. They have more money
All or none. All of Portland needs to sacrifice so all the new residents have affordable housing choices. They should also have some more duplexes and triplexes with views of Mt Hood don't you think? We should be thinking of their needs don't you think?
Agree
My beef with this one in 97213 is the "15-minute bus service" proviso, which I don't think tells the whole story. Bus service on the 12, while technically every 15 minutes, also is very busy and slow during commute hours due to Sandy being SOV-centric. If at that frequency the 12 also provided predictable _travel time_, it could probably stand more bus-oriented housing units being built on its route. As it is, raising the usage on the 12 like 15% is going to push it over the line into "uncomfortably full". I'd feel better about this plan if it came along with promises of improved transit priority on Sandy, and some kind of roadmap towards residential parking permits for homeowners in 'a' overlay. If we're to add density around transit lines, it should be done in lockstep with improvements to said lines that can absorb it.
I think this proposal really stinks. You people have density of the brain!!!! A 1/4 mile radius is going to create a 1/2 mile swath of higher density residential in areas that historically were single family. You will destroy neighborhood character. You encourage the demolition of older historic homes just so shyster developers and investment companies can put up skinny houses on smaller lot areas and sell them at an increasingly inflated market value. Whatever happened to comprehensive planning? You're increasing density to SFR areas but are you fixing and upgrading the streets and other infrastructure? Are you adding more neighborhood parks to support the density? Are you dealing with traffic and parking capacity issues? Are you providing for a variety of housing types for a variety of income levels? If the answer to any of these is "no", then I think you are in violation of the State Planning Goals and both Metro and LCDC should put a stop to this. Concentric circle planning should have been a part of the Portland Plan process, not an add on to accommodate an irresponsible and/or incomplete housing needs analysis.
Apply the overlay zone to EVERY SINGLE SQUARE FOOT IN PORTLAND'S CITY BOUNDARIES, but prioritizes the next few years within the "a" overlay zone proposed, as building there will help incrementally with an overall better city design and density. The boundaries where you say "at risk of displacement" are absurd. To limit the FAR, unit count and further building in a neighborhood will only increase the cost of land, and thus the risk of displacement. Do not insult the general public with the phrase "at risk of displacement" when the draft proposed obviously would contribute to all the classic elements that create displacement: **higher land cost **limited amount of housing units **increase profitability for national/international property management firms at the cost of affordability to the small-time landlord PLEASE increase the 'a' overlay zone over these areas. It's the least we can do to create more housing and density, especially in Cully and St Johns where the amount of lots that could be developed, especially narrow lots, is ginormous.
Very bad planning. One size fits all planning.
Concerning 33.405.040 Ineligible Sites & Step 3: Constraints. It is good that you recognized certain lots/streets should be exempt. However a dead end street that does not meet Fire Code or the Right-of-Way Code should also be exempt. Streets without adequate fire apparatus turnaround and/or do not meet provisions found in 33.654.110.B:2 pertaining to dead end streets and 33.654.120.C:3 pertaining to turnarounds on dead end streets should be considered ineligible sites. This is basic public safety. Dead End streets are always treated differently in the code because they could trap

people in the event of a fire or gas explosion. If the street does not meet code standards for dead end streets, more people should not be added to create evacuation issues during public safety events.

**7. Provide incentives for affordable housing and historic preservation (new 'a' overlay zone).**

- **Allow one bonus unit if all units are affordable (up to 80 percent of median family income).**
- **Promote preservation of historic resources when adding units through incentives such as waived parking requirements, additional FAR and flexibility in housing types.**

The 'how' of preserving historic resources when adding units needs to be spelled out. Is it only through internal conversions?
No. That does not address any of the root causes.
Waived parking will mean parking on the street which is a danger and will make developers have free license to put housing in places regardless of traffic, safe routes to school and other matter.
Yes please!
Yes I agree with these provisions. In general rather than mandates and requirements, things should be incentivized with additional units/FAR/sq ft allowed.
I do not think that sacrificing the historical lots to save an "historical" house is worth the downside of ruining the historical site.
If this is proposing that developers will be allowed not to create parking for the houses they build, then NO, not a good idea. This simply results in on-street parking in front of other people's homes and making streets less safe and neighborhoods less walkable. Especially vis a vis "historic preservation," it's not going to look that historic if a bunch of new cars are parked out front.
More infill with no contribution to infrastructure. Why aren't developers paying for these costs. Wait, we can continue to pass on the costs to current homeowners. This kind of waiver really isn't necessary for popular "higher opportunity housing areas". Those areas will be developed just fine without fee breaks.
I'm concerned about allowing additional FAR for historic resources unless the existing structure is not in compliance with the proposed rules (i.e., the historic structure could remain even if it exceeded new, more restrictive FAR). If, however, limited historic preservation would occur (e.g., significant tear-down), then additional FAR should not be allowed.
Are there also property tax waivers that are leading to excessive savings for large investors? If that savings cuts deeply into city taxes the residents are left paying administration expenses. Be very careful considering long term impacts on commonwealth equitable decisions like this example.
This proposal does little to address affordability.
Contractors are only concerned with profits. This statute is a cop out with regards to the real issues. Pricing motivated development. Without proper rent controls, the cost of rents will continue to rise at an unnatural rate.
The city has a poor track record in monitoring, understanding and, most importantly, fostering 'affordability.' No regulation should be put in place by the city regarding 'affordability'.
Lower from 80 to 30%
I personally think concerns with historic character are mostly a tool of nimbys. Having lived in England, I just don't think anything here is that old. But, if it's needed to get people on board, so be it.
Seems okay.
NO bonus units; NO WAIVED PARKING REQUIREMENTS

AGAINST This appears to favor investors not established local residents
Yes- this is a great move.
Waiving parking requirements and adding additional FAR will not promote preservation of historic resources because even if the structure is left standing, it's context will be ruined.
I can't say how this will eventually work out, but from what I've seen in terms of current and proposed construction, incentives appear to be an insufficient method for increasing affordable housing.
Do not waive parking requirements. Also one bonus unit and other incentives seem meager.
Yes
Bonus units shouldn't be offered to developers who make affordable dwellings. The city needs a comprehensive approach to affordable housing, not a throw-in offer. This is insufficient. Waived parking requirements shouldn't ever be used. While reducing cars should be a priority for transportation planning into the future. The lack of parking has caused huge problems in our neighborhoods. Our inner neighborhood streets are now used as pass through arteries for cars, and parking is a problem for people living in these areas. Not only that, but our inner city neighborhoods are now considerably more congested, resulting in measured increases in exhaust and pollution. This is not an answer folks, and is poorly thought through. Where is the innovative thinking and problem solving? I am deeply disappointed by our city's lack of leadership.
I grew up in a row home in Philadelphia. Everyone had the aspiration of moving into a single family home. This policy says those of less means belong in higher density housing. I'd rather see more lots be available for a tiny home enclave than this measure.
Agree with one bonus if ALL units REMAIN affordable for 99 years. Agree with preservation of historic resources, all incentives but waiving parking as it will not be sufficient between new multi-family and RIP proposal.
I strongly support incentives that allow historic preservation to occur consistent with the Secretary of the Interiors standards. I also support bonus credits for affordable housing, provided there is some sort of proximity limit or standards to address the concentration of units at the block level.
No- again a giveaway to developers to smush more ugly units into housing and get rid of garages/driveways
Waiving parking requirements for developers is turning a blind eye to the consequences. Study where renters with no parking put their cars and its impact on surrounding neighbors.
Yes please!
More incentives for preservation should be included such as property tax breaks.
Need to be more specific about the incentives.
Parking is a huge issue in Portland. We need more parking not less. Every unit should have at least one parking space minimum. Development in the area around N Mississippi st is a prime example of too many infills being approved without parking. It is difficult to even visit the area as parking is non-existent as is mass transit
Why? What goal is this change trying to achieve?
Unclear how "80 percent of median family income". As in, the price of the home needs to be ~55k? That seems like it would just never happen. Am I missing something?
Yes.
Yes!
No, I do not agree
No issue

Yes
skip this one because administrating bullet one will be a mess over time and bullet two is vague
Good luck with achieving affordability in this manner. It will never work.
No
Great!
support
100% is too burdensome. Even 25% would be higher than the IZ requirements. The bonus should be allowed with a single affordable unit. There should be no parking requirements at all in the overlay zone.
Incentives have not worked. Use zoning to require affordable housing development and create policy to require historic preservation standards. Increase permit fees to make demolition of affordable housing stock and historic resources less profitable in speculative development. Use increased permit fees to fund preservation of existing affordable homes by offering maintenance grants to qualifying homeowners through a new program.
No! It will not be affordable. It will promote developer profiteering and will destroy the neighborhoods!
Please stop waiving parking requirements. Some people are too old or too young to ride bikes. We are making this city only attractive to the 20-40 yr old cohort, and no-one else.
Disagree strongly!!!
Great! I think this should go farther, but thank you for including.
How about also incentivizing adaptave reuse of all existing homes that are deemed viable?
ALL new homes should be required to provide OFF-STREET parking for at lease ONE vehicle, better if required for TWO vehicles. There is no longer going to be any on-street parking if developers continue to be allowed to NOT provide off street parking for the residences they build. The current situation with multi-unit buildings built without any requirement for off-street parking is outrageous!
This seem like decent incentives, but it will be interesting to see what the uptake actually is.
ok
Yes. Increase affordability bonuses as much as possible.
approve of this.
-80% of median family is *not* "affordable" -"flexibility in housing types" must be more clearly defined
The affordability constraint seems far too strict.
Not sure anyone will take advantage of this 80% bonus unit. allow an extra unit if ANY 1 unit is 80%. that would get much more uptake, which should be the goal.
I agree but think the affordability bonus should top at at 60% MFI. Also, curious how the City is planning to regulate this? Does that mean LL's would actually have to let the City know what they charge for rent for these units? Would developers have to record a covenant restricting sale/resale price? I have lots of questions about this one, though I appreciate the intent. Regarding preservation of historic resources, does this only apply to listed historic resources (local, state, national)? Then what happens if a future owner removes their property from the City's list?
will affordable standards always be enforced? Don't waive on-site parking requirements till 50% of all cars are self driving.
Thank you.

Allowing one bonus unit: Do not agree. It seems like this would just lead to build a lot more studios or one bedroom apartments. I'm not sure this is what "families" need. Promote preservation of historic resources: Yes, provide incentives to developers that do not tear down historic homes.
Need more specifics -- would you actually require parking for 4-8 unit new buildings? How much?
it looks like this plan is neglects the lack of emergency services and I think it's irresponsible, even negligent, considering the safety issues we already face with the recent population increase.
Stop waiving parking! What is a "bonus unit"? Is that putting a fourplex on a corner, for example? If so, no thanks. Too crowded. People need a place to live, but also space. Also, we need to stop chopping down trees, they literally make our air.
Also promote preservation of historic resources and allow additional units, ADU's etc, by more flexibility to work with existing structures. We have run into prohibitive code and inspection requirements for creating attached ADU's for clients.
Please continue to keep SFR in R5 ZONES. Single ADU on a R lot acceptable.
do not waive parking requirements for anything with more than 3 units
Affordable units will have to be farther out from the city center, unless they fit the character of the neighborhood. I can't afford to buy a home in Georgetown in DC.
How often is the median family income revised? Under no circumstances should parking requirements be waived. Don't do a single thing to worsen parking.
No more than three living units per property anywhere. All housing units need off street parking.
These are both good directions, but we can do better and make these the basic requirements for additional units.
No additional FAR! Agree with encouraging preservation of existing structures.
Parking requirements should not be waived. It's not clear what historic resources are or how incentives are awarded.
Promote historic preservation. Allow interior rooms to be modified for rental on limited properties. Provide affordable housing in well designed multi-story structures in the downtown core, to maintain neighborhood character.
This plan does not in any way allow for the preservation of historic resources
I think any new building should be affordable. Do not allow the building of giant homes with or without ADUs in neighborhoods. I doubt that this incentive will get developers to build affordable.
80 of median family income is not affordable. Stop pretending you care about affordable housing. Stop with 'incentives' and start requiring it based on current need.
There are far better ways to address affordable housing issues than incentives to developers, especially when the definition of 'affordable' is 80% of MFI. Rent control, anti-speculation taxes etc.
80% of MFI is too high. Must be lower.
How does allowing greater height and such preserve historic resources? Doing so, necessarily requires substantial changes to existing structures. This seems like a placebo for those objecting to the destruction of existing structures rather than something truly designed to have an effect.
Yes, this makes sense.
Promoting historic preservation is a valuable goal and best accomplished by limiting the demolition of existing dwellings. Once the character of historic neighborhoods is compromised, the value of all homes and the appeal for new buyers decreases, affecting the property tax base that funds other benefits for the city. Old neighborhoods can never be "put back". The city should consider the potentially catastrophic impact of these changes before wholesale implementation.
Yes! Extremely critical to keep our neighborhoods vibrant, distinct, and thriving. Offer even more incentives for historic properties because they are the most cost effective affordable investment.

YES!
No overlays!
First bullet is great
We live in an Earthquake prone area and infrastructure is taxed beyond safe limits. Stop developing unless steps are taken to promote infrastructure development before infill.
No incentives. Mandates are needed. Don't violate zoning laws in order to squeeze in more rich people.
great
I'd love to see the bonus unit apply if just one unit is "affordable" up to 80% MFI. Getting the extra affordable housing is the goal, right? It's also probably the only way it works if this is designed to be a financial incentive to induce more affordable housing.
encouraging developers to build affordable housing is fine, but for god's sake don't eliminate parking!! have you walked through ANY street in the inner southeast lately? there are all these 30 and 40 and 50 unit buildings popping up with NO parking or just a few spaces. People drive, people own cars and need to park them. side streets are now filled all day long as people park to take a bus downtown and then they are filled all evening and night as people come home from work and have no place to park where they live. and more and more spots are being eliminated as the city puts in more of those water straining things, bikeshare stations, and allow restaurants to build decks in the street where cars used to be allowed to park.
Agree
Yes!
Allow as many affordable bonus units as the building can accommodate before breaking height and setback requirements (not just one) - Waive parking requirements for ALL properties - Promote preservation by cutting fees in addition to additional FAR and housing type flexibility
No, you leave out any level of detail about how this will be governed and stop with dangling no parking as an incentive, where do you think all these cars are going to go? What is your fantasy plan for that. So far the belief you have that people will abandon their cars has proven to be another portland city council lie
Mandate affordable housing. Build public housing. Guarantee the preservation of all existing structures. Prohibit demolitions.
It will depend on what the bonus is.
Contractors I've talked to have commented that the bureaucratic labyrinth that needs to be navigated to apply for and comply with affordable housing bonuses reduce the incentive to actually build affordable housing. How is this going to change with RIP?
Promote preservation of older beautiful neighborhoods that do not meet criteria required for 'historic preservation'.
more flexibility is needed in historic districts
"Waived parking requirements" is a huge issue in Rose City Park where streets are narrow and congested already.
I oppose. Add infrastructure and we can talk.
Your incentive is not even close to reasonable in bullet 1.
80% of median family income is not a realistic measure of affordability. A standard rule for lenders is that your monthly housing payment (principal, interest, taxes and insurance) should not take up more than 28 percent of your income before taxes. Even given that this is not the typical ratio in Portland, 80% is a joke and not meaningful in terms of creating truly affordable housing.
good

I agree that we need affordable housing in Portland, but at this point, rents are dropping due to the incredible number of apartments that have gone up, and continue to go up around town.
Require percentage of units to be affordable. Provide penalties for failure to comply.
Same as above-- what will be consequences be?
If you remove these restrictions from all lots, you won't need these incentives
Within limits I agree. But not far reaching and open without any neighborhood input
Yes
Yes
Keep zoning as it currently stand!
How exactly do you expect to measure "affordability" in single-family housing? A developer will just tell you they think it will sell for X, and then sell it for Y. I do not think this is realistic with for-profit single-family development.
historic preservation does not mean keeping unaffordable neighborhoods unaffordable.
"Up to" 80 percent of median family income implies that those earning 0-79% of median family income would also be able to afford it. Is this true? Or is it more likely that only those earning close to 80% of MFI would qualify?
Hate to see additional FAR. I know we need to provide incentives for affordable housing....I just don't know how to do it.
Yes!
Don't apply this to former corner churches and grocery stores.
Do not provide bonus for affordable housing
This seems reasonable.
Why is this written in complex jargon only City planners can understand? This seems like it's done to make sure you can push through your agenda. What are the implications of this? What does it mean in real life? How will it change the face and character of our neighborhood? Why did you designate only the areas with the cheapest and smallest homes? Why not encourage knocking down the giant homes on the ridge and replacing those with 4-plexes?
Good idea to have incentives. Waiving parking is not a good idea in a neighborhood with limited on-street parking. Reducing requirements makes more sense.
Agreed
Great.
Completely disagree.
You people have to stop waiving parking requirements. There are huge apartment complexes being built without parking and clearly you aren't living there because there are neighborhood wars about parking. Acting like cars don't exist doesn't address the problems. I like the idea of preserving houses when possible. And it's great to provide incentives for that. There are other ways than cramming in more housing. For example, you can start charging a hefty fee when existing homes are demolished (and it would have to be something like more than 50% demolished to keep them from saving a wall and saying they didn't do it). Affordable housing is encouraged. Again, that can be accomplished in many ways.
Not allowing for parking is a lousy plan. SE Portland is now inaccessible to people from other parts of the city who may need/want to shop or do business there because parking is a nightmare. It also creates difficulties for residents who don't have off-street parking and can 'defend' their driveways from being blocked.
Modify 1st bullet to allow a bonus unit if one unit is permanently affordable.

Sounds good
Additional incentives are required for historic resources. For new subdivisions or Planned Development is the bonus unit an ADU or single family home?
Do Not waive Any parking requirements. It's impossible to drive in some neighborhoods as it is with so many cars parked on both sides of the street. This is making Portland unlivable
I support these changes excepting those that apply to "historic resources" unless and until the city or the state takes appropriate steps to prevent neighborhoods from apply for recognition as historic districts with the National Park Service as a means of blocking any redevelopment or infill within their boundaries.
I approve of these bonuses, but think that, really, there should be no parking requirements in any single-family zones. Closer to arterials is where the on-street parking crunch is, and there is where the 500' from transit exclusion exists. Further away, there's no shortage of on-street parking.
I like this - good for discouraging gentrification.
This would be good if it included adequate design controls for the new housing.
First, our city needs to protect historic resources instead of "providing incentives" to keep them. It should be a requirement. It is an important part of our city. No, do not allow a bonus unit, do not allow additional FAR, and do not add whatever you're calling "flexibility" in housing types. I also do not think it at all reasonable to change "historic resources" by adding units and waiving parking requirements. I have lived in areas that have done that, and it is not a good change. "Historic resources" frequently have insufficient parking as it is. The city needs to start protecting and preserving its historic assets. I see no emphasis on that in this plan whatsoever.
ALL new high density housing should incorporate parking for the increased population clusters that will be created.
Yes. I support these changes.
Affordable housing - this language suggests rental properties. Neighborhoods with single family homeowners seek people to own versus rent. . Clarity and parameters defining what 'is affordable as a home buyer and home ownership' would be more informative than using MFI. Historic preservation - this may be subjective unless tied to State register. There are architecturally significant buildings and homes in neighborhoods that may not be qualified as historic, yet merit preservation as they represent a genre or period of development. How does the language intend to preserve the integrity of these collective 'spot infills' from 30 and 50 years ago?
How will affordability be tracked, and who will track it? Affordable for how long?
What if we see affordable housing units being built in places where a car is still the most convenient way to get around?
Why not allow a bonus unit if ANY units are affordable? If you really want to get more housing in the city, and want more affordable housing you need to incentivize people building MORE units. THE best strategy to achieve these goals would be to not restrict unit counts at all. Since you are already going to do that (against the goals you state you are trying to achieve) then you should give as many incentives as possible beyond the limits. If ANY unit is affordable then a developer or homeowner should get a bonus unit!
We already don't have enough parking. We should not be building 2-3 houses on a lot that only had one house. What is defined as historic? I believe that all houses that are 100+ years old should be restored to their original glory. This is what Portland prides itself on.
Absolutely not!!!! Waiving parking for large structures will force people to park in neighborhoods! Totally outrageous....no matter how much the city thinks we should do away with cars (feels that way) the reality is people will control to have and use cars... boo on this city

No.
Will this really protect homes on the Historic Resource Inventory? I don't know because I can find any additional information on your site. The Historic Resource Inventory needs to be updated and each house in the HRI needs to have a hearing when a developer applies for a demolition permit. That's how it was in the past and it needs to be implemented again.
why only in the "A" zone?
Do not waive any more parking requirements, you are putting undue pressure on these older neighborhoods. Historic preservation is dealt with in other codes, no need to duplicate here.
don't wave any parking requirements . Preserve the old houses they can never be made once you destroy them The neighborhoods are being destroyed way to fast with out thinking out what is being done .
False equivalencies here.
What about encouraging incentives for internal conversion of historic houses? Converting large houses into duplexes and triplexes makes sense. I loved the internal conversion report I read last fall. Why aren't you still discussing that? <a href="https://www.portlandoregon.gov/bps/article/594797">https://www.portlandoregon.gov/bps/article/594797</a>
agree
no affordable but less expensive...lets be real here.
ALL units of all the new infill duplexes/triplexes must be affordable to 80% MFI! Developers should only get a bonus ADU if all units re affordable to 60% MFI! I AGREE with historic building protections! The most affordable and most sustainable building is the one already built.
support
i like incentivizing affordable housing - it should come with a time term. not sure about historic preservation...unless maybe it is already in an historic overlay?
More bones units should be allowed. I support voluntary affordability bonuses up to 1.0 FAR for R5 and R7 and 1.5 FAR for R2.5. Anything less is a completely inadequate response to the affordable housing crisis.
So let me see if if I understand this correctly. Developers of large 20+ buildings are only required to make 10 to 20% of the building affordable to low income people. But small developers or regular homeowners who don't have the benefit of offsetting low rents with market rents, will be forced to make all units affordable in order to add density? How well do you think this will pan out? Do you think people will be rushing to build units at a cost of \$2/sf when rents can only be \$1/sf? And who would regulate this? Would the city need to hire staff to check up on property owners to make sure they are renting to low income folks? What would be the consequence if they rented their unit at market, or if the low income renter wasn't actually low income? Why would any owner want to subject themselves to that kind of bureaucracy, expense, and relinquishment of control over their property? If you want to encourage density, simply allow it. Just allow more density. Stop limiting people. People will build more housing if you allow it. Allow it.
I support bullet 1. I support promoting historic preservation via internal conversions and possible additional FAR not waiving parking requirements.
Waived parking requirements are a death knell to the livability of the inner city. Despite our successful public transit system, it is not feasible to expect
Contractors don't listen any how. Rebuilding is also a craft,.....!!!!!!!
Please waive parking requirements for all housing developments. Parking requirements increase housing costs and work against Portland's goals for housing affordability, safe transportation choices, and climate change mitigation.

We do not support this type of neighborhood engineering. We support market-driven development of neighborhoods. Social engineering to force integration most often creates negative consequences, as recognized from the several-decades-old experiment of forced school integration.
"Affordable" designation is too high at upto 80% of median family income. Base it on Social security income or state disability income and upto 2-3x above that. More historic preservation incentive is needed.
Consider a tax break for conserving homes built before 1920
HOLD THE DEVELOPERS FEET TO THE FIRE ON ALL THE NEW APARTMENT BUILDINGS AROUND TOWN. WHY ARE SINGLE FAMILY HOMEOWNERS ON THE EAST SIDE OF THE CITY BULLIED AND CALLED NIMBY. PEOPLE ARE ANGRY, HURT AND FEEL MARGINALIZED BY THIS PROCESS. IT REEKS OF CORRUPTION.
Trying to house people in existing backyards is not a solution to a housing shortage. There needs to be more focus on filling empty spaces in Washington and Clackamas counties instead of trying to pack as many people as possible into the Portland city limits.
we need to make affordable housing happen with any means possible. Not sure about the parking requirements issue. I can't see how you could get much more "developer friendly" than the essentially "no or little parking required" if near transit. Stupid code in my opinion. Even people who take the bus will often need cars, emergencies, family errands, children to school, etc. HATE that you are overrunning our neighborhoods with "newcomers" with cars. Add that to the commuters who park in our neighborhood already leaving zero daytime parking, it's absolutely absurd how you allow this.
no
Yes, and do even more.
build real affordable housing...portland boasts that, but doesn't do it for the most vulnerable..seniors/disabled..you build market rate housing and displace thousands
7. Why should this be more onerous of a requirement than for 20+ unit multifamily, where site acquisition costs can be spread across so many more units? One bonus unit should be given for one affordable unit, two bonus units if one unit is for families under 60% AMI. Portland's current parking requirements outside of areas served by frequent transit is ridiculous. No SFH should be required to have off-street parking as the driveway pre-empts at least one on-street public parking space. If the home has an adjacent alley, a garage should be allowed but not required on the alley.
I am opposed to 'a' overlay zone. See comment above.
This one is also difficult to understand
the city is ruining old neighborhoods and should be doing more to preserving the character of old neighborhoods
Allow bonus unit only if it doesn't involve a significant change to the lot/housing ratio. Yes to preserving historic resources!
Do not create new overlay zones.
Parking needs to be included when adding housing.
Adequate underground parking should be required for all multiple-housing structures. Currently city streets are clogged with parked cars, creating danger for pedestrians, bikes, and cars attempting to traverse clogged streets.
This kind of thinking is destroying livability! Giving incentives to builders to build more units on less land and to allow them to build without enough parking is vile! Look what is happening to Westmoreland and Sellwood! Your decisions regarding parking have changed our quality of life. We'd

like to shop and dine local, but can never find parking. You assume that everyone can ride a bike or walk to their destination. This isn't possible for many of us.
Historic preservation should be vital to all policy makers and city planners. It's what makes Portland special. Affordability is a complicated issue and tearing down beautiful old homes has done absolutely NOTHING to make homes more affordable. On the contrary!
Sounds good, but what does it really mean?
Agree with first bullet if way of calculating affordability is reasonable. Preservation of historic features and structures should be more of a requirement than encouragement.
Require affordable housing. Do not incentivize profits for doing what should be mandatory city policy.
Waived parking requirements???? Are you crazy? We are already seeing apartment buildings with limited parking in neighborhoods of single family homes, and the result is that there is now NOWHERE to park.
This reduces livability and historic resources
Historical neighborhoods should have very, very little flexibility in housing types.
This is just AWFUL. Who thought this one up? NO! Do NOT allow a "bonus unit" but DO REQUIRE preservation of historic resources.
No waived parking requirements. No phony "preservation." No mixed bag of housing types in establish single-family neighborhoods.
Good
Why should this be more onerous of a requirement than for 20+ unit multifamily, where site acquisition can be spread across so many more units? One bonus unit should be given for one affordable unit, two bonus units if one is for families under 60% AMI.
"Historic resources" = bourgeois aesthetics. Don't give rich folks special rights.
Is the Housing Bureau really interested in administering a sing affordable unit? Why would a builder or homeowner want the risk of complying with the Affordable Housing requirements fo 99 years? The risk tail is out of scale.
waiving parking always good = hopefully ultimately helps to encourage improved mass transit (which is environmentally more sound than single occupancy vehicles. Incentives for affordable housing = good!
Sounds good.
Let's get this city to be world class before thirty years elapse and thousands more children grow up in poverty: allow five bonus units if all units are permanently affordable units.
I support both of the proposed amendments.
YES. This is great.
Promote through incentives not demands or legal requirement
This is paramount.
We are preserving decrepit no architectural significance buildings that are unsafe. We are being held hostage by the white middle class values of mediocrity of white bread culture.
This allows density for bogus reasons. NO!
Yes! Consider a third in the R2.5 zones with 3rd at 60% MFI?
Allow TWO bonus units Give all the waivers needed to add possible missing middle additions of housing units
How is the city going to enforce the affordable housing clause over any time with as many housing units as are possible. The historic language is bad policy. A 100 year old craftsman in poor condition isn't historic.

Good.
this seems like a good proposal, but it does add another layer of complexity. It means that only larger developers with the resources to navigate the complexity will build these.
Waive some of the stupid regulation and fees from the City of Portland. One fee and one shop. I've read an article from the Oregonian about paying over 42,000\$ in fees and multiple copies of plans for different agencies. Stream line and digital the plans program.
ok with this but think we need more incentive for affordable housing in this neighborhood.
need to adjust definition of "affordable" to apply to bonus awards. affordable should be redefined as 50-60% of MFI. short term rentals should actively be discouraged. simply raising tax rates and ensuring adequate enforcement will provide incentive to property owners to choose to use their property for long term rentals.
Generally agree that if a bonus unit is given all units must be affordable. Agree with the preservation of historic resources through incentives.
As long as measures are taken to do everything possible to preserve existing residential structures, then allowing a home to have 2 ADU's- one internal and one external is fine. Same with allowing for internal conversions to create duplexes or triplexes. Without sound protections for existing housing built into this provision, this essentially up zones the entire overlay, and up zoning increases land value, but not structure value. Increased land values result in more demolitions of sound, affordable structures to be replaced with expensive units. So as long this provision only applies to existing homes being retained, then this will hopefully increase density in an organic way. If the result of this overlay is increased demolitions, then it's like unleashing a trojan horse. So yes, providing incentives for affordable housing and historic preservation is a given.
We should not be up-zoning large areas. That will only further inflate land prices and reduce affordability. We should be encouraging retention of affordable houses, internal conversions of existing houses to multi-unit houses; more ADUs within existing properties.
Should provide additional incentives for building to a green standard. Big missed opportunity otherwise
Don't waive parking requirements! All that does is congest on-street parking, which makes the city more unliveable. Get the cars off the streets and into driveways.
Yes.
I support efforts to preserve historic homes if they are in good condition and able to be remodeled without constraints.
"One bonus unit" does not sound like enough. Why not two?
Historic preservation is important.
Yes!
Parking is one of the primary issues with this entire plan. Although most properties are within a 1/4 mile of transit, not all remain within a reasonable distance of services, thus requiring vehicles for expedience. Roseway, in particular, would suffer from increased street parking on already narrow and/or unimproved roads which also lack sidewalks and presents a public safety issue. Significant infrastructure is lacking to allow the traffic proposed.
Allow internal conversion of existing houses into multiple units in all areas, and provide additional incentives for housing preservation.
<ul style="list-style-type: none"> <li>• Adding housing without requiring adequate additional off-street parking to areas that already have narrow, poorly maintained streets that lack sidewalks will increase the risk of human-automobile interactions.</li> <li>• Expecting that the additional population will not own, park, or drive cars is unrealistic.</li> </ul>

<ul style="list-style-type: none"> <li>• Expecting that the additional population will increase ridership on public transportation without adding sidewalks on the roads leading to the bus stop is unrealistic.</li> </ul>
We dont need incentives for affordable housing, we need requirements.
Great idea. Could there be a further increase allowing one more small internal ADU for 60% MFI?
Good
#1 and #2
Please waive parking requirements and allow additional FAR and flexibility in housing types for ALL new residential development, without special incentives for historic preservation.
This affordable housing "bonus unit" point is laughable because developers don't want to build affordable housing since it brings in fewer dollars at market. One bonus unit is not going to be the carrot to guarantee developers will suddenly race to do the "right thing" in the eyes of city planners and housing advocates. 80 percent of median family income is unrealistic because most people looking for affordable housing are much below this percentage anyway. Promoting preservation of historic resources--I'm assuming that you mean renovating the few existing structures in Portland that City Hall deems worthy of retaining, like old apartment blocks. Parking requirements are routinely waived for new construction (as in the 10-story building in my neighborhood with 90 units and 20 parking spaces) so this is no incentive, either. The new proposal does nothing to encourage the saving of the old with developers who would rather demolish and build new.
Nope to both of these. They smell like incentives sure to be abused by the developers who've already raked hundreds (maybe thousands) of homes into the landfill. Ask for creativity and quality, and you just might get it—especially if you make it harder to do teardown construction just to put up a particleboard palace out of a plan book.
How about just demanding respect for our city instead of bending over for these profiteering criminals? Who's in charge here? Why not try doing your job of protecting the citizenry?
This makes sense when you are talking if multiple housing units such as apartments. Not with houses. Waived parking won't work, people have cars and mass transit isn't always a viable option.
Do not destroy historic preservation with the excuse of "affordable" housing.
It seems like too high a threshold to require all units to be affordable to the up to 80% crowd. Reduce this to at least two, and more private developers would participate in this program.
Why not apply this to all new infill housing? After all, infill actually preserves and strengthens neighborhoods, as presumably preservation and affordability do, too.
There needs to be more to encourage preservation and penalizing destroying old homes.
NO
This bonus will likely not be sufficient to incentivize affordable units in most cases. The opportunity cost and cost to build are too high. Instead try offering a bonus unit if the bonus unit is affordable. This creates a strong incentive for affordable units and more housing supply instead of a difficult tradeoff.
Only one bonus unit sounds stingy--why limit the number of affordable units that can be put on a given piece of land to +1 of the total number of planned units? Who is that going to sway?
This is a great idea!
Needs more expansion
Allowing bonus units takes away the historic preservation idea. Bonus units are just a give away to developers.
Incentives for affordable housing should not include allowing bonus units. I have little confidence that the City will be able to make homeowners keep their units affordable once the construction of those

units is completed. Additionally, preservation of historic resources should not be accomplished through lack of regard for parking requirements or increased building mass.
see comment #9
build real affordable housing in the existing vacant lots, and offer them to poc who moved to gresham
I strongly support Item 7.
I disagree with adding a "bonus unit" in any instance. We also request that property owners next to lots with proposed "tiny homes" / ADUs be consulted and give consent prior to anything added by an adjacent property owner. Having multiple homes/ADUs wedged into already-small lots (50 x 100 or less) can create unlivable conditions for people on BOTH sides of a fence.
Do not allow bonus units for anything. they do not preserve historic resources.
"Affordable housing" sounds a lot like cheap homes for poor people.
No opinion
You really think people are going to build and rent their units at lower than 'market value'? Waiving parking requirements and adding FAR, combined with the Narrow Lots will violate the "Scale of Houses" goals. The City and this process can not be trusted.
need more info than this to comment. One bonus unit per how many other units? Is this for apartments or single family homes?
Do not change our zoning
Stop waiving parking requirements. Tenants need parking.
Agree. Parking requirements especially counter the goals to increase density and, one hopes, affordability
Nope. We need better jobs, not more affordable housing.
YES
See my comment above re parking in the two smaller areas extending east and west from 33rd Avenue NE. It is already a problem for those of us on NE Klickitat Street when there are visitors to the properties on the 3100 block of 33rd Avenue NE. I have had my driveway blocked several times, and you propose additional residences/residents and no parking for them.
I think the preservation aspect might get abused for developer gain to avoid parking and add more area. I think it needs very clear, intentional guidelines, historic review, or something similar as much as I hate the process.
80% of household income is not affordable One unit per development is useless and laughable- this is absurd, and a slap in the face to our city's exploding homeless situation, and virtual absence of housing affordable to working people of lower, and lower middle incomes.
Unless there are sale price caps placed on the new "affordable" housing, market pressures will continue to push sale prices up.
No opinion, though these both seem reasonable.
Yeah you know nothing is affordable downtown, right? My family lives in SE. a tiny lot was sold (the woman was moving into assisted care, she got a little for the property) and they promptly tore down the house and built a triplex, three levels. It's destroying the neighborhood.
This is nice, but seems unfeasible. WHY not allow a bonus with SOME affordable units, not all? Absolutely I support waiving parking requirements, in fact, get rid of parking requirements all together.
not sufficient bonuses for historical preservation
I support these proposals.

How will preservation really be promoted since most of the plan actually discourages this. I really don't get this one. There's nothing in it that encourages preservation to my eye.
Isn't an additional unit an incentive enough? Why does it have to be affordable to the below median family income?
We respectfully request that parking requirements consider the needs of people who use wheelchairs or have other mobility concerns. While we recognize there are a great many beautiful and historic neighborhoods in Portland, we are concerned that waivers for new units where parking is scarce could make those units inaccessible due to the likelihood of needing to park a considerable distance from the destination.
Again, too many units in places that don't have room. Also waiving parking requirements is a terrible idea.
Why impact the historic properties in the first place? So counterintuitive. The Portland that everyone loves is disappearing and will look like every suburban California city in the country. So short-sighted.
Tear downs are not resulting in affordable housing, rather the opposite. Don't let developers play some she'll game, then not be held accountable.
i strongly disagree with both of these. historic preservation means what it says. an historic neighborhood should be preserved. affordable housing has nothing to do with historic preservation per se-----build high rise housing in the inner east side, and on the westside---not in our established residential neighborhoods.
Up to 80% of median family income is not "affordable". The 80% rule means that a family at 80% of median income should spend no more than 30% of their income on housing, not 100% of it.
project needs a 6 month delay.
No incentives necessary. Simply adding the bonus unit is enough.
I support the affordability measure. I don't support waiving parking requirements unless the regulations also prohibit the resident of the new unit from owning a car, which I believe would be illegal.
Do even more to incentivise affordable housing.
Yes, I agree!
Yes. Drop all parking requirements everywhere. Cars are death traps. Why subsidize them? Instead, let people park diagonally on wide neighborhood streets.
Waving parking requirements does not create affordable housing. Waving parking requirements creates ugly car-lined streets for blocks away from the new building. Established residents lose the parking spot in front of their house so someone with a suburban job can live in an expensive apartment. We are going to have to change the veterinary clinic we take out cats to because all the parking around the clinic is now being used by the new residents of expensive no-parking apartments.
Not necessary.
The RIP will not result in homes affordable to most people. • By limiting the proposed areas of higher density (the "opportunity area") to well-established, i.e., "complete neighborhoods," which come with associated high house and land prices, developers will not be able to build homes affordable to most people in these areas. • The city needs to make infrastructure investments, including transportation improvements, in all parts of the city. With this infrastructure in place, lower land prices in many areas will allow for additional housing. Grocery stores, restaurants, and other services will develop with the influx of new residents. This will help create new, additional "complete neighborhoods." • Very little analysis of the impacts on neighborhoods has been done to support the proposed radical change in zoning. The city needs to do the analysis and share the analysis with the public.

I'm concerned that historic preservation will be used liberally in a non-productive way to save unremarkable housing filled with lead paint, lacking insulation, and built atop a crumbling foundation that will buckle in the next earthquake. I do believe the incentives such as waived parking and additional FAR should be extended to many more housing types.
A bonus unit should be allowed if 1 family-sized (2 bedroom minimum) affordable unit is provided. Requiring all units to be affordable will be cost prohibitive and limit private/non-profit partnerships which could do more to integrate affordable and market-rate housing.
This rewards developers for doing what they ought to be doing anyway and the residents of the area pay the social cost in more parking problems and less livability!
It'd be nice to allow bonus units for developers who are building less than 100% affordable, maybe by allowing them to accumulate units from multiple sites.
No comment.
"Affordable" ... please define. How do you expect affordable housing when lot cost, permit cost are what they are and then you want to add more restrictive regulations? There is no way to build affordable housing in this city unless it is subsidized at this point in time.
Incentives? They should be requirements. If we truly have a "housing crisis", this is not optional, and requires a complementary relationship between public and private entities within the city. Historic resources should be maintained for what they are...historic resources. Once they are gone, there is no going back.
Disagree. We have gone overboard on the limits placed on homeowners in historic districts. However, proposal to waive parking requirements and other flexibility are good.
For the bonus unit based on affordability how long do you require all units to stay affordable? Sounds risky adding permanent housing based on a short term policy
Affordable is NOT market rate. Preserve existing neighborhoods development needs to be inline with character of neighborhoods. Allowing ADU's that are used as rental only we need to keep single family homes so families can have a starter home.
I would prefer even stronger incentives for preserving older and historic homes in our neighborhoods. Many of these homes are more modest and affordable than new housing units being built.
All good ideas! I am in favor of density bonuses for developers who provide affordable units. Parking should never be required, but waiving parking requirements and allowing FAR flexibility and housing type flexibility is a small price to pay for historic preservation.
"Historic resources" is a very specific term and very few existing intact houses meet this criterion, despite the rich and valuable character they may have. These incentives should be expanded to intact, quality existing housing stock, beyond just historic resources.
Any of these require the actual property owner, an actual person not a legal entity, to reside on the property for a minimum duration of six months each year. There needs to be a robust enforcement agency and penalties for failure to comply with the laws. No to bonuses. This aspect is ripe for exploitation by unscrupulous persons.
How are current historic district requirements addressed?
The market determines housing choices. Your incentives are wishful thinking and again is a gift to developers
I think "historic preservation" will be used as a tool to prevent modern structures from being built in my neighborhood which I'm against. I would like to see my neighborhood modernized as it will increase my property value.
Will encourage more demolitions not preserve our historic resources. The market drives housing types. You are dreaming if you think the market would follow your wishes.
Agree

Is that "bonus unit" in addition to the "new housing types" above? Like could one build a quad-plex on a corner?
And how is this affordability bonus going to be implemented? Do you know? What is affordable to some is not necessarily affordable to others, especially those on a fixed or very low (minimum wage) income. How will these people be accommodated? You people should be encouraging preservation of older homes so as to protect the integrity and character of our older neighborhoods. Redevelopment and gentrification are already destroying much of that character in many areas resulting in displacement of lower income residents and loss of livability. Waiving parking requirements is insane!!! Everytime another one of those ugly, blocky, Soviet style apartment buildings goes in along a transit street the adjacent neighborhoods see onstreet parking becoming harder and harder due to the ridiculous parking requirements now in place. A recent survey identified an average of 60% of apartment occupants on transit streets still owned vehicles. Guess where they park? On the neighborhood residential side streets, thanks to you. You should already be providing flexibility in housing types if you really want to comply with State Goal 10. Where are the courtyard and garden apartments? Where are the tiny home complexes? Where are the communal and shared living complexes? Where is the missing middle? As to incentives for affordable units, are you talking houses or rental units? Builders will build smaller and more cheaply furnished rental units as a means to provide affordable housing.
Allow 1-8 bonus units if they can be created like the old buildings (built prior to 1959's bastard year of zoning and building restrictions). We can create more units by recognizing the historical usages of lots in the past within the city of Portland, and recreating that. Sometimes demolishing a house and building one from scratch is the best way to help affordability for both renter and homeownership populations. I heartily recommend reaching out to Garlynn Woodsong of Woodsong Partners to hear his experience redeveloping a Dekum farmhouse into 4 units. The costs he experienced were ENORMOUS
Again, poor planning. My husband and I promote and use public transportation, but we also need a car at times. These outlying areas, such as Multnomah, are difficult without a car. The city is trying to force carlessness in areas where it's not appropriate
get homeless off street especially those displaced because of rent increases

**8. Encourage more cottage cluster development (all single-dwelling zones).**

- **Continue allowing multiple houses to be built on a site through a Planned Development Review, but allow an ADU to be built with each house.**
- **Require at least half of the units in a cottage cluster development to be oriented around a common open space.**
- **Reduce the procedure type for some Planned Developments from Type III to Type IIx.**

NO. Another way to ruin the town and give money to developers and then charge more in property taxes.
Again the common open spaces are being destroyed in the very area you are proposing to build in.
You can and should do more to facilitate a true cottage cluster code. This is a far cry from the original proposal.
Yes this is a great idea.
Cottage Clusters are just a new name for apartments. The common open space could be a sidewalk down the middle of the property. The houses would be 4 or more units together with the 2 1/2 story

back walls 5 feet from the neighbors house. The min yard space is a 12 x 12 yard. These will turn into rentals or just spaces for young no family housing. They will be 2 or more stories so older people will not want them and they will have so little yard that families would not want them.
I strongly disagree
Cottage clusters around a common open space can be a great idea. We've seen very attractive such places in the Cully neighborhood, for instance. It seems to us that this is something for which city planners should be specifically looking for targeted sites.
This section needs far more explanation.
This just mskes no sense. Please define the 'cottage' concept. I see this as another loop hole for contractors to gain a permit without holding their structures design to a very loose requirment.
Yes!!!
Seems okay.
NO COTTAGE CLUSTERS
AGAINST This is at the expense of existing neighborhoods and the residents living there
Yes. And I'd also recommend eliminating parking minimums.
As long as the current level of solar access and tree canopy can be maintained, this is okay.
We are overcrowding out our city.
Not a fan of cluster communities. They seem out of place, separated from the rest of neighborhoods. I'm sure you'll keep them in, tho, so requiring clustering around common space is ok.
Do not allow an ADU to be built with each house
Yes
No, no no. Cottage clusters are a way to turn single family zoned land into multifamily, using a loophole. This has been documented! Another handout to developers. This has been researched in Seattle, with the following findings: They are expensive to build, they don't attract families (so single residents live in them), and don't increase density. Further, do you really want to turn Portland into a New Urbanist development? They promote classism, racism, and planned development rather than bottom-up perspectives. Not the way forward for Portland.
sure
These are condos or in this case, commune condos. Call them what they are. Portland For Everyone does not respect most of the city.
10000 sq feet is too small for a cottage cluster
No reduction in procedure for clusters and add a cap of how many of these per neighborhood- would love to see some of these in lawyer rich neighborhoods of NW and SW
Good ideas.
This is great!
Design Reviews should be required for all cottage clusters.
Yes, yes, yes, more cottage clusters everywhere!
This is a great idea but they all need adequate parking.
Why? What goal is this change trying to achieve?
At least one unit should face the street.
Yes!
No, I do not agree
Agree with this item.
Yes

nix bullet two, leave design to developers
Not clear on what a Type II process is, but a rigorous process should be required.
No
Yes a million times yes!
Reduced Procedure type for PD's is good.
would like for cottage clusters to be allowed without PDR
Require any teardown/rebuild to increase the density. Require at least one ADU to be built with any new house and provide incentives for two to be built.
Do not allow cottage cluster development in single-dwelling zones on lots zoned for less than R10.
If greenspace is actually included this might be OK.
Bullet 2 is still design control, even though its a nice idea. Incentivize it instead of requiring it.
Disagree! The ADU's look ugly and do not match the neighborhood!!
Great
This is great.
All new housing should be REQUIRED to have off-street parking for all units built!
This is a very attractive housing type that is very rare in Portland, and should be an option for all large parcels in single-family residential zones, as the resulting urban form is substantially more attractive than the conventional disconnected faux-rowhouses built on many suitable sites.
ok
We need a true code for this that will encourage development.
I don't approve of having multiple houses on one site and instead favor one house limited in size on one site especially in the densely populated urban neighborhoods.
This is fantastic! I very much support this.
Please allow attached/row houses in cottage cluster developments, which typically further restrict floor area or height of each unit. Please make this easy enough that it will be taken advantage of, and that it won't be too hard for residents to have fee-simple ownership of their units.
good
I support encouraging more cottage cluster development and the addition of an ADU with each house, and I think it should be allowed outright without having to go through PD review, which is more costly and time consuming and likely would lead to a more expensive housing option. If several smaller structures can meet the base zone standards (setbacks, outdoor space, FAR, etc.) then let them be developed without a PD.
If cottage clusters are allowed, then ALL the units need to be oriented to the open space.
Same density concerns: Decreased green space. Insufficient infrastructure.
This seems to be a more appropriate model for residential zones on the outskirts of the city. I don't see how this is helping with housing density. This is a good model for maybe retirement cottages etc.
I don't understand what this means.
Very strongly support this.
How will it be encouraged?
it looks like this plan is neglects the lack of emergency services and I think it's irresponsible, even negligent, considering the safety issues we already face with the recent population increase. Please please please! Consider what you are doing here without any consideration for the already taxed EMS. Police and Fire bureaus!

This encourages noise (partying on the common lawn). With stricter noise ordinances to compensate, fine.
Absolutely agree. Cottage cluster development is a critical component to affordable housing and creating housing that will allow elderly populations segments to live in community. So important to quality of life.
These are all highly intrusive on adjacent neighbors.
Please continue to keep SFR in R5 ZONES. Single ADU on a R lot acceptable.
Yes to open space. People need gardens and open space. Please stop just cramming people into Inner SE.
Agreed.
Does each cottage come with a driveway, garage, and/or carport?
Should not be more than three living spaces per property, each with a parking space off the road.
Limit the number of dwellings on the lot. Don't allow tearing down homes to build multi ceilings. It's ruining the neighborhood.
I like PDs (hello Cully Grove).
Maintain current planning code for multiple housing proposals. Strive to maintain open space.
Support this
This is incentive to tear down and crowd lots with houses.
Lots of cars in a small space leads to travel nightmares
No, this should be limited, not encouraged.
Cully Grove-style developments could be great where small houses occupy huge lots, though I don't understand the provision for ADU's. "Cottage cluster" evokes the kind of lovely building Portland is in the process of demolishing, but what will be built is what pencils out for developers. Until residents have more control over aesthetics and quality of materials, I can't support this, even with the laudable requirement for common space. Type III to Type IIx seems to be aimed at limiting dissent.
Only with height limitations and some off-street parking.
Waverly Commons, which presumably is an example of this, has had a substantial negative impact on the surrounding neighborhood as it is treated by residents as a private, walled development with no effort to become involved with the previously very friendly, livable neighborhood.
Sounds good to me! My neighborhood association will most certainly write a letter against this, but I think it is a good idea. It will provide more allowances for tree and habitat preservation and make way for a diversity of housing types. I do think the environmental stipulations could be made to be stronger. I.e. all mature trees greater than 12 inches dba are to be preserved outright.
You cannot continue to permit multiple houses on a single site. Additional ADU for each house is also not permissible.
With ample space for trees and green infrastructure.
Support Cottage Cluster development; HOWEVER, greater standards are needed to be appropriate for broad single-dwelling zone applicability.
No
Cottage cluster idea great
No infill before safety
Create more flexibility in the size and arrangement of cottages. For example - four 1500 - 2000 SF homes should be allowed on a 10K lot.
Only where no demolitions are required.
yes

Great!
cottage clusters are a great idea AS LONG AS they don't ruin the feel of a neighborhood. you can change aspects of a neighborhood without ruining it but you have to be really really careful how you do it. I don't know what type III or type IIx is so can't comment.
Agree
Yes!
- Absolutely encourage more cottage cluster development, of both the single-story and multi-story (each building is a duplex/triplex) variety
I just read this article: <a href="https://medium.com/@pdx4all/cottage-clusters-portlands-chance-to-build-community-in-a-new-way-7c504c5b260b">https://medium.com/@pdx4all/cottage-clusters-portlands-chance-to-build-community-in-a-new-way-7c504c5b260b</a> I would like to see a full cottage zoning option as I am looking to move into such a community.
On the 3rd bullet absolutely not again what fantasy is this based on
Build more "cottage clusters" in as yet undeveloped areas within the UGB. But don't demolish existing homes and buildings to achieve them.
Strongly support cottage cluster development. They seem to blend in more with single family homes.
Are existing cottage clusters destined to be torn down so developers can build more expensive ones? Will neighbors have a say in which lots can be turned into cottage clusters? Do ordinary citizens have any kind of say in terms of what kind of development happens in their neighborhood.
Building ADUs with each additional house on tiny lots leads to less greenspace. Do not destroy traditional neighborhoods for experimental design.
I oppose. Add infrastructure and we can talk.
Great idea.
The Bureau must research resident parking and other impacts on neighborhood infrastructure and include practical mitigation for these impacts including the need to create parking spaces for each dwelling.
how does this pencil in comparrison to building out the maximum space? Wait - how can it by multi units if its in a single dwelling zone?
I don't understand any of this, but I know it applies to my neighborhood but not to inner Northeast or the southwest neighborhoods. Why is that? (Hint: it's not because it's fair.)
Sounds ok.
cottage clusters make sense in environmental overlay zones.
These need more guidelines. All units need to be centered around a central space
This is critical for an aging population!
No
Unsure the ADU bonus would be beneficial. Need clarity on the reasoning underlying the inclusion.
Keep zoning as it currently stand!
yay adu
Yes!!
Cottage cluster around open space promotes livability. People interact, it gives e of breathing room. I have concerns about parking. It seems with all the proposals there is no requirement for providing parking. Trying to force people to use public transportation does not work, from my experience in dense Berkeley, Calif.
Yes!
Require cottage questions to be oriented by an open space

This seems reasonable.
This is bullshit. This will create a miserable, overly-crowded neighborhood reflective of tenements of the past.
I think these cottage style housing units are okay. Sure
Cottage developments need to be oriented with spacing in mind. Open space is good, but use some of it if necessary to orient the dwellings in an
Depends on the space. If there's enough room to have an ADU, that's fine - but not if the ADU peers over the neighbor's fence.
Again concerned about setbacks in cases where development is not occurring on a corner lot.
Great
Completely disagree. Encourage density through multi-family apartments in high-density areas. Not neighborhoods.
I don't even understand this one.
Clusters could be helpful ONLY IF they are in keeping with the neighborhood character and preference is given for 1 or 1 1/2 storey homes designed for (older) people who need/want to downsize, need fewer steps, etc. but don't want to live in apartments.
No to ADU
Allow and encourage cottage cluster housing - attached and detached - in all zones. Encourage it with extra FAR.
I like the idea of the common open space, I believe that's very important.
Maintain the procedure for Planned Developments as Type III.
Are you considering parking for all of these extra dwellings?
I support these changes.
I support this.
I like this change as well, for population density purposes.
This will encourage more demolitions of historic buildings to be replaced by poorly designed housing because of inadequate design controls.
This is not a good idea at all to impose on all single-dwelling zones. It is incompatible with existing neighborhoods. I'm not opposed to cottage clusters in suburbs, but to allow it in current neighborhoods is tantamount to tearing down existing housing because developers can increase their revenues drastically by selling 15 "cottages" where 2 or 3 houses used to sit. Why do you hate existing neighborhoods? Leave them alone!
NO CLUSTER HOUSING!!!!!!!!!! Developers dream of coming into historic neighborhoods and creating small house clusters that have huge profits. The fabric of Portland's neighborhoods is not predicated on cluster housing and should not be for sale to the highest out of state bidder.
Yes. I support these changes.
Many successful examples of this within the City where the street facing buildings address the street with entries reflecting the 'across the street homes' and maintain the character of the street. The challenge with these is that they form 'mini neighborhoods' confusing navigation for fire and police vehicles. The mini-neighborhoods create a sense community with the residents within, but leave the remaining street facing single family homes out, detracting from the overall sense of community that 'front doors on the street' create.
What is Type III and Type IIx? What does that mean?
Don't make any design or layout requirements. If you want to incentivize these, remove restrictions, don't add new ones. Seriously, why should the city dictate how someone lays out a cottage cluster on

their privately owned land? Again, if you want more housing opportunity in Portland than you should be doing everything you can to remove barriers and restrictions to new housing being built. Most of the RIP is making it harder to build housing.
Allowing for single person housing will change the essence of the neighborhood that consists of single family homes, many with young children. Increased traffic and safety will also be a concern.
Again it will ruin the look of the older neighborhoods!!!
No. They belong in multi-family zones.
Approve of encourage more cottage cluster development.
Our neighbor just built an ADU which now towers up to my second story only 4 feet from my fence. We have less privacy now. Increasing the number of renters decreases the quality of a neighborhood. The charm of having neighborhoods where neighbors raise their families over years will be lost if you add density and renters. More turn over of neighbors due to renting decreases the quality of the neighborhood.
Another example of social programming, which typically fails. better to allow for these things to exist without stipulating they be done.
No new requirements are necessary and especially regarding open space
don't encourage anything more leave the neighborhoods alone . You are destroying Portland for ever .
Whatever.
Too much infill. Once again to much density in one location. This needs to be toned down.
agree. However, the most efficient cottage cluster with homes of 1200 square feet will each cost a minimum of \$380-\$400,000. Again affordable only to families making \$85K or more. Is this the demographic we are tying to house?
WTF? Use examples in context. I would like to see examples of the best and the worst execution within the parameters of the code. That way the average joe will know what you are talking about. Some builders will execute well thought out designs and others will take advantage of every loophole the code leaves to create buildings incongruous with the neighborhoods
I disagree with "cottage clusters" in all single family house zones. Try a pilot project first. All units should be affordable to 60% MFI.
support
yes to cottage clusters!!! it's more meaningful than ADUs if we are really trying to capture the missing middle and make a difference.
I support allowing cottage cluster development in all residential zoned areas
This is actually a good idea, as long as the main house of each house/ADU pair is allowed to be a comparable size to what would otherwise be allowed on individual lots. If houses in cottage clusters are limited to something like 1200sf, then the incentive to build them is vastly reduced. Also, most families demand/need more space than that. Cities can't force the market to want what it wants. So by severely limiting the allowable size of houses, you will push families out to other cities, and Portland will not benefit from children being raised here, setting down roots here, moving back here after college, and keeping the local economy relatively steady. I have no children, but children are imperative for the vitality of any community. Allow builders to build houses that families want to live in.
This should only be allowed where it is compatible with the context. In most of the R5/R7 zones in the city, these tightly space very small units are completely out of character. They are also inappropriate for families-many lower income households are those with children. This is also a very inefficient, expensive way to build housing units. The approach has been oversold with now analysis.
No opinion.

Nonononomo
Yes--thank you for these changes.
Yes, this sounds reasonable as long as lot size is appropriate to support the cluster, and setback space is respected.
Cottage clusters around a common space is a good addition. Neighborhood community is created in these spaces in Chicago.
NO. HORRIBLE IDEA.
All developments should follow procedural Type III
Portland does not have the empty space to fulfill this suggestion, but Washington and Clackamas counties do.
If a lot has a single house on it now with little available space to construct more homes unless existing open space, shrubs and trees were removed, I would not favor encouraging cottage clusters.
interesting idea, good concept
no
I am not a fan of cottage cluster developments. I'd rather live in a spacious well built condo with shared utility systems. Clusters shouldn't have to face a certain way, but they should compliment each other and their context.
ugh
I LOVE cottage clusters the way some developers like Eli Spevak are doing them. Give an additional density and FAR bonus for such developments, and reduce review time to a maximum of 45 days.
Cottage clusters should not be allowed in current single family residential areas. Develop them on undeveloped land.
Also hard to understand this one
too crowded of a proposal.
Allow ADU only if the cluster/ADU to lot ratio allows for trees and green space to same degree as single family housing above.
Do not encourage more cottage cluster development.
Not in historic districts
Not in historically significant areas like Eastmoreland. Use open space land for these cottage developments. Make sure each cottage cluster has adequate off-street parking.
Please do not give the developers more wiggle room. They build to fill their pocketbooks, not for long-term improvement of a neighborhood. The city should have input from neighborhood groups, not builders. After all, we're the people who saved our money to purchase our houses and we're the people who work to create a neighborhood that serves our families.
I am categorically opposed to this! They do not fit in with the historic nature of many of our neighborhoods and should not be allowed. STOP DESTROYING OUR NEIGHBORHOODS!!!!!!!!!!!!!!!!!!!!!!!!!!!!
Too complex to answer in a survey like this.
Generally supportive but difficult to fully grasp ramifications of this change.
Fewer ADUs.... maximum number of 3 per block, mandate that ADUs be rented below average rent, prevent ADUs from being rented via AirBnB. Mandate 30% MFI on any cluster developments for all new structures erected.
Not in all neighborhoods!
Cottage clusters are the best! I also LOVE rowhouses and hope to see thousands of them in Portland eventually.

If people liked living in common open spaces, developers would have created more of them. People want to have their own gardens, their own chickens and dogs and their own privacy.
Oh no you don't! Cottages? COTTAGES? And now add mini "cottages" onto the cluster of cottages? You guys are destroying existing neighborhoods. As I read further into this, it looks like you are trying to wipe out traditional existing neighborhoods and replace them with a bunch of minis. If you so strongly dislike Portland that you'd like to destroy its existing housing and replace it with your "vision", I invite you to move to an undeveloped part of Wyoming and do it there. Leave this city alone!
I very much like cluster developments but not in the middle of established single-family neighborhoods. Stop pushing the ADUs. I personally would put one in but crowding each lot with one is crazy.
Must have parking for every unit.
Give a density and FAR bonus for such developments, and reduce review time to a maximum of 45 days.
I like the sound of this.
If there is serious interest in cottage courts, why is the FAR so low?
Common open space with cottage units is psychologically healthy = good. ADU's with each house should be allowed.
Great.
Attached ADU only. Again, please go for the real GHG reductions. Don't let this opportunity pass the City by.
I do not know enough about cottage cluster development to make an informed opinion. However, I support all measures to densify Portland and allow more people affordable, diverse housing options close-in and close to amenities.
Yes, this sounds good. Though I don't totally get why cluster development should be required. This can be beautiful, but maybe someone else has another different good model?
ADU? the IIX. How smart you all are. How stupid must we be?
NO! STOP PROMOTING DENSITY!
Wonderful, especially the ADU allowance and Type IIX process. It is too expensive and cumbersome to do cottage clusters now. Perhaps a pathway for reduction in fees or process for affordable cottage clusters? (If all units were at 80% MFI max.) Consider a scale for fees based on project size.
4 houses on 1 lot reduces water ground water absorption- SW Portland can't handle this!
I like the idea of incentives for housing clusters, but the infrastructure in many neighborhoods is not built to support multiple units in a small footprint. Make sure this is also taken into consideration. I live on an unimproved street, which had housing on improved streets built on later. Our street, which was built and is maintained by the home owners, has suffered tremendously due to the increase in traffic, which must use our portion of the street to reach the new homes, This includes the initial construction vehicles and now delivery vehicles, etc. The cost to convert to an improved street is simply out of reach for the home owners, which include many on fixed incomes.
YES YES YES especially for both renter and co-ownership possibilities
Excellent idea
Yes
This seems like a good idea!
Seattle has this... I was a resident there for over 15 years and in my Central District neighborhood we had several of these....

ok with this
good goal outlined above.
Generally agree.
As long as cottage cluster development does not result in demolitions of existing sound and affordable housing, then cottage cluster developments are great. The problem with this idea though is there are very few vacant parcels of land within the city that are large enough to accommodate a cottage cluster.
I think cottage cluster development is OK. It should be around a central courtyard. To me, a "Cottage" is the same as a large ADU so the ADU provisions don't seem to apply.
Are there guidelines in code regarding FAR, number of units, orientation of buildings and lot sizes for the cottage cluster concept? If not there should be. It seem to me that an ADU should not be automatically approved without some guidelines.
Yes!!
Yes!
Create a true cottage cluster code that will encourage the development of smaller, more affordable homes.
<ul style="list-style-type: none"> <li>• In the long run, the estimated tax base will decrease, not increase, due to the devalued property values.</li> <li>• The increased requirement for utilities and infrastructure maintenance as a result of the increased population will also significantly impact any estimated tax revenue.</li> <li>• A more sensible approach would be to limit the number of multifamily dwellings per some area of land, for example, no more than 2 or 3 duplexes per block of single-family dwellings, and no more than 1 triplex per block of single-family dwellings.</li> </ul>
Cottage clusters are the least efficient building typology for our housing crisis. If we cant maintain the people & lifestyle of our city, the "cute factor" will mean very little. No matter how cute the cottage, if it rents for \$10000 a month to a tech mogul, it stops being cute.
Definitely maximize this potential. Apply incentives for this model in areas where land utilization is low and existing structures need more love. Require affordability to allow higher density clusters and allow for two-level duplex arrangements within clusters. Encourage land-trust model for land ownership to encourage true community, use of shared amenities and garages, and ensure long term affordability.
Good
#2
Please do not require units in a cottage cluster development to be oriented around a common open space.
Cottage Clusters have never been popular in Portland and require too much land to build on. Developers using the other RIP guidelines will instead just build multilevel structures with the highest density levels in their place. Cottage clusters also take away more street parking than single-family detached homes and the regulations are more difficult to fulfill. In a developer's mind, open space is wasted space and money lost.
These are just apartment/condo complexes, right? So no way on all. With 12 x 12 as the only green space, I imagine they are crammed into the lot after all else is razed to make way. Consider urban canopy, open space for physical and mental health, once vaunted "complete neighborhoods." These are things we're losing just to help one industry make a pile. How about trying a few of these on vacant land only and in a pilot program? Right now the kind of developer plying Portland generally does not care about impacts and long-term viability of their projects. It shows.
More inhabitable basement/bunker space. No more demolition.

Allowing multiple houses on a lot where 1 house exists currently only devalues the existing house values. What is being built is not affordable to the median population in portland
Only when the neighborhood already contains clusters. They do NOT belong in single family neighborhoods.
Create a cottage cluster code please! Cottage clusters should be encouraged and easier for developers to build. Doing so would lower to cost to develop them and thereby increase their affordability and quantity.
Not clear to me how this happens. And it ought to apply, again, citywide and in all residential zones. For example, why are we encouraging 50x50 lots in stead of 25x100 lots in small lot zones? Can't you be more specific if you really want this to happen? Seems overly timid.
NO
This makes more sense, although the orientation rule seems arbitrary. Light is often an issue in the NW, so it makes sense to orient units for maximum sunshine, rather than enclosing them around a common area.
This is going in the right direction. Cottage clusters can be a beautiful part of a complete neighborhood and we should be removing all barriers to these in all areas.
Change the wording of point #2 to require a common open space, but not designate the unit orientation ("around").
Cottage clusters are just another name for apartments that are jammed onto a lot for the most development that you can have. They will eat up the green space that Portland is famous for. Large lots now have large gardens, yards and trees. Cottage clusters are just a way to cram more houses on the lots.
no rip
I support Item 8, strongly support bullets 1 and 2.
No to multiple houses per lot. Yes to allowing one ADU of adequate size (at least 500 square feet) to be built with new homes of 1,000 square feet or more. Please note this this should not be a requirement of building a new home. In the past, I would have supported the idea of a common open space, but the City of Portland is allowing common open spaces to be used as camp sites, which then become dangerous due to presence of needles and human excrement. The City no longer has my trust, and it is difficult to support new ideas, when there seems to be such disrespect and disdain for most homeowners / renters, business owners, etc., by city leaders, (i.e., Chloe Eudaley, et al).
Cottage clusters are just another name for apartment buildings. Do not let them into the neighborhoods. The common open space is just a walkway to the mass of condo type housing. Make the procedures harder for them to build.
Will we get additional police enforcement in such neighborhoods? Sounds dubious to me, and a sure-fire way to lower my property value. I am absolutely against it.
Absolutely agree.
I am against. These cluster developments, combined with incentives, and the Narrow Lots, will Violate the "Scale of Houses" goals and lead to unnecessary lawsuits.
This sounds fine to me, except for the last point of which I know nothing and it is not explained.
Good
Do not change our zoning
Opposed. Maintain historical character of neighborhoods.
Agree
God no. Communes went out of style in the 70s.

More could be done to encourage planned developments. I would like to see allowances for even greater density and make the procedure less onerous.
YES
Sounds great.
Only if there is a minimum of one off street parking space per dwelling. Density is being pushed at a level far exceeding the infrastructure of our close in neighborhoods.
I support this flexible approach to cluster housing.
Please don't.
YES and also: Draw on cluster codes successfully implemented in other places <sup>2</sup> with key features like reduced home sizes, homes oriented toward shared courtyards, and parking located toward the periphery (if any). ○ Allow, by right, cottage cluster developments that meet these rules. ○ Allow a subdivision approach for cottage clusters to enable fee-simple ownership. ○ Give a density bonus in exchange for the provision of more, smaller homes. ○ Allow a second ADU per home in exchange for a visitability requirement, consistent with staff's proposal for the 'a' overlay.
keep Type 3
I can't believe this is something the community would need in any way. Please consider the effects for the families with these dwellings in proximity to families.
I support these proposals.
Really, again, you people haven't thought this true in terms of what it really do to the city and its neighborhoods. An ADU with EACH house. Good Lord.
Nope
too many multiple units in areas that don't fit that style
No.
Do not allow multiple houses on current R5 lots. Who decided Portland must accommodate anyone who wants to live here? Ask current residents what they value and their vision for neighborhoods.
i disagree with all of these
Cottage clusters should be required to be affordable.
project needs a 6 month delay.
How would cottage development affect sewage flow vs large multifamily complex? Would one be more or less impactful than the other?
I don't have an opinion on the first two points, but I am against reducing any regulations related to development. It seems the difference between IIx and III is that a hearing is held in III but not IIx. I don't want to stop holding hearings for any developments that already require them. In-person public comment is important.
Yes. Does this include courtyard apartments? It should.
I like the idea of cottage clusters, esp on higher traffic neighborhood streets.
Yes. Please expand cottage cluster allowances
A large percentage, of not most ADU's are on short-term vacation rental websites such as Airbnb. That needs to be made illegal if the point of ADU's is to create affordable housing. All new housing needs to be small, affordable, with parking and no vacation rentals allowed.
Density
Yes, more of this.
A true cottage cluster code should be provided with a few clear prescriptive requirements. More, smaller dwelling units should be allowed within a similar FAR what would typically be allowed. There is significant market demand for cottage clusters and serious zoning limitations to their

<p>implementation. By not creating a true cottage cluster code BPS is causing undue constraint and missing a serious opportunity to further their mission. As an architect-builder of two cottage cluster developments in Portland (over the course of 5 years). It is clear to me that many more people would develop such housing if they were allowed through a clear specific zoning process, not a PUD. Further, the City should consider ways to make it easier to subdivide ADUs from their parent homes to lower the threshold to homeownership. We live in a time of small households size and we need to give these households more homeownership opportunity for small housing that meets their needs and which they can afford.</p>
<p>The cottage cluster scenario needs more development. Single story, no basement (ie true cottage cluster) and examination in the unit mix that makes for a better living scenario.</p>
<p>Sounds good.</p>
<p>No comment.</p>
<p>This stupid term "cottage community" is a deception. 3 story condos with no parking is not a cottage community! That is deceptive development jargon. 3 stories is not a cottage, 2 stories is not a cottage!</p>
<p>Yes for ADU's. I'm not familiar with cluster housing so I shouldn't comment on this. "Require" at least half of the units in a cottage cluster dev to be oriented around a common open space? How does mandating design of this nature increase the affordability of a project or house? What are the cities goals? Make things harder, more expensive and cumbersome for builders? Drive builders out of Portland? How many clusters have been built since the 1990's? Was the use of the land it's best and highest use?</p>
<p>Do not reduce planned development procedures. No extra ADU'S built with each house. Where is affordability requirements in cottage clusters?</p>
<p>Strongly agree</p>
<p>This is probably ok</p>
<p>We have enough land to meet the developers needs but they need to build new infrastructure to support the new People coming to Portland. It's time to start making sure it's safe for kids to walk in a neighborhood on busy streets.</p>
<p>I like the idea of cottage cluster housing as a means to increase density, although they do lack a certain closeness/orientation to the street. Requiring that units be oriented towards a common open space is a good compromise, and reducing the procedure type to expedite it is a good thing. Ultimately, I'm in favor of anything that adds density, but it seems reasonable to require that all units either be oriented towards the street or a common open space.</p>
<p>You will recall the "cottage motels" from the 1930's; 40's;50's along main highways. Some still exist. This proposed aspect will infiltrate neighborhoods with that kind of long undesired type of structures. In the past this type of structure was adjacent to main highways, roads etc.. That is the proper place for this type of development. Keep it in that environment, not in the heart of single family neighborhoods.</p>
<p>Start on the west side given the lots are generally larger than the Eastside. Spread the density around but you won't because you are such good planners.</p>
<p>lots are 5,000 sq feet. How about the westside with larger lots. Start there please.</p>
<p>Agree</p>
<p>+1 I love cottage clusters.</p>
<p>I'm all for this, but in single family zones? Why are you shoving density into single family zones? A cottage cluster would seem to be more appropriate in moderate to medium density zones. Remember your concentric ring theory of zoning? Don't reduce processes to where they prevent due</p>

process from occurring for surrounding residents. There's too much bureaucracy and lack of transparency involved with the City of Portland as is. Yes, require common or central open spaces for clusters. Take a look at the small cluster development at SE 41st and SE Division. How about promoting more of these. Why are you pushing ADU's so much? I'm really getting the impression Portland planning is trying to convert Portland into a giant ant farm. Well, I'm not an ant and I need both private and open space. Density without variation does nothing except to limit where people can live and create stress because of how confining the environment is.
WE NEED MORE OF THESE IN EVERY SINGLE QUADRANT. Reduce the procedure type to the smallest possible so these affordable, dense housing models can be recreated at a blinding pace for a gentle density opportunity.
This sounds good for certain areas, but not in all neighborhoods. Do this on streets like Barbur Blvd. and Beaverton Hillsdale highway. Adequate public transportation along those streets needs to go with it.
small homes or a cluster?

**9. Rezone some historically narrow lots from R5 to R2.5.**

- **In the 'a' overlay, rezone historically narrow lots that have the highest access to amenities from R5 to R2.5.**
- **For the remaining historically narrow lots zoned R5 citywide, do not allow development unless the lot meets the minimum dimension standards for the R5 zone – 3,000 square feet and 36 feet wide.**

Oppose--due to unease with housing opportunity zone concept noted above; complexity; and odds that these changes would boost rather than curb demolitions.
Where are these amenities?
Yes this is good to promote more density and affordability.
expand 'a' overlay citywide (really, remove the 'a' overlay and allow the 'a' options everywhere)
This would turn many areas into renter land. I live in the Cully neighborhood and there is a large tract between Sandy blvd and Fremont and 62ed to 82 that would be turned into one large apartment complex.
I agree
It's unclear to us if the diagrams are actually showing the maximum amount of development to be allowed under each scenario (i.e., if so, then why are there different types of treatments on different lots?). But in principle, these strategies seem OK. The main issue to us, as stated in earlier responses, is the absolute sizes of newly constructed homes -- they are too large and too unaffordable. As a result, the amount of house-to-yard ratio in the R2.5 diagram looks very high and the block too dense. We can't say we'd want to live on that block.
Are these for stand-alone narrow lots now? If so, fine. If, however, this would allow creation of narrow lots from current larger (e.g., 7500 sq. ft. lots), then I oppose this proposal.
How will this affect my property?
Don't know enough about this issue to comment.
NO DEVELOPMENT ON NARROW LOTS
The city really needs to be able to go to the home /lot and see if it makes sense. and The only way is to actually see it. Many need /could be developed ,makes no sense in comparison to the adjacent neighbors ,

FOR
The advisability of rezoning narrow lots from R5 to R2.5 depends on the neighborhood context. If the neighborhood is already that dense, go ahead. If not, don't do it.
Historically, I thought our lots were 50 X 100.
Yes
Would increase congestion, parking, limit access and redesign identity of existing neighborhoods.
NO, R5 lots shouldn't be rezoned as noted above, they should remain as-is.
seems reasonable, but not super knowledgeable on this topic.
Outrageous upramp of destruction of neighborhoods in inner N, SE and NE neighborhoods. Absolutely ridiculous giveaway to developers. No NO NO!
Please justify how the Reed neighborhood was allowed to be R7 zoning and Eastmoreland wasn't. Then ask realtors how they'll be able to sell in neighborhoods that used to be beautiful and distinct but now look like every other place due to your cookie cutter city planning.
Good ideas.
Why not allow development of these lots?? If a house can be built on it, then the city should let a house be built on it.
Disagree heartily with rezoning without citizen vote.
This is fine
I support this infill houses are getting too narrow
Why? What goal is this change trying to achieve?
Yes.
No, Narrow lots do no enhance the neighborhood
Agree. These are already being built on anyway and will help promote attached housing which has better appeal, versus current methods of single skinny houses next to other styles of housing.
Good
Assume you know what your doing but why increase the ability to add units on a too skinny lot?
No
Too many anti development rules. Let people build places to live of all sorts of sizes on all sorts of lot sizes. Safety should be your only concern. Otherwise just stay out of the way and let people build things.
Rezone is good. Unbuilt on 25'w lots should be allowed to do a LOT CON and build one detached unit, even in R-5. See page 30 of Vol. 1. Thge guy on the very left side should be able to LOT CON and build or sell his lot & keep his house. Are detached houses still allowed on corner lots in R-5? See #3 (R-5 proposed), pg 30.
support
Eliminate the loophole that allows historic underlying lot lines to be utilized for lot divisions. This is the single largest factor in degrading quality of life in established neighborhoods.
DISAGREE!!! 36 feet is ridiculous! Spaghetti people live in those skinny hones!
Don't limit development on narrow lots so much. Research shows these can be some of the most affordable houses out there. Embrace them!
This will appease many opposed to the aesthetics of "skinny" houses.
Good.
do not approve.
Do not rezone R5 to R2.5

Please rezone all these properties to R2.5, everywhere in the city.
fine
I support this, though it really feels like spot zoning and in some areas doesn't make a lot of sense spatially. R-2.5 should be a transition from higher density to lower density, but some areas being proposed for upzoning are surrounded by R-5. And other areas that will remain R-5 are directly adjacent to commercially zoned properties (for example the proposal to rezone to R-2.5 in Concordia north to Ainsworth but not rezone south of Alberta makes not a lot of sense.) We own a vacant historic narrow lot of record in Concordia and want to continue to retain our ability to develop it so I support this proposal, even though it doesn't make sense for the reasons I noted from a broader planning perspective. I would also support not rezoning to R-2.5 and keeping provisions that allow stand-alone vacant narrow lots less than 36 feet wide to be developed if adjacent lots are already developed or in separate ownership [33.110.260.C.1.a.(1) & (2)]. These provisions should also be applied to historically narrow lots that would remain in R-5 and are less than 36 feet wide.
This is ok, but we really need to narrow the 'a' overlay down a lot.
Again very concerned about the a overlay. My close-to-amenities neighborhood is beseiged by crime and busy losing its appealing character.
This change will negatively impact homeowners in these zones.
Ok.
Historic lot lines are irrelevant today. This seems like just a gimmick to increase density.
Please continue to keep SFR in R5 ZONES. Single ADU on a R lot acceptable.
I don't know what this means. But keep trees. Keep gardens. Keep some space between neighbors. If at all possible. Keep the beautiful dream of Portland alive in the inner SE.
I disagree - these narrow lots should be permitted development, but they should not be allowed off-street parking.
Sorry, this is too technical for a lay person to comment on. Please, eliminate jargon when communicating with the public.
25 foot wide lots is too small, no R5 to R2.5.
Underlying lot provisions definitely confuse a lot of people and I think holding the line on minimum lot dimensions makes sense. That said, I think we risk overly bifurcating the differences between R5 and R2.5. If you look at the relative locations of these zones citywide, there are an awful lot of R5 lots in close-in affluent/gentrifying neighborhoods with great infrastructure and non-conforming density. Why treat Laurelhurst so different than North Tabor? While you have a reasonable approach here, I think that leaving out more widespread base zone changes in the Comp Plan was a huge missed opportunity to right the inversion of Portland's residential zoning (more multi-family in East, more single-dwelling in inner SE--WHAT?!) I think we should just define better minimum lot standards for R2.5 as well, establish a clear nexus between those standards and the standards of housing we want to see, and hold the line from there with regards to underlying platted lots. Early 20th century developers drawing up plats didn't have any special insights, and while we have to stick with state law regarding these underlying lots, we have the right to define standards for what is buildable. We can establish a more predictable and understandable path forward for R2.5.
Absolutely opposed to this
I am not in favor of rezoning historically narrow lots from R5 to R2.5. Again, why is the SE unfairly impacted.
Do not rezone R5 zones to R2.5.
This destroys current neighborhoods and incentivises the tear down of existing homes to build more units on a lot by developers.

Stop recognizing historic lots of record that don't match surrounding neighborhood lot size. If city council members lived in the east side neighborhoods, they would not be allowing this to happen. Standard lot size should be 5000 square ft.
The city should not use underlying lot lines to re-zone.
This is terrible. Existing zoning should be preserved. Zoning changes should happen through the comp plan process. This work around is unconscionable. The city should limit opening the underlying lot lines as it destroys the character of whole blocks.
R2.5 is ridiculously small for the size of the houses going on these lots. Such houses should be lower and set further back so to at least appear somewhat proportionate.
Bullet point one: Yes. Bullet point two: Why. I think this is arbitrary and there are plenty of examples of housing on narrower lots which is quite successful.
Opposed. This will lead to inappropriate development.
Not sure of the language here. Some examples would help. My concerns are keeping neighborhoods character intact and allowing people to keep green spaces in their yards.
NO!!!!
yes
Narrow lots are concerns for safety, i.e. fire hazard.
No! Stop the upzoning.... it's just a handout to profit reaping developers.
No need to limit development on narrow lots if housing can reasonably be built there. But, you can apply design standards so that the homes on narrow lots aren't crap.
I don't like monkeying around with lot size but I think there is some room for some change. but if a neighborhood is nearly all 50x100 lots and you want to cut them in half, that's a bad idea. I don't know enough about this proposal to comment intelligently.
Agree
Rezone R5 lots to R1, or require redevelopment as "cottage cluster" lot (ditch R2.5 entirely)
So this is where the economic discrimination comes in. Your application of the overlays to only the east side is discriminatory and will result in a class action lawsuit - already being planned. That having been said where is the money to increase the carry capacity of the water and sewer systems to support increased capacity? Where are bonds for roadwork required to increase capacity. Where is the money for schools that will see increase in class size. And finally we have no law enforcement over here in the east side, where are you going to find that money. Dont think you will get that from increased taxes and if the taxes are not earmarked for the overlay districts you know it will be funneled to support the mansions on the west side as we have seen consistently from the city council, hereby renamed the west side council
Maintain ALL R5 zoning as R5 zoning. Period.
Again do the citizens in the neighborhood in which this is happening have a say in terms of the proposed changes? Does the city of Portland value property rights at all?
I support this.
I oppose. You are encouraging development en masse on larger lots and negating the option of smaller development options on narrow lots. Foolish.
great idea
There's a ton of incomprehensible jargon here, but I'm opposed to all of the eastside of Portland being rezoned to allow multiple dwellings. I want Eastmoreland to remain single dwellings or one house with an ADU on minimum size lots that reflect the current situation. It's wrong to do this to the whole eastside.

OK.
I don't see the logic of requiring big lots anywhere; that will just restrict the number of homes we can build
narrow houses are so ugly. Avoid anything that lets them be developed please.
Agreed
Keep zoning as it currently stand!
My question here is what are you using to define "lots." For example, my house is situated on one tax lot. However, the City has elected to recognize the "historic" platting on which my house straddles two lots. These two lots never actually existed in reality... the only house ever built was built based on the currently recognized lot lines. But, I could turn my lot into two lots with very little effort and be the possessor of two (2) newly created lots. If you are continuing to recognize the historic plats then I would have to disagree with this one.
Excellent idea. Why didn't anyone think of this earlier.
Nope. Just no.
OK.
Do not rezone R5 lots
I'm not sure I agree with the restrictions on the rest of R5, but I think this is a step in the right direction.
Again, this is not explaining anything. Why are you pushing this through?
Agree
Okay, as long as you're not packing housing in to abut the neighbor's back (or side) yard.
I'm all for greater density.
great
disagree.
Require onsite parking for all houses.
Allow housing on all 25 ft + narrow lots in all SF zones, unless there is an environmental constraint.
I don't know what the difference between the zones is.
Do not require narrow lots to be rezoned from R5 to R2.5 Allow narrow lots to be built on if greater than 30 feet wide. Require all unbuildable lots to be turned into Open Space or Parks.
No rezoning of R-5 to R-2.5 unless same criteria applied to all neighborhoods on the west side of the river and the existing homeowner does not agree. If bought into R-5 zoning, this isn't what the homeowner bought into.
I support these changes.
I agree with this, and support it, including the two segments in the Richmond neighborhood, between Hawthorne and Division, and between Chavez and 50th.
I like and agree with this change, and would actually encourage you to think about expanding this. I checked on the rezoning in Mt. Scott-Arleta area, and it seems that a subset of the newly rezoned area will not be rezoned from R5 to R2.5, when I believe that it should be for population density purposes.
This will encourage demolition of existing housing and construction of poorly design new housing because of adequate design controls. Skinny houses on narrow lots are inherently inappropriate in neighborhoods with 50' wide lots. They should be abolished. In predominanlty R5 zones which may allow R2.5 densities, only duplexes which look like single family houses should be allowed.
I'm strongly opposed to rezoning R5 to R2.5. The narrow lots are narrow enough. On the other hand, I'm also opposed to disallowing development on pre-existing R5 lots that are less than 36' wide for

CURRENT owners of the property. Basically, I oppose this entire section and would like to point out that you are rendering some lots worthless through the stroke of a pen. If you were a current owner of a narrow R5 lot, you would have just lost all opportunity to develop your land. That is wrong.
NO demolition of our historic neighborhoods. Go build out new housing along the fringes of Portland's boundaries.
Do not rezone from R5 to R2.5
Yes. I support these changes.
Introduce new zone R3 for these 3000 sf 36 feet wide lots. This simplifies and removes confusion since the R5 = 5000 sf with 50 ft frontage and R2.5 = 2500 sf lot with 25 ft frontage
Didn't we just spend 4 years looking at the zoning lot by lot? Why are you disregarding Council direction to stop increasing density on historically narrow lots?
all narrow lots should be developable in all neighborhoods. All rules should be applied evenly across all neighborhoods and all single family zones.
Will radically change neighborhoods for the worst. Destroy there desirability and charm.
Allowing for single 1or 2 person housing will change the essence of the neighborhood that consists of single family homes, many with young children. Increased traffic and safety will also be a concern.
Yes.
You know damn well those 2,500 sq. ft historic lots were never intended to be built on unless paired with another 2,500 sq. ft lot. This was a loophole found by developers that you are going to continue to let them exploit.
Is there any room in back? Where will children play?
Agree with #1, disagree with #2
No further restrictions are necessary, these infill lots are important to the development within the MSA, and we should be encouraging the development to the fullest extent.
do not allow development if it means remove an old house . Protect what is left of our once great neighborhoods .The old houses are what make a neighborhood a neighborhood and not a ghetto .
No!
Strongly disagree! This is not fair! This will allow too many structures in certain "pockets" of our community, The R5 to R2.5 zones will be congested, a mix of multiple designs and will reduce livability and current property values for established homeowners. In addition it may create years of ongoing tear downs and construction once again negatively impacting livability. Finally, I have to ask "what amenities" and how many years will it take to implement the supposed services. This does not make sense as far as allowing more density in specific pockets.
disagree. These historical lots are early developers attempt to sell additional lots. They had nothing to do with zoning. Instead of a wholesale rezoning of these lots, neighborhood associations should be involved with the approval of this rezoning. Since it is the neighbors who bought into the character of a particular area and who continue to invest in their community, their preference in rezoning should over-ride a planner sitting at a computer.
I disagree with rezoning R5 to R2.5. No to development on historically narrow lots in R5 zones!
support
no
I strongly support rezoning all residential lots to R2.5.
Not allowing development on narrow lots is a disastrous idea. It's also completely arbitrary based on one councilwoman's personal aesthetic taste. Why is Portland allowing itself to be governed like this? While I don't think skinny houses are particularly beautiful in general, there are ways to design them well, and they fill a desperately needed niche in Portland's housing stock, allowing families to buy

houses when they otherwise may not be able to afford them. If Portland has a housing crisis, why do we want to prohibit building houses where building houses has been allowed all along? Why would we intentionally choose to limit housing opportunities to Portlanders?
No. They were zoned as is for a reason.
NO-NO NO NO NO NONONONO
This is fine!
NO. This will bring back McMansions and single family houses. Too many historic homes have been destroyed and greedy developers will not currently build fewer units because the zoning prevents them from overbuilding.
No
no comment
No - rezoning from R5 to R2.5 will eliminate any open space between homes. We need to be able to breathe, for heavens sake, and the trees, shrubs and other greenery create oxygen for us all that houses crammed together prevents us from having.
no
No thanks. let there be a garden instead.
no upzoning....bring back yards for children and adults/disabled
9. From Appendix F: "Benefits include additional housing opportunities, including fee-simple and potentially lower cost homeownership options, and drawbacks include neighborhood concerns about architectural compatibility with existing patterns and unexpected degrees of density based on the zone." I believe the benefits FAR outweigh the drawbacks. Most potential new homeowners NEED less expensive options. Rezone ALL narrow lots to R2.5 and expand the number of what were once called "Permit Ready" house designs--getting rid of the one's with garages and driveways. There are dozens and dozens of narrow lot designs on the web that would be an asset to any neighborhood.
Opposed.
Not sure I understand this one
disagree strongly
I don't think R5 should allow a minimum of 3,000 sf, but rather a minimum of 4,000 sf.
Do not rezone historically narrow lots from R5 to R2.5.
Not in historic districts
Sliver houses destroy property values of neighborhood homes. Some have zero parking. They should be part of the cottage cluster plan.
Stick to the rules - no rezoning.
No skinny houses in historic neighborhoods unless they are very small and match the character of adjacent homes. I have seen some really cute historic bungalows in Sunnyside that add to the charm, but the new construction of skinny homes is aesthetically offensive.
Yes.
Not sure. I'm unclear what the definition is of "highest access to amenities" means. That could be very broad or narrow in its scope.
Maintain R5 on all R5 lots. Period.
NO! Yet another underhanded ploy to cram multiple homes on to lots in single family home neighborhoods.
yes
The historically narrow lots could offer potential for both great density and small homes! I hope that they're built on as intensively as possible!

get rid of the "a" overlay
NO. Do NOT change the narrow lots and make them narrower. Leave them alone. If you want to play with existing zoning, go do it in suburbia.
No, no, no.
No rezoning without vote of neighborhood.
Allow case by case approval of development on narrow lots with consent of adjacent property owners.
A step in the right direction.
This is the only aspect of the RIP effort that makes any sense and it is still too timid.
Good.
No, allow the increased density across the two zones by densifying it all to 2.5 and attached units encouraged.
Rezone to R2.5, please!
Just allow the underlying lot lines. Anything else should be an illegal taking. Not a lawyer, but it seems to violate the spirit of the takings clause.
Use those narrow lots for tiny homes only.
NO! Stop filling up every space. Yards are important!
Good.
Allow development for ALL NARROW LOTS IN ALL OF PORTLAND, PERIOD. More narrow lot development, and opening it up to community housing and cooperative designs could yield thousands of moderate housing units all across the region, and helps create density needed for vibrancy and small commercial districts like Mississippi and Division
I think the changes should be applied to all of the R5 zones. Every time you add a layer of complexity you discourage incremental development by small owner-occupiers
against narrow homes-they are unattractive, take away from character of neighborhoods. There are more attractive ways to build on these lots as compared to a single home that is an essentially a garage on the street.
Sure...
ok with this
Do not up zone R5 areas to R2.5 against City Council's recommendation.
Absolutely not. Narrow lots were never ever designed to be built on and the neighborhood building patterns reflect the 1 house per 2 25x100 parcels. Allowing narrow lot development of historically narrow lots will without a doubt increase the demolition of sound, smaller and affordable homes because the land value will be higher than the structure value. A developer will see a small home on lot that was previously in R5 and realize that a whole lot of profit can be made by getting to the 2 underlying lots and building 2 or more units where one affordable unit once stood. Never mind that that the density can be increased with that one affordable unit by adding an ADU, which is already allowed under the current zoning code.
Lots should never be smaller than 36 feet and 3,000 sqft.
I do not support changing current areas of R5 with underlying historic lot lines to R2.5.
Why not rezone all of the R5s to 2.5s?
Agree
OK
Please consider looking at the communities through a 'foot-to-pavement' approach. In Roseway, this 'highest access' approach seems feasible from a 'bird's eye' view, but the realities at the street level

do not agree. Placing significant increased foot traffic at the already horrible and congested intersection of Sandy/Fremont/72nd would be disastrous. Certainly there are more suitable areas of town requiring less public funding to resolve what are obvious issues to predict. Please consider viewing the parking situation during the evening hours when the current residents and their vehicles are at home.
Rezone all historically narrow lots from R5 to R2.5, with design improvements, to share land costs and provide housing options that more families can afford.
<ul style="list-style-type: none"> <li>• Adding housing without requiring adequate additional off-street parking to areas that already have narrow, poorly maintained streets that lack sidewalks will increase the risk of human-automobile interactions.</li> <li>• Expecting that the additional population will not own, park, or drive cars is unrealistic.</li> <li>• Expecting that the additional population will increase ridership on public transportation without adding sidewalks on the roads leading to the bus stop is unrealistic.</li> </ul>
Yes, but ensure that any affected historic homes on R2.5 are encouraged to be divided, not demolished to make way for more units.
Allow development on all narrow lots
Please rezone all of Portland to R2.5, or better to R0.
Narrow lots ignore offstreet parking which is necessary to accommodate livability in a city with the same number of streets but higher and higher density. In North Portland and other neighborhoods where skinny houses have been built in abundance in recent years the parking situation has become untenable. Ignoring the infrastructure necessary to serve all of this density is a recipe for disaster as more and more cars clog our streets and make it impossible to fulfill the requirements of daily life. Mass transit will not solve this problem, nor will penalizing vehicle owners with additional parking restrictions.
Very surprised this is part of the proposal because City Council voted this down on Dec. 7, 2016. Please rematch the discussion and vote and remove this provision entirely. These historic lot lines were a marketing gimmick employed during first platting and sale and were never meant to indicate discrete building lots—as evidenced by the fact that almost all of the lines are straddled by homes.
Smaller houses with more underground living space will increase density without being an eyesore provided architecture styles better than the crap they've been churning out and debasing our city with is implemented.
The city should not allow narrow lots that do not meet the minimum requirements.
NO for R5.
I support this, and rezoning all narrow lots to R2.5 within 1/4 mile of 15 minute buses and light rail stations.
This diminishes the character of a neighborhood and greatly affects the feel to existing residents and puts burdens on many areas with frail infrastructure.
This is a horrible idea. Please do not do this.
YES
this should be applied throughout Portland! Why increase complexity?
Historically narrow lots are not distributed evenly around the city. I think this would impact some area more than others. So I do not think this is a good idea. Do not allow because we do not want the a overlay. keep the development in the city centers.
I oppose rezoning historically narrow lots from R5 to R2.5. Since this is a new proposal to the RIP discussion, having been previously discouraged at the 12/9/16 City Council meeting, it should be given more time and review by the Council and by citizens.
this needs to be voted on by the public-otherwise NO

no upzoning
These restrictions are driving up the cost of development.
I strongly support Item 9.
I do not support rezoning narrowing lots from R5 to R2.5 in 'a' overlay areas. I do not think that lot size should be narrower than 36 feet. Homes become unsightly and difficult to live in long-term when they are too narrow.
Do not rezone historically narrow lots. This just leads to less room for yards, gardens and play areas.
Agree
No! No! No! This too will violate the "Scale of Houses" goals as in R2.5, 2 x 1,750sf = 3,500sf, which is greater than the 2,500 sf for an R5 zone. Change to 1,250 sf for R2.5 to have a more livable city, with more vegetation and soil permeability. But do not rezone any lots at all.
NO, unless this is on a busy street. Residential neighborhoods will be ruined by a bunch of skinny and tall 'houses' next door. 3000 sf is a tiny lot--are we planning to build many new parks to set aside green space for that which is being taken away? Didn't think so...
Good
Do not change our zoning
Opposed. Maintain historical character of neighborhoods. NO MORE LOT SPLITTING.
Do not limit narrow lot development in this manner.
Sure, why not? San Francisco looks cool.
Sounds like a good compromise that nonetheless will probably upset everyone.
yes; stop the subdivision of lots and crappy skinny houses.
This seems somewhat problematic to me; the rationale is not clear nor the benefits.
Do not do this. It's too narrow. Again, it only provides with a way to cram more people into the area without considering affordability, community, outdoor space.
Why not rezone ALL of them to R2.5?
allow houses for less than 3000 sf
I support these proposals.
Not enough R2.5
No! Do not rezone the "a" overlay to R2.5! What you have planned for the Concordia neighborhood (see earlier comment) will ruin the area between Killingworth and Wilshire Park. We don't have good bus service, we will lose solar production and access, there is already too much traffic and parking problems. We do not have access to "amenities." People want the amenities that we have now. And young people with families will want them too. People want this neighborhood to stay as it is, with yard to grow vegetables and fruit, trees for bees and birds and places for kids to play at home and not stay inside all the time. Don't call this NIMBY, call it wanting to preserve the neighborhood.
The current map shows these lots being rezoned in outer neighborhoods with less money and clout. Again, stop this madness to destroy Portland.
i disagree with the first point.
Completely and totally opposed. You should not be rezoning entire neighborhoods based on historical deeds from 100 years ago. This particular measure has the effect of destroying entire neighborhoods (such as Roseway or Alberta) based on historical bookkeeping accident. This provision is nothing more than a naked attempt to make middle class neighborhoods bear the brunt of any density increase while leaving wealthy neighborhoods completely untouched. Instead, any R2.5 rezone should be based on an application process which ensures that the density of rezone

properties is limited. And all neighborhoods should share in the rezoning, not just "historically narrow" ones.
No. This is being done without owners consent. Project needs a 6 month delay. Throwing this in at the last minute is not good.
With only 6.5% of the city zoned R2.5 it seems this could help increase opportunities.
I agree with the second point. It seems to say, only allow development when the lot meets the existing requirements for development. This should clearly be the case and should have been since the regulations were enacted.
Good
The biggest issue for me is how you inform property owners and engage them in this decision. People may not even know what is happening to their zoning. I am fine with adding density. However, we need to think about parking and transit as these areas (in some cases they are a huge amount of area) will blanketly get denser. Yes it is a chicken or egg question. But if we get denser, PBOT and TriMet need to be responsive.
Historically narrow lots should be grandfathered in. Full stop. Anything else should be considered a taking. Don't add restrictions.
What do you mean by "amenities?" Just because you put housing next to transit, does not mean the new residents will use transit. People with suburban jobs do not use transit. Stop destroying the livability of Portland by increasing housing density so people with suburban jobs can live miles from their jobs.
Density is good.
The RIP violates the purpose of the zoning code, which is to provide stability and predictability to neighborhoods and the development process. • With the "housing opportunity overlay zone" the R5 zone becomes more dense than the existing R2 zone. The R2.5 zone becomes more dense than the R1 zone. • A potential triplex on every lot is a multi-family zone by definition and erases the purpose and intent of single-family zoning. The credibility of the code (along with civic leadership) is lost as is the expectation for stability when every home sale becomes a potential teardown. The RIP violates the purpose of the zoning code, which is to provide stability and predictability to neighborhoods and the development process. • With the "housing opportunity overlay zone" the R5 zone becomes more dense than the existing R2 zone. The R2.5 zone becomes more dense than the R1 zone. • A potential triplex on every lot is a multi-family zone by definition and erases the purpose and intent of single-family zoning. The credibility of the code (along with civic leadership) is lost as is the expectation for stability when every home sale becomes a potential teardown.
There are far too many R5 lots which inherently make those neighbors poor for walkability. Much more of the city should be changed to R2.5 and home owners should be allowed to change from R5 to R2.5.
I support this change.
Opposed to the rezone of R5 to R2.5 - I've read a lot of pushback from the neighborhoods affected. Its time to listen to their needs.
Again, this is just cramming in more and more people in an already densely packed space! Encourage development in other parts of the city. Or if being close to downtown is important, why not push for all of this dense development in the West Hills?
Please find a way to allow development on historically-narrow lots, at least if the alternative is for the lot to house nobody.
Generally agree with this, but I am concerned with some of the areas that have been designated to be rezoned. For example, I live at N Boston Avenue near N Rosa Parks, and the pocket of my neighborhood is marked for re-zoning, creating an island of R2.5. There is no reason for this,

considering the blocks adjacent to Chief Joseph Elementary and Arbor Lodge Park are remaining R5. The same can be said for other blocks neighboring Rosa Parks. This does not follow logic and I would be opposed to this type of rezoning.
I agree with keeping neighborhoods neighborhoods and R5 lots with a 36' min lot width makes sense to me. I believe the proposal is doing the right thing by protecting certain neighborhoods from reestablishing old 25x100 lots.
Follow the direction of the Comprehensive Plan.
Agree
We should allow narrow lots, but require it to be attached if abutting other undeveloped narrow lots. This makes better use of space and increases design options.
No leave historical lots alone they were never n meant to be build on.
I am highly opposed to this change. We do not need more cheap greed-driven redevelopment. Destroying older homes to facilitate the cheap construction of shoddy new homes to be sold in a market feeding frenzy should be behavior the city guards against, not encourages.
In favor of rezoning all historically narrow lots to encourage development, not just those in the 'a' overlay.
This is possibly the most egregious affront of all. BPS staff resorted to picking the low hanging fruit in lieu of performing diligent analysis and decision making for this proposal. It is a sham to purport that some of the designated areas are close to frequent service transit, or amenities. Put control of this with the property owners of "platted" narrow lots and not the developers. Develop incentives that will encourage property owners to consider rezoning when selling the property. This shouldn't be that hard as a property should be more valuable when sold if two houses can be built on a former single family lot.
There is a reason 1 house was built on 2 skinny lots . The historic narrow lots where an anomaly and have no justification to be considered now
Agree
Your are grossly overdoing this density trip. As previously stated, you will in the long run completely change the character of Portland's older single family neighborhoods without adding the types of amenities to keep them livable. I expect these changes will encourage developers to tear down older homes and rebuild with skinny houses. Because of the small lot sizes you will not see landscaped yards or parking strips anymore. Since you are not doing this comprehensively, street congestion and parking problems will not be addressed. Likewise, new neighborhood parks will not be forthcoming to accommodate the thousands of new units you are trying to accommodate IN TRADITIONAL SINGLE FAMILY areas. And how about being honest and calling a spade a spade. Rename R5 to R3 if you intend to make it a one unit per 3000 sf district. Finally, why are you putting all of this increased density in East Portland and leaving the west side virtually untouched (except for one small area)? What kind of special treatment and/or bias is at play here? Your map looks pretty blatant in how it's treating East Portland.
FUCK THIS Allow development on ALL narrow lots, regardless of how long they have existed or what the minimum is. The proposed dimensions of 3000 sq ft and 36 feet wide completely ignore not just plentiful housing opportunities, but ones SUPPORTED BY Oregon state: <a href="http://www.oregon.gov/LCD/TGM/docs/House%20Plans%20for%20Narrow%20and%20Small%20Lots.pdf">http://www.oregon.gov/LCD/TGM/docs/House%20Plans%20for%20Narrow%20and%20Small%20Lots.pdf</a> ^^this document was produced in June of 1997. If ONLY we used such beautiful designs and encouraged narrow lots 20 years ago. We have an oppportunity for this NOW. Allow ALL narrow lots to be developed, and allow mid and small developers to create interesting, dense, missing-middle housing that will help with renters and homeownership possibilities. Also, utilizing a community land

trust for such lots, especially in Cully and St Johns, is the best way I feel to prevent displacement of immigrants and ethnic minority populations.
limit height. affordable housing

**10. Revise rules for all narrow lots (less than 36 feet wide).**

- **Require attached houses on lots 25 feet wide or narrower.**
- **Allow attached and detached houses on lots wider than 25 feet.**
- **Limit height of a detached house to 1½ times its width.**

The 'require attached houses' seems excessively harsh--especially since many have pointed out that the current zoning can handle the projected population increases through 2035.
Rather than require attached houses, incentivize this by allowing the builder more sq ft or FAR or units if they do so. Relax height restrictions to allow for higher buildings.
I agree
no comments
No. One of the key livability points is the feeling of openness within the city. Its part of why we have a dept of urban forestry in the city. Being able to see sky between structures should is vital to that livability. Combined with the reduced setback some neighborhoods could become dark canyons with token trees along the driveways - think San Francisco, Chicago, Boston or just about any other city where construction like this was allowed.
Need more specifics. How will this be enforced?
Goal doesn't seem to me to justify imposing more regulation. Height limits seem arbitrary to me.
limit height of detached houses; do not require attached houses
FOR
If the same solar access and tree canopy can be maintained, this is okay.
Yes
No, rules for narrow lots shouldn't be revised.
Yes, agree
Don't building anything, way too small.
Increase rear setbacks to allow for more usable rear yards and protect light and air for neighboring homes.
Outrageous upramp of destruction of neighborhoods in inner N, SE and NE neighborhoods. Absolutely ridiculous giveaway to developers. No NO NO!
The height restriction is excessive on detached houses on narrow lots.
This is fine
Requiring attached houses on lots 25 feet wide or narrower is a mistake. This would require an HOA - which would add additional financial burden to the potential homebuyer and it would reduce the number of buyers interested in detached houses. I live in a skinny house on a lot that is 25x100 and I would NOT have considered buying my house if it were attached to the neighboring skinny house. You are going to limit the appeal of buying a house on a narrow lot if you do not allow developers to build detached houses! After owning a condo and a townhouse in a prior city, I was ready to finally buy a detached house of my own - and not have to worry about common walls and a monthly HOA fee. If there were only attached houses available in my price range when I was looking to buy, it would have definitely reduced affordable choices for me.

I support adjoining houses on narrow lots to free up yard and parking. However there shouldn't be a height limit
Why? What goal is this change trying to achieve?
Indifferent.
This is a great idea to allow density and incentivize more creative designs. It will increase demolitions, but I am personally ok with that.
OK
25-foot lots should not be zoned, but should require a rigorous independent public process.
No
See above
Forcing attached houses limits options and adds cost. Diversity is better. Limit height maybe on detached houses to 1.5x.
support
Establish minimum lot sizes of 3,000 square feet and 36 ft wide. For existing lots 25 ft wide, allow only attached houses. Do not allow detached houses on existing lots 25 ft wide.
Agree on the first one disagree on the second and agree on the third.
Again, don't limit development on narrow lots so much. Research shows these can be some of the most affordable houses out there. Embrace them!
More attached homes - yes!
REQUIRE off-street parking for all new units built.
Attached houses are much more efficient from an energy standpoint, and produce a more attractive urban form, familiar to any visitor to eastern US cities. Portland's zoning should encourage the emergence of a local rowhouse typology.
These seem unnecessary.
no opinion
Continue to allow the development of historically narrow lots that are currently vacant and 25 feet wide or narrower Keep 33.110.260.C.1.a.(1) & (2) in the proposal!! Allow people to develop their vacant lots, don't limit based on NIMBY concerns. Narrow lot development can be an affordable infill option and if designed right (eg no garage in front, no off street parking required, etc.) they can be compatible.
ok if we are still following the set back of bigger lots
Agreed.
the height should not encroach on a neighbor's livability, meaning sunlight and view
I don't know the implications of this, but attached is fine, if there's still room for a patch of grass or garden, and you're not destroying nice homes to build it.
Allow rowhouses if feasible, but allow detached units as well if they are willing to forgo off-street parking
No houses on 25 foot lots.
Requiring attached housing is reasonable.
Maintain current lot widths and standards. Do not require additional housing.
same as above
No more skinny lots. Poor design. If nessacary, ut duplexes on 50 ft wide lots.
A height of 1-1/2 times the width is disproportionate.

I think current skinny lot housing is fine. No need to go the efforts to change the code, whether attached or detached, and regardless of lot width.
An example would help.
NO!!!
This does address 'green space' issue, but does not go far enough.
Safety first
No houses on skinny lots.
Great!
attached houses should not be 'required' but could be encouraged. if I buy a lot I should be able to build the house I want without unnecessary city intrusion beyond the kinds of rules we currently have, for safety and permits and so forth.
Agree
All of the above; but waive if the building features 2+ units
These rukes are insufficient. So i can put an unlimited number of attached homes on a lot 10 ft wide. That us how this is written. How many attached or detached houses can i put on a lot wider than 25 ft. Leaving this open to the discretion of zoning commission and carpet bagger developers creates opportunity for bribes and favors controlling the future in the overlay ares. Thanks for that
Preclude houses on 25 foot wide lots.
Need to make sure the housing height fits in with surrounding homes.
I support this
This is a lot of house in not much space no matter how you word it.
Why limit the height? To create a proportional volume in relation to the lot size? Allow taller narrower development if that is what the property owner chooses to build.
I'd stop short of requiring attached houses on lots less wide than 25', what if one wants to build a small house?
OK.
Way too restrictive; let people build the homes they want
yes, limit heights when have narrow home.
Agree
Yes
Keep zoning as it currently stand!
Perfect. Maybe reword: "On lots 25 feet wide or narrower, require attached houses if more than one house will be built on a lot.
OK.
Limit height of detached house to 1 1/2 times the width
A step in the right direction, though the height limitation seems silly.
Why is this written in complex jargon only City planners can understand? This seems like it's done to make sure you can push through your agenda. What are the implications of this? What does it mean in real life? How will it change the face and character of our neighborhood? Why did you designate only the areas with the cheapest and smallest homes? Why not encourage knocking down the giant homes on the ridge and replacing those with 4-plexes?
No to the limits on skinny houses. I get it. People don't like the aesthetic and it's new. Once again. Not the priority here.
Agreed, but nothing narrower than 25'

The height should depend on where the detached house is relative to the neighbor's yard. A 26' lot could in theory have a 20' detached house in the back that was 30' tall, right on the lot line. I would oppose that.
I disagree with not allowing a single detached skinny house on a 25 foot lot.
disagree..
If attached houses end up with a smaller overall footprint and more green space I'm all for this. I would like to see housing design consider the impact on the street - two skinny houses that are attached could have one driveway in the middle for both of them, saving the curb from being so chopped up. Housing should be proportional to the lot in terms of both size and height, so I like this idea.
Narrow houses are an abomination in neighborhoods that are R5 single family. Essentially they are row houses that work in areas like NW, but they are mis-fits in other areas. Also- they are so often too tall (i.e., the 30' ht. rule).
Larger lots and fewer narrow houses preferred
OK
Makes sense
On height, only if an existing home on either side is at least 1 1/2 story otherwise must be built to scale of existing homes
Not sure.
Agree, except that I would allow taller houses. R-2.5 is closer to arterials, and ought to be a step up in height, toward the 45' allowed on arterials.
This will not stop development of skinny houses, which are a bain on single family neighborhoods. Do not allow detached houses on lots less than 50'.
If I own a 25' wide lot and my neighbor owns a 25' wide lot, and we both want to develop our land, why should we have to attach our houses? I do not see the value in this requirement, especially with the tiny house movement that emphasizes individual dwellings. I think it's an excellent idea to limit the height of both detached and attached houses to 1.5 times their width.
Stop building in Portland's older neighborhoods. Build along the boulevards and main thoroughfares. There are more than enough sites to develop in these areas.
Yes. I support these changes. It sounds like this will avoid super tall skinny houses that block the light for normal sized houses next to them.
Allow height to be same height as for overall lot type. Proportional height adds confusing and cause for more clarifying language. Better to use building height limits related to setback distances.
Stop adding units in the R5 zone.
I find the third bullet objectionable. Tall, skinny homes can be graceful, as proven by much of the east coast and Europe.
don't require attached housing, but do allow it. Maybe just reduce side setbacks to 0' on all narrow lots? Or just remove side setbacks altogether from the zoning code.
Maybe ok for new developments but very bad idea in existing neighborhoods. You can drive around and see negative impact of this approach.
Too much city telling everyone what they want regular of what neighborhoods want
I don't understand the first bullet point. If you squeezed to row houses onto a 25 ft wide lot with 5 ft setbacks you'd have two 7.5 ft wide houses? The third bullet point would be a definite improvement.
disagree with arbitrary & complicated height limitation - use neighborhood height limits.

No further zoning restrictions are needed, especially concerning lot width on infill lots or redevelopment lots
yes limit the height .while at it limit the city planners who have no stake in there decisions
No!
agree
No to housing on lots of width 25 feet or less! Okay to combine two such lots and build house.
support
maybe
Detached housing should be limited or disallowed (on narrow lots) because this type of housing is less likely to be affordable.
I understand the reasoning behind this. It deals with aesthetics and proportion and scale, etc. If aesthetics were the only issue Portland were dealing with, I would support this. But again, we need to encourage building, not discourage it. If there is a 25' wide lot by itself, how can it be attached if there's no empty lot to attach it to? This makes sense if there are 2 empty lots of 25' each right next to each other, but for single lots, the only thing this will accomplish is that no house at all will get built, instead of a skinny one. What about decreasing side setbacks for skinny houses so that they're not so skinny, instead of banning them altogether?
Requiring attached houses on lots 25 feet wider or narrower will make either ridiculously narrow houses (12.5 feet wide) or shallow houses with no yards. This seems like a very odd proposal. I do not support this.
Agreed
NONONONONONONO
This is fine!
We support regulations that preserve side setbacks on lots and preserve solar access of neighbors. Thus, we support only allowing detached houses on lots that do not protrude into side setbacks. We support limiting house height to preserve solar access.
Allow Multiple mini home units on narrow lots.
No
no comment
no
Sounds good. Is a multiplex an option too? Row houses are so inefficient compared to multiplexes. Size and scale should match existing neighborhood, regardless of housing type.
big lots for existing homes, no razing
10. See #9 above. While I'm a great fan of attached houses, these rules seem highly arbitrary. Why are they necessary to protect our health and safety? How do they help resolve our housing crisis that the City Council extended on Oct. 4?
In some neighborhoods maybe.
disagree with proposal entirely
Attached houses on lots 25 feet wide or narrower should be required. Skinny houses should not be allowed.
Ok
I support a complete ban on demolition of historic homes. If they are in disrepair, they should be rehabilitated.
What is an "attached" house?

Generally agree
Do not allow houses on 25 foot lots.
I love attached housing; we need WAY more of this in our endless sea of detached single-family housing! Portland is supposed to be a CITY, not a car-oriented suburb! :)
Why require attached houses? People like detached houses. There aren't condo fees and there aren't shared walls. That's a good thing. Do NOT require attached houses. DO limit height. That is a good idea.
Stop trying to crowd houses onto lots in single-family neighborhoods.
More townhouses!
a 20' wide live/work building should be able to be built on a corner lot with a 5' side setback on the interior promptly line and zero setbacks abutting the public rights of way. A 16' wide shotgun cottage one or two stories fits on a 25' lot quite nicely. So allowing attach and detached houses on 25' lots should be allowed. If there is a recommended configuration, publish it.
Allow attached and detached houses on lots wider than 25 feet .
Yes, Sounds good.
Please require attached houses on all lots less than 36 feet wide.
Allow attached and detached - depending on what makes sense per situation. If there are multiple neighboring narrow lots, then requiring attached houses makes sense. If it is a single narrow lot couched between standard size lots, allow a detached house to be built.
I definitely like encouraging (but now requiring) attached houses whenever possible. Requiring limits development of individual orphan narrow lots. Also, why limit the height?
Agree no skinny SFD
Another good place for tiny homes.
Attached housing isn't desirable, and is ugly!
25' is quite narrow for detached houses. Consider increasing to 30' for detached skinny houses.
all townhouses should be required to have rooftop or 2nd level deck to have more community connection: it would be amazing if townhomes were stacked and tiered in different ways to give visual interest and green space options along the rooflines
Height limit should be based on adjacent houses, not the width of new construction. Tall houses are fine as long as they are not obstructing a large percentage of their neighbors' sunlight and views.
this seems like a reasonable proposal that will increase neighborhood acceptance
Once again, why are we limiting the available housing stock in a housing emergency?!
ok with this.
good requirement to require attached houses on narrow lots and allow attached houses on any lot. a positive move to keep narrow detached houses from feeling like mini high rises.
Limit height of houses on narrow lots to 25 feet.
No. No. No.
Agree
Um...
<ul style="list-style-type: none"> <li>• Adding housing without requiring adequate additional off-street parking to areas that already have narrow, poorly maintained streets that lack sidewalks will increase the risk of human-automobile interactions.</li> <li>• Expecting that the additional population will not own, park, or drive cars is unrealistic.</li> <li>• Expecting that the additional population will increase ridership on public transportation without adding sidewalks on the roads leading to the bus stop is unrealistic.</li> </ul>

Good proposal, but do not limit height unless adjacent homes are single story. 2.5 story row houses with an internal ADU are an ideal land utilization model.
Please do not require attached houses. Please do not limit the height of detached houses.
More restrictions on what the homeowner can do to a house! Oh, but it's not really the homeowner's, because the RIP now requires it to be attached if the lot is smaller. And since the lots are all going to be a lot smaller after RIP is implemented, that's a virtual certainty for nearly everyone. RIP wants to destroy existing single-family detached housing and actually make it illegal by zoning it out of existence. These narrow lot requirements show that the City wants the homeowner to be satisfied with much, much less than previous generations and provides no public process to redress inequities.
This section is moot when following City Council's direction to not build on narrow lots.
Can we rebuild buildings we've lost to the wrecking ball/backhoe? New houses degrade our cities character (reflecting the lack of character of the blight developers)
Maintain neighborhood character and feel.
I support.
Should be possible to consider adjacent narrow lots as a unit in order to increase range of opportunity. If you want narrow houses, treat narrow lots one at a time.
Leave existing rules in place.
yes
I see no reason to limit options for builders. I'd love to see both attached and detached houses be built at all price points
lots 25 feet wide should not have more than one house. Narrow lots should not have more than one house. Limiting the height would be good.
I oppose changing rules on narrow lots until a more involved and lengthy discussion within the city has occurred.
see comment #9
no this, no rip...allow a vote on the rip, don't do this as it's racist
These restrictions are driving up the cost of development.
I support bullets 1 and 2. Regarding bullet 3, Limit height of a detached house to 1½ times its width, I support the concept, but urge revision to for support of the proposal. Revise the narrow lot detached house height limit to not 1.5, but 1.6 times its width.
Again, I do not support decreasing lot sizes to less than 25 feet wide.
On lots that are already buildable then ok but do not make any more narrow lots buildable.
The narrow lots are already an eyesore, and the homes on those lots tend to languish on the market. Restrictions on how narrow a lot can be would be welcome.
Agree
Again, too many 'loop holes' which will violate the "Scale of Houses" goals.
if these tiny lots are to be built on, must be a tiny house (under 1000sf) and/or be on a busy street.
Good
Do not change our zoning
Do not limit narrow lot development in this manner. Do not make developing these spaces more difficult than it already is.
Meh. Don't get too crazy.
I like that this discourages skinny houses.

Requiring attached houses is a great idea in order to make better use of the land.
Do you end up with one really long attached house or a long dark 5' side lot? I agree with limiting the height. Maybe terrain doesn't allow an attached house.
I am very supportive of these guidelines.
ok
I support these proposals.
why not just make smaller houses? attached houses have no yards and look terrible.
NO. Do not require this.
A lot 25 feet or less should have ONE house, not multiple housss. Building to this density will destroy residential green space and tree canopy.
i am against shotgun style houses. they have never worked in the long run. 20 years from now we will scratching our heads----in what city in america are these house valued and valuable? even post war housing denigrated shotgun style houses as cheapening a neighborhood.
Opposed, because of provision 9 above.
Project needs 6 month delay.
No height limit needed when using similar size structure precedent.
Good
I don't love the attached duplexes. But I like them more than a bunch of sticatto skinny houses. Please, no neuvo-snout houses either. The design should feel less like a duplex and more like a row house or similar.
Yes to attached housing, but don't limit the height. Why would you do that?!? Let them all be 4 story brownstones.
Height limits are a good idea. The total square footage of new homes should be less than 2,000 square feet. We do not need skinny or detached homes in Portland because we do not have the job base for the new residents. Portland needs to create job density before increasing housing density or the noise and air pollution of our very congested streets will just get worse.
Density is good.
The city is really lacking in rowhouse inventory and if these changes result in more rowhouses, I'm for it.
I support this change.
Again, just cramming in more and more.
Attached houses are great!
No comment.
I don't see a problem with requiring attached housing on lots 25' wide. It will allow for 5' more of building space. I am 100% against the proposed height limit. I'm assuming going forward, 25' wide lots are in high density zones... we need to maximize the lots in these zones, NOT restrict the potential of them
Follow the direction of the Comprehensive Plan
Agree
We should allow narrow lots, but require it to be attached if abutting other undeveloped narrow lots. This makes better use of space and increases design options
Great idea to require attached houses on lots that are 25 feet wide or less. I am indifferent to the other proposals.
A gift to developers.

Agree
This will certainly help to reduce the amount of those ugly skinny houses which stick out like sore thumbs in traditional neighborhoods with craftsman bugalos, etc.
Reduce limits and see what could happen. Again, I shall link the State of Oregon's guide on narrow lot housing produced in June of 1997: <a href="http://www.oregon.gov/LCD/TGM/docs/House%20Plans%20for%20Narrow%20and%20Small%20Lots.pdf">http://www.oregon.gov/LCD/TGM/docs/House%20Plans%20for%20Narrow%20and%20Small%20Lots.pdf</a>

**11. Revise rules for parking and garages on all narrow lots (less than 36 feet wide).**

- **Allow, but don't require, parking on narrow lots.**
- **Continue disallowing at-grade garages on attached and detached houses less than 22 feet wide, but allow tuck-under garages on all attached houses.**
- **On a lot abutting an alley, require access from the alley when parking is proposed.**

We do not have sidewalks in SW .. if people are parking on street there is no place to walk!!!!
Off-street parking should be waived on all sites that are implementing the new 'housing opportunity' measures within the a zone. Not just on narrow lots. What you have proposed is good but it needs to go farther.
Yes all these proposals are fine.
I would require parking on narrow lots. I would allow at-grade garages but give a additional FAR for basements and tuck under garages.
I agree
no comments
If we can't get rid of cars, lets hide them in alleys. That's been proven to be a good solution. Again, this seems like a workaround to benefit developers.
Parking exemptions should also consider the on-street parking demand of the surrounding neighborhood. If parking already is a concern, then an exemption should not be allowed.
Parking has already affected the livability of our inner eastside neighborhood. This proposal will only make it worse.
Parking should be mandatory. The streets are crowded and are getting worse.
Good!
Fine with all this narrow lot stuff
Seems reasonable. I think I get the aesthetic issue with garages, though it still seems subjective and what about garages that aren't out front (say behind the house). Seems like they should still be allowed to be at-grade.
require parking on narrow lots
FOR
Parking should not be required anywhere.
Parking and garage allowances for lots 22' wide or less is a side issue. Lots less than 22' wide should not be allowed.
Ptld should be requiring parking for vehicles. Not everyone will use mass transit & we will still be driving.
Require parking and allow garages.

All homes must have parking for that home. DO not allow homes/apts that do not have parking for each of its units
Yes
Sure
Require parking and garages on all lots! Considering there are few alley's in Portland, this does not apply.
Outrageous upramp of destruction of neighborhoods in inner N, SE and NE neighborhoods. Absolutely ridiculous giveaway to developers. No NO NO!
Bundling questions this way is deceptive. Fix infrastructure and transportation needs before you allow significant added density.
This is fine
Tuck under garages should be mandatory not optional. We need more off street parking
Why? What goal is this change trying to achieve?
Seems reasonable.
Yes.
No, all places must have their own off street parking.
Sounds fair. It does appear street parking and off street parking for skinny houses uses same frontage, but when no drive exists space can be used by others when not used by owner so it creates a higher overall use
Don't know
Great
No
Do not allow parking on narrow lots. Waste of good housing space.
Houses currently are built with garages. People like garages. They want to buy houses with garages. Alley access destroys backyards. Most alleys are overgrown. Will the city improve them? Or will they require the person building to foot the bill for the improvement? It's currently the builder. PBOT typically wants dedications along alleys. This then further limits what type of house can be built and makes backyards smaller.
support
Do not require parking anywhere in the overlay zone. Do not allow any new curb cuts.
Require parking on all lots, or require common offsite parking to meet needs of neighborhoods. Yes for alley access for parking.
DISAGREE! WE NEED MORE OFF STREET PARKING!! THE STREETS ARE TOO CROWDED WITH CARS ALREADY!!!
Fine. I'm glad we're not requiring parking
incentivize alleys, where possible, to tuck garages around back.
REQUIRE off-street parking for all new units built.
Strongly support this.
Overall good but some alleys are not very passable and adding extra traffic may cause quick degradation of the road surface.
no opinion
great. let's get rid of parking requirements. please consider how requiring alley access might interact with your proposed increased front setback.
good

Totally support this. I would add that all new infill development of any type on a lot that has abutting alley access should be required to use that access for off-street parking. Do not let people put in new driveways where they do not already exist.
I like allowing the "tuck-under garages". How about encouraging this. In 100 years this could be another unit.
How will you prevent lot divisions for development purposes.
Continue to require parking.
Yes but on a lot abutting an alley do not make the owners pay the full price for improving, (paving) the alleyways from street to parking locations.
Require parking.
Looking at a garage door from the sidewalk or street is ugly. Prefer a porch, steps, doorways...
I would say don't allow off-street parking on narrow lots
You must make provisions for off-street parking, even for narrow lots. You cannot continue to allow, or encourage, on-street parking. There are many alleys in this city that haven't been used as alleys for years. Who is going to pay for clearing the cluttered alleys? Will the alleys be paved? We have a garage sticking into our alley. Would we be required to tear it down?
Everyone needs a garage (or at least parking), for a car or for storage.
Require parking. Tuck-under garages should be required.
Require off street parking.
Glad that parking is not being required
Not allowing for parking is a very bad idea.
Off street parking must be available. Many streets have no sidewalk making walking dangerous dodging around parked cars. Streets are narrow. Traffic on major roads in my neighborhood dense at rush hour. Many drivers cut through neighborhood trying to avoid the jams.
Require off street parking go all new development. No more skinny lots.
Parking should be required particularly as the huge apartment buildings do not have parking but many of the tenants have cars already adversely effecting those who must be able to park near their homes due to age or physical limitations. Also many of the older homes in SE do not have garages or on-site parking as they were built well before cars became common. It seems that the alley requirement could pose a problem for those have to turn to enter and exit their property.
Bullet point 1: Fine. Bullet point 2: Who cares? If someone wants a garage at grade, let them do so regardless of lot width. Bullet point 3: Alley parking: Makes sense.
On a lot abutting an alley...
Parking goals are highly overrated. Parking is necessary because many houses have multiple tenants with cars. There is not enough on street parking as is.
NO!!!!
safety first
Require parking for all new developments. It's becoming unlivable.
Great! Please also reduce rules for parking and garages on all residential lots. If someone doesn't need or want parking, don't make them build parking. Required parking just makes housing more expensive and if housing affordability is more important than car storage, then we shouldn't require car storage.
absolutely allow and maybe require parking! does not have to be a garage, can be just a pad or driveway. but for god's sake quit eliminating parking!

This is going to potentially cause problems with parking congestion as more people migrate in without off-street parking spaces
Disallow parking entirely on narrow lots
Require the dang parking, stop this madness. Narrow lots make the parking situation worse. What part of there is no more room, do you NOT understand
Mandate parking for all new construction.
Really? Have you visited the SE lately? Parking is already a challenge for residents. Not requiring parking will make this even more of a nightmare.
Need to consider street parking if not requiring onsite parking
Require parking. People still have cars and end up parking on the streets, leaving no place for visitors to homes, restaurants or shops.
I support this
Parking must be included with every new house.
I recommend requiring parking. One of the reasons given for not requiring parking is that driveways and garages reduce limited parking space on streets. Recogniton that on-street parking is limited, however, argues for requiring parking. Allowing accessory dwelling units without requiring parking will increase the number of persons seeking parking and aggravate availability of that already-limited parking space. Not requiring parking will induce occupants to park on streets away from where they live and impose burdens on homeowners and residents normally parking by where they live, for they then will not find space near their homes. Homeowners and existing residents should be able to park alongside their homes. Consequently, I am sensitive to impacts created by developments on other residences. Thank you for considering my comment.
this makes sense
Parking should be required.
Parking is a big problem city-wide. How about limiting the number of cars per residence? That would make the parking more proportional to the housing, and encourage people to use other transportation options.
OK
I would suggest banning personal parking spots and garages so investments can be focused on housing for people, not cars. It doesn't matter if cars are homeless, they'll be fine in rain.
parking is a huge problem here. all housing should have adequate parking created at the same time. I know that isn't what you (the planners) think. But it IS what we, the people, think.
Require parking in all types
Require parking!
Keep zoning as it currently stand!
I think parking should be required.
stop free street parking.
Great.
Good on alley rule.
On a lot a budding and Allie require access from the alley when parking as proposed. Require parking
Parking should be required on all lots. Trimet in this neighborhood is horrid and the biking agenda only serves able-bodied people. We have a massive parking problem already, and you just want to make it worse.
Agreed on alley point. Still require garages...make developers dig out the lot if they want to make their money.

If no parking is required, there will be no parking. That's not a good idea. There should be some way of seeing how much on-street parking is available, and determining whether or not to require parking based on on-street availability.
yes
Parking should be required for all houses. People have cars. Some houses have many cars. People have visitors in cars. EVERY house should require parking.
People need a place to park their cars near where they live. How to get get groceries home, get kids, car seats, etc. ? Think about a future with more electric cars that aren't close enough to home to be charged. If environmental issues are part of future residential planning - plan now!
Require onsite parking for all houses.
I think parking is important and should be required on ALL lots. I've seen what happens in neighborhoods with developments that don't include provisions for parking. The streets are PACKED with cars.
OK
Sure
Ok
All proposed new housing must have parking on the lot No exceptions
I support these changes.
Agree. Add in some mechanism for LIDs to improve alleys. Allow gravel surface as sufficient for alleys to be usable.
This is reasonable.
A terrible idea to not require parking on narrow lots. That just shifts parking to overcrowded street parking. Require parking on narrow lots. Good idea about the alley way.
YES. Parking needs to be required in all areas. Parking is such a rarity in all neighborhoods but especially along busy thoroughfares.
All new homes must have off street parking. No tuck under garages.
Yes. I support these changes.
Define for clarity - at grade versus tuck under garage. Current codes are working - maintain requirement for 'offstreet parking space' and allow the space to be within a garage. Garage works most efficiently when provided with low slope (5% or less) street level entry and setback from sidewalk. Current codes dictate garage door setback from street 18 feet. This is same in both Residential and Commercial codes and allows for cars to maneuver safely onto and off the streets. (more than 20%) driveway approaches to garages create difficulty for vehicles to enter and exit safely. Garages are a worthwhile amenity for residents - either for vehicular storage or other uses. On alley access properties - require parking access required, then also require waste and refuse collection on alley.
People need parking!
I like the alley provision. I see too many homes get built with front driveways when there is an alley in the back.
Forbid parking on narrow lots. Or say if you do not provide parking, you get a bonus unit allowed. We need to house people not cars.
Tuck under garages are not functional as built on 60 th and Tillamook. Unless you goal is to destroy personal mobility and force everyone on mass transit.
Cars will not go away! They need to be part of your plans! And I am someone who does not use my car very often

Require onsite parking.
Sounds good.
Parking should absolutely be required because street parking is already difficult enough! We shouldn't end up like the neighbors in and around NW 23rd street. It's hard to visit friends there because there is no parking!
Please do not reduce parking requirements, you are putting undue stress on these neighborhoods, believe me, they own cars, to say they don't is a mis representation of the truth.
No. Parking absolutely needs to be required off street.
Parking should be required for all properties.
if tuck under garages are allowed, include that floor area in FAR calculations.
Developer should be required to add parking.
support
Take city should live up to its commitments to housing affordability, environmental sustainability, and transportation equity by eliminating all requirements for parking and/or garages in residential zones.
If parking isn't required, then I might support this. The parking requirement is stifling to development. That said, if someone is going to build a garage, then it seems arbitrary to force it to be below grade. That just increases the cost to build and thus, the overall cost of housing.
Okay.
Agreed
NO!!!!!!!!!!!!!! Visitors can't park. As a medical home service person I have to park 3-4-5 blocks away from a home.
Thank you for waiving parking requirements on these properties.
Houses need garages, period.
Tuck-unders just result in a taller skinny house. How about banning garages on skinny houses? On street parking for one car is equivalent to the width of a driveway.
Require parking on narrow lots. We are decades away from traveling with only public transit. If you don't have parking on narrow lots, people will park their cars in the street, making it difficult for visitors to find on-street parking.
No. Parking should always be required. We can't all ride bikes and even those of us who use public transportation have cars for out of city travel.
Not sure
this is all bad
11. Garages and driveways on narrow lots really suck with regards to health and safety. Have you ever watched a person with a walker or a cane try to navigate the rowhouse area of NW Portland (Thurman, Upshur, etc) ? Having yet one more curb cut for a pedestrian to deal with, one less on-street parking spot and all that extra impervious surface is bad for our salmon and bad for us! Plus garages tend to promote a sense of isolation as most people use openers these days. If we are going to talk about aesthetics, it leads to poor house design as well. This item belongs in suburbia if it belongs anywhere.
Parking should be required on narrow lots.
Agree with requiring some sort of off street parking In dense neighborhoods.
disagree with proposal entirely
Tuck-under garages should be required on all narrow lots.
Ok

Parking underground should be a requirement for any narrow lot.
Always provide parking for housing. Parking cars on streets presents dangerous challenges to bikers and pedestrians. Portland is dimly lit and it is difficult to see people clearly when they're trying to navigate around parked cars.
See previous comments.
Yes.
Gereally agree but waivering on not requiring parking on narrow lot. City neighborhood streets are getting more and more crowded with off street parking which also has an effect on city street maintenance and bike safety.
Require parking with all new construction. Most alleys are worthless and impassible.
Again, what you are proposing will result in neighborhoods crammed with multiple unit lots and cars everywhere.
I always LOVE seeing parking NOT required. I know that a TON of grumpy old NIMBYs show up to dominate public hearings and whine and whine about parking and "congestion." Well, car congestion comes WITH large, popular cities! It's a fact of life. There's always Youngstown, Ohio, or Buffalo, if you want a city with low car congestion.
The reduction in garages and driveways is contributing to an epidemic of car prowls in some neighborhoods and producing more stressful and dangerous neighborhood streets as children dart between parked cars. Long lines of cars parked on the street also endanger bicyclists.
Require off street parking for all homes of all kinds. Require TriMet to provide parking for riders who need it.
Require parking. Only developers like the idea of that word "allow".
DO NOT waive parking requirements.
Measure building height from the driveway of a tuck under garage
The focus should be on encouraging a good interface with the pedestrian realm. This doesn't seem to get there yet.
Garage doors which face the street on narrow houses, attached or detached should be limited to 9' in width an should be set back from the sidewalk a maximum of 5'.. allow garages, just now parking in front of them.
Don't require parking on narrow lots, or houses less than 22'. Hopefully in long run, we improve mass transit and cyling ( ala Amsterdam!) Don't even require alley garages --but if it must be, alley access is better than front access.
Sounds good.
All of the above.
Yes, but why require parking anywhere? get rid of all parking requirements
Only allow a build if there is room for off-street parking. Our streets are too narrow and already loaded with parked cars! All this infilling will finish off what little mobility we have left in our once fine city.
Require parking on all lots.
REQUIRE parking on property.
Good.
Many side streets outside city center are not wide enough to support lots of parking while still allowing two lanes of traffic. If the requirement for on-site parking is removed, the cars will need to go somewhere. Even with good public transportation and ride sharing, most people have cars.

YES!!! Allowing units without parking will help create higher density and help people utilize the expansions to transit that are coming to metro
yes!
Why do we add parking stock in alleys? Alleys are some of the best spaces to improve for pedestrian, play, and gardening uses. Requiring parking access once again prioritizes the storage of private property over people in the public realm. We have thousands of miles of parking already. Can we think of people before cars at some point in Portland?
Tall skinny houses suck... change them to look better.... from the street. Back garages and car pads. Look at the development on 22nd Avenue, Seattle, WA 98122 between Jefferson and Yesler. That's a great one...
parking should be required, even for narrow lots. there isn't a ton of street parking around here - extra cars on the street from narrow lot inhabitants is going to make streets more dangerous (they're narrow).
above points all supported.
Generally agree.
If these narrow lots are already in R2.5, then the proposed changes above are fine. However, if areas within R5 zones that have multiple underlying lots of records are changed to R 2.5, then nope, do not revise rules.
Parking is now a major problem in Portland. Off street parking should be required when feasible.
I oppose all of these changes. You should require parking for all houses, regardless of lot size. Get the cars off the streets, so people can come visit them! Granted, at-grade garages are ugly, but they are more affordable than tuck-under garages and less prone to flooding issues. Let the developer put whatever garage in s/he wants. It'll be most cost effective, which means the house won't need to be priced as high. Requiring alley garage only is a terrible idea, because NO ONE will use that parking spot because it's so hard to get in and out of. That just means there's more cars parked on the street! Go look at the houses near the Green Zebra on Lombard that have alley-accessed garages. All the cars are just parked on the street in front! Having a front facing garage and driveway for each house would get all those cars off the street.
I am in favor of waving any parking requirements. Having parking minimums undermines our ability to meet affordable housing needs as well as build for a future that is not dependent on personal cars.
Agree
Ok
Require parking on all new development! Street level parking already makes neighborhood streets in our area nearly impassible. Most streets at evening time would be better designated 1-way due to the proliferation of street parking. All of the current residents live within the same distance of transit and yet our roads are congested with parking. Increasing density 2-3 fold 2-3 blocks leading to the main corridors without requiring off street parking would make most roads impassible during the evening and trap most residents at home. I moved out of Beaumont for this precise reason. I lived at 49th and Klickitat and could not regularly secure parking in front of my own home.
<ul style="list-style-type: none"> <li>• Adding housing without requiring adequate additional off-street parking to areas that already have narrow, poorly maintained streets that lack sidewalks will increase the risk of human-automobile interactions.</li> <li>• Expecting that the additional population will not own, park, or drive cars is unrealistic.</li> <li>• Expecting that the additional population will increase ridership on public transportation without adding sidewalks on the roads leading to the bus stop is unrealistic.</li> </ul>
Stop requiring parking. We can all learn to live without cars in the next 20-50 years.
Good

OK
This point essentially guarantees that the already at-capacity adverse residential parking situation in Portland will continue to deteriorate. RIP will make it very attractive for developers to eliminate off-street parking in favor of density and the size of the already limited-size houses they're allowed to build on these tiny lots. This creates more traffic and destroys on-street parking opportunities. It's nice to allow people to park on their own lots if developers agree, though--Comrades at City Hall are so generous in looking out for the little people!
Another instance of City Council voting opposite (allowing garages) and planners disregarding. Please restore integrity and transparency to the planning process.
The opposite of all of this^
Off street parking is a must! Do not continue to allow building on lots that create parking issues. Allowing people to build where they would park is creating more problems
Off street parking and garages must be required. Anyone who thinks people will live without cars is living in a fantasy world.
I support.
Good.
Yes
Parking requirements should be waived for more lot types. Reduced parking makes multiplexes more affordable and more likely to be built.
this is a great proposal !
Require parking on narrow lots. Other two rules sound good.
see comment #9
no parking is stupid and not visionary
These restrictions are driving up the cost of development.
I strongly support Item 11.
I support requiring access from the alley when parking is proposed for narrow lots (but I do not support lots narrower than 36 feet). I support continuing to disallow at-grade garages on attached and detached houses with the exception of tuck-under garages on all attached houses.
I would like to require parking on all lots. The other two sound good.
No opinion
Tuck under garages are eyesores, ruin street life, places for kids to play, and will likely just be covered to ADU's (legally or illegally). Won't be needed if the City abandon's its planning war against it's citizens.
no comment, needs review and input from city planners.
Do not change our zoning
This is OK
More parking is better..
I'm especially in favor of the required alley access. The difference between a horrible skinny house and a decent one ALWAYS comes down to whether parking is provided. Not providing parking off the front retains on-street parking and uses alleys as they should be.
Build a house, provide a parking space.
What if the alley is not maintained or connected through? What about the future of turning alleys into greenways, gardens or pedestrian ways? I like the intent of getting cars out of view from the sidewalk, but it might be missing other opportunities or unforeseen problems.

Off street parking MUST be a requirement, you are pushing so many cars into our side streets that many of them are essentially down to one lane, further contributing to the traffic problems.
I believe that parking requirements are a must for any new housing. The idea that people will not be driving cars is inaccurate and the congestion on streets is important to avoid.
I am very supportive of these guidelines.
Already too many problems with on street parking on narrow streets in portland.
Support!
do not allow parking on narrow lots
REQUIRE PARKING, the cars are filling the streets. Until we are carless society, we need somewhere to put cars. Until public transport can get me from SE to NW portland in less than 45 min, cars are going to exist.
I support these proposals.
Seriously, this will continue to contribute to the parking problems. I owned a house on a narrow lot and parking was underneath the house. It was not an expensive house though it was built in the 1920s. It is feasible to make parking happen. People are still going to own cars for some time.
Parking onsite not needed and no regulations are necessary
bad idea not to require parking. These people will still have cars. often 2 of them.
Require parking on each lot. Tuck-under garages are not used to store cars because today's cars are too big to fit. Especially the SUVs that people have.
The criteria should be contingent on current neighborhood resources, not lot size. If the street is narrow, and some older homes don't have garages or driveways, new construction should at least have off-street driveways.
i a strongly against building on substandard narrow lots, so more parking on the street wouldn't be an issue
Completely opposed. Many narrow lots are on narrow streets which CANNOT support street parking by all residents. Parking requirements MUST take street width and available street parking into account.
Require off street parking. This is destroying neighborhoods. Project needs a 6 month delay.
Why does Portland care about how a property owner builds covered shelter for their assets? Will anyone need a garage when autonomous vehicles pick us up for work in the morning?
Good
See above - have some serious conversations with TriMet and PBOT about this.
sure.
All new housing needs parking. Portland's new residents work in the suburbs and drive to work. Many older homes do not have parking, and when new housing is put in for people with suburban jobs, the older residents lose the parking spot in front of their house.
Density is good. Why does the city care if a taxpayer builds covered storage for their assets?
Tuck-under garages on every attached housing cut lead to excessive curb cuts.
I support this change.
Thanks for not requiring parking. Have you considered requiring multiple cars to share a 1-car-width driveway?
No comment.
I believe the city has really done a disservice to many many neighborhoods by not require parking. People like having a cars. I know the city has done it's best to try and change this fact... but in reality,

all they've done is make our neighborhoods worse, much worse and pissed off about everyone affected by these none requirements.
Follow the direction of the Comprehensive Plan
Agree
Not all alleys are drivable. Probably 25% are not realistic to access due to under management by neighbors. Having no garage on an individual skinny house makes sense as one street parking spot is permanently lost for most likely one off street spot that is only used when redolent is home and takes away a good usage of the lost street spot. Define tuck under garages? Does this mean sub grade level? Not sure that is best long term requirement as it would add to construction costs which adds to buying costs. Also any requiredsjb grade design has highest risk of future issues based on living in NW with so much rain and water management issues
More parking is needed not less. Cars will still be used and they will have no where to park.
At-grade, tuck-under, who cares? Either way, they are both garages that have driveways that provide minimal off street parking in exchange for disrupting the curb line, street trees, street parking, etc. I would take things a step further and not allow parking on narrow lots, unless access is taken from an alley.
City Council gave direction in December 2016 that this was off the table. Honor that direction instead of wasting time pursuing a non starter initiative
Just what we need. More cars parked on the streets
Agree
+1 alley access, alleys are really underused.
And where do you expect them to park their vehicles? Down the street in front of the new apartment building which doesn't provide any parking either? Yes, don't allow garages on too skinny of houses as they don't use them as garages anyway. However, you should allow driveways for narrow lots so they can get their vehicles off the street. Parking is becoming precious thanks to poor parking requirements by the City.
let this be decided per lot and development. Besides the "at-grade garages" that make snout houses, I honestly think there are many ways to approach parking requirements or allowances that are appropriate per lot.
Not good planning in outlying Southwest neighborhood with narrow, unimproved streets. It would shut down residents' ability to walk in the neighborhood safely.

## 12. Make improvements to the R2.5 zone.

- **Require at least two units when new development is proposed on a 5,000-square-foot lot or larger.**
- **For land divisions, reduce the minimum lot width from 36 to 25 feet.**
- **Allow property lines to be adjusted to create a small flag lot (less than 3,000 square feet) when a house is retained.**
- **Create rules for small flag lots that restrict the size of the new house to 1,000 square feet and the height to 20 feet, and require exterior design elements.**

Once again, the 'require at least two units' is too strict/one-size-fits all
No. People should have freedom to live large or small and again this does not get to the root causes of poverty or affordable housing.

Flag lots are an abomination
Yes. I think we need more min density rules in these zones. Why not also consider some min density requirements in other zones like R5?
Yes all these proposals are fine.
Requiring two units for R2.5 would not be good if it paired with historically narrow lots. Land divisions should stay at 36 feet. Less than 3000 sq ft would make for no yards 1,000 sq ft house on small flag lots at 20 feet sound ok. If these were paired with keeping the overlay at 1/8 of a mile from city centers then I would be for them but not if they cover most of the city. ( 1/4 mile )
I disagree
no comments
So if a homeowner owns a 5000 sqft lot and wants to build an ADU, they have to build two. That's genius! What if the owner can't afford or doesn't need a second ADU? Again, another inequitable rule favoring developers.
Again, appropriate FAR needs to apply so that sufficient land mass is not covered by the buildings.
In am seeing 3plus story houses on recent infill in my neighborhood. This has detracted from the livability and causes over crowding. The reason I purchased a bigger lot was for more privacy. My neighbors delveloped an unsightly 3.5 story row house into a single family lot. They also split the original house into two units. Now there are 4 families in the once single family lot. This has caused tension in the neighborhood and fostered a new project that completed across the street that is over 3 stories. Now the once stately neighborhood does not have a clear view of the park and has devalued our home value. It is to a point where most homeowners are selling to getting out before more infil detracts from home value. This is poor planning and will get worse if it keeps going unchecked.
Do not change the zoning of my property.
Sounds good
Support except for mandatory number of units. Increasing options and then letting the market decide is the way to go.
NO REQUIREMENT FOR MORE THAN ONE UNIT; NO REDUCTION; NO FLAG LOTS; NO MORE DENSITY FOR
R2.5 as a zone is only okay if the neighborhood is already as dense as the R2.5 regs would create.
I disagree re 2 units for 5,000 square foot lot.
Do not require 2 units or reduce the minimum width of a lot.
Yss
R2.5 zones shouldn't be "improved." They should remain as-is.
I strongly oppose the requirement of at least two units on 5000 sq ft lots. A great deal of Portland's character comes from the single family, Lewis and Clark Exposition-era homes throughout the City on standard 5k lots. This proposal will endanger more of those homes for destruction to make way for cheaply built, profitable double units. It will also change any vacant lots to make for a more hectic neighborhood with all the attendant parking and asthetic concerns. Please do not do this.
unsure
Leave as is. Do not require two units, this is just another way for the city to get more taxes that they can waste.
new rules for flag lots with size restriction is good- introduce cap of how many flag lots are allowed per year per neighborhood.
Disagree heartily. Reducing minimum lot width is a very bad idea. Flag lots are terrible.

This is fine
This is a bad idea if a lot is 5000 sq ft the owner should be permitted to build what they want. This is over regulation by the city that isn't going to fix the housing shortage
Why? What goal is this change trying to achieve?
Great.
Yes!
No, If one wants build a home on a 5000 sq ft lot, that is fine. Flag lots do not enhance the neighborhood.
Good idea
Great
25 feet is too narrow.
No
Yes! Great.
Flag lots with house retention is a good idea. Limiting the size of the house on the flag limits creativity. Perhaps 1500SQFT? A family won't want to live in 1000SQFT. Additionally, Design elements limit what can be built. You might as well provide the allowable plans that you want to see built. Let the architecture community create options for people to live in; don't mandate how a place needs to look. Times change and then you are stuck with the "Community Design Standards" to make every place look like identical, like a development on Florida.
support
This should be the requirement on R5 as well. The city does not need any more single-home lots.
Do not require more than one unit on 5,000 square foot lot.
BAD BAD BAD!!!!!! TO MUCH STUFFING!!!
Great
Perhaps incorporate solar protection requirements??
Do NOT reduce the minimum lot width! It should remain 36 feet!
Strongly support this.
Ok. How about 1500 sf for new house and regular height limit?
agree with these rules for new development, but do not agree with two units on one lot for established urban neighborhoods.
reduced lot width sounds good. minimum unit requirement sounds good flag lots sound good 3,000sq. ft. is not a small lot in an R2.5 zone. It seems like you're trying to make this pattern resemble an accessory structure. Given proposed FAR constraints and changes in base point measurements, this final proposal seems like it will discourage preservation -- typically an existing house is already small, so the result will be two small houses vs. two big (attached) houses on the same lot. It seems like one of these configurations is way, way more valuable than the other. Consider a 2,999 sq. ft. flag lot and a 2001 sq ft. existing house... the almost 3k sq. ft. in R2.5 is 2100 sq. ft of buildable floor area. This is a huge loss in house space!
great
I support this.
I don't like any of these. Maybe in a reduced 'a overlay', but not here.
Require at least 2 units on 5000 square foot lot. No! This is very concerning. Kind of unbelievable really.
Agree

Those flag lots are awful.
NO. Too much. Overcrowded. If we wanted to live in the center of a city we'd have bought a crappy condo in the Pearl.
Restrict size for small flag lots with new house to 1,250 square feet.
Please continue to keep SFR in R5 ZONES. Single ADU on a R lot acceptable.
Homes should fit the character of the neighborhood, and should include a garden and/or grass area. Keep all trees!!!
Minimum lot width should remain 36 feet.
No requirement to have more than one house on a 5000sqft property. No lot width less than 36'. Flag lots need their own parking space on the property.
See my first comment on FAR differences for lots under 5000 square feet. I also still don't like the trend of further differentiating R2.5 from R5. Also, I've always thought that if you can have multiple units on an R2.5 lot, you should be able to stack them, not be restricted to side-by-side options. And I think we need to hold a firmer line on minimum lot standards for R2.5.
Absolutely opposed to these
This is concerning to me to see the minimum requirements get smaller. We are already feeling the pain of cramped spaces in Portland, and this will just make it worse. Traffic is already a nightmare, and the narrow streets are sometimes cumbersome to get through. Added more dwellings on streets will just make the problem worse. Please do not do this to our city and those of us who pay high taxes to live here. These types of decisions are destroying what makes our city special. This will just increase our crime rate and drive away the people who actually contribute and make this place what it is. Stop trying to make Portland something it is not.
Maintain current lot widths and standards. Do not require additional housing.
This destroys current neighborhoods and incentivises the tear down of existing homes to build more units on a lot by developers.
narrow lots do not match this neighborhood. With no requirement for affordability this is not attractive to me.
Do not allow lots narrower than 36 feet. Period.
It's impossible to address the zoning rules above without addressing the whole concept of engineering an irrevocable transformation of the city at odds with its own goals of preserving the tree canopy and the historic character of Portland. I can't see the value of zoning changes without a mechanism for ensuring quality of design and materials and a plan for assessing the impacts on livability along the way.
This doesn't make sense. Why would a detached SFH be disallowed on an existing R2.5 lot with 25' or less of width, when with a land division the minimum lot width is 25' for a detached house? Or are only attached houses allowed on a land division with an existing? It isn't clear.
Reducing lot size and requiring 2 units will merely have the effect of causing a flight to the suburbs reminiscent of the 60s. 25 feet is too narrow. Flag lots are problematic and too expensive to adjust.
Bullet points 1-3: Fine. Bullet point 4: No exterior design elements in code. This makes for a discontinuous, piecemeal code that is arbitrary. 20 feet is too low, especially on sloping sites. 25 feet would allow for more flexibility.
On 5,000 sq ft lots, you should leave big homes. Stop tearing down existing structures that are in good order.
No! Our neighborhood is being destroyed (losing back yards, greenspace, trees, and places for neighbors to meet and socialize in public). These regulations will DESTROY community and livability. Veto.

This is a big issue. Add an exemption for flexibility if you divide your lot but maintain an existing grove of trees or open space. Offer conservation easements to encourage open space in areas that do not conform to the one mile park area.
NO!!!!
No. Upzoning is driving prices ever upward.
I can't understand all this, but I support us allowing more multi-family buildings in formerly single family neighborhoods. We are way past the time for this! NIMBY's are heartless and cold. We need more affordable housing now.
again, it's a really bad idea to 'require' a 5,000 sq.ft. lot to have two units. it's just wrong. flag lots and other configurations are fine as long as - again - the quality or feel or ambiance or character - whatever you want to call this invisible but important quality - of the neighborhood is not ruined.
Agree
Replace the R2.5 zone with a "cottage cluster" zone - Disallow parking in R2.5 zone - Allow for flag lots; do not limit size on flag lots
Flag lots come with huge issues like getting a fire truck into the property, trash collection, and determining who is responsible to maintain the road. Its also a challenge to get utility lines into the flag pole lot and then maintain them. In a city like portland homeless camping on flagpole will quickly become an issue
One small house per lot.
approve
All of this is crap, because you are doing a lot of things to allow further density to develop in Portland WITHOUT PROVIDING FOR ADDITIONAL RECREATIONAL SPACE. The City, through these efforts, is effectively degrading the livability of the community. Each time that additional residents are added to the community without providing additional recreational space within easy walking distance, the existing, already burdened, recreational spaces are inexorably overused and further damaged. By allowing for more density without providing the commensurate amenities which make any place worth living, you are doing nothing but enabling the creation of monstrous ugly and unwelcoming ghettos. In my estimation, this entire effort is garbage....nothing but a means of once more enriching the asset-holders while demeaning and degrading the general populace. The City of Portland planners are naught but the lickspittle minions of real estate developers intent on fucking up our community to line their pockets. Congratulations, you have alienated many and are effectively making this community one of the most 'unlivable' possible.
This seems fine to me - it seems like it's within the intent of a R2.5 zone. In otherwords, if there's a house on a double lot, it has to be redeveloped into two lots/houses, just like the rest of the neighborhood. Note the difference between this, and allowing many more houses on lots in R5 zones. One greatly changes a neighborhood (and potentially property values and property taxes) in such a way that a nearly 100 year old neighborhood would suddenly become much more dense and change it's character. The other just brings large lots into line with rest of a long standing neighborhood. Totally different.
Require green space instead of more houses. Where is the storm water going to go? With this, the City of Roses won't have any trees, much less roses.
The city blithely speaks of "lots" when it's really "homes" that you are talking about tearing down and replacing with twice as much bulk and vehicles.
I have a 9K sq. ft. lot. Would you then require me to build 2 units on it if it were bare? Hell no. Do not reduce lot widths as you'll then have greater density without infrastructure. "Potterville" comes to mind ...

this all makes good sense
Require two detached units
Yikes!!!! That would turn my neighborhood into something entirely different. To do that on my block, many large trees would have to be removed. Again, what about our urban forest and our livability?
There's a ton of incomprehensible jargon here, but I'm opposed to all of the eastside of Portland being rezoned to allow multiple dwellings. I want Eastmoreland to remain single dwellings or one house with an ADU on minimum size lots that reflect the current situation. It's wrong to do this to the whole eastside. Eastmoreland should not have to have big mansions on little lots, which is what it will become. It's not about affordability. It's about being beholden to developers.
Keep 36' minimum. Apply coverage same ratio as given above.
I've seen some of these flag lots. There's one near the Safeway on Barbur, off Capitol Hill Rd. Extremely ugly. Looks like a ready-made slum.
stop wiping out all of our green space in our yards, but all of the ugly infill options with ADUs. How do you think all the water is going to be absorbed?
No to all the above
I disagree with requiring 2 units. This means that lots that previously had only 1 house would now be forced to have 2, changing the character of the neighborhood. Not all lots in the R2.5 zone are suitable for additional units and not all lots in less-dense zones should be restricted from adding another unit. At the very least, there should be a clear process to seek a variance from these restrictions.
No. If there are currently homes on a 5K lot - a single home can be replaced on it.
Keep zoning as it currently stand!
Requiring 2 units for new development on all 5,000 sf lots might be pushing it.
Requiring two units on a 5000 square foot lot does not make sense to me when that is a "normal" size lot for Portland.
Can a flag lot have skinny access drive? What's the minimum width?
Create rules for small flag lots
1,000 sq ft lot!? You have got to be kidding me! That is not livable! Seriously, this is a massive change you're ramming through because it serves your social engineering fantasies.
I like these ideas
No on the divisions unless setback is increased. Require windows of houses not to be aligned with each other "same floorplans".
Okay.
I disagree with requiring that you put two units on a 5000 sf lot as sometimes people want a bigger plot of land. Can an ADU count as the second unit
disagree..
I work in a law library, and I can tell you from experience that flag lots lead to a host of disputes. I would not encourage them.
Skinny lots/houses look & feel awful in R5 zones. Don't over-urbanize Portland. If you have to accommodate more people, allow more high-rises in already urbanized areas. Don't make Portland like Atlanta or LA - keep scale and livability in mind. Our infrastructure can't keep up. Property taxes have already gone through the roof - leaving Portland becomes more of an option every year.
Cannot agree with smaller lots. Neighborhoods already congested. Asking for trouble when people are crowded into small spaces

OK
I don't like the first point, I think green and empty space is important. But I do like the two last points.
Minimum lot width should be changed to 35 or 34 feet, but not to 25 feet in land divisions. Flag lot proposal is ok.
Again, you are finding ways to squeeze in more homes, without considering infrastructure problems. Some 2 way streets just can't handle to volume that they now need to due to all of the infill in neighborhoods.
No requirement to build 2 units on 5000 sq ft lot. Ridiculous!
I support these changes. By way of explaining this and my other response, I should say that I believe Portland is in the midst of a severe housing crisis, especially at the low end of the income scale. Rents and housing prices have risen far above increases in wages, leaving more and more families, especially families of color, unable to afford a place to live. To rectify the problem, we need to increase the amount of housing across the city. We also need to increase the variety of housing. Too much of Portland is zoned for large single-family homes on big lots with space for lots of cars. The demographics have changed and the housing rules need to change with them. We can do that in a way that doesn't change the "character" of existing neighborhoods, if we limit the size of new homes. In fact, the new development, if done right, will make Portland a better place. The RIP is a great idea that hope will not be derailed by the elitist nimbies that want their neighborhood to stay the same, even while they enjoy the development elsewhere (e.g., the new shops and restaurants in Woodstock and on Division) and NOT elsewhere (i.e., outside at tight UGB).
I agree with and support all of these provisions.
25' wide minimum lots width is too small. Would be reasonable for encouraging increased density had it included design controls to insure appropriate and quality design.
And that is what you're calling an "improvement"? Requiring at least 2 units? No no no. That is the opposite of an improvement. That is a rotten, terrible idea. Joining that on the Terrible Idea List is your disingenuous proposal to reduce lot width to 25'. Honestly, you are really trying to change the face of Portland by decreasing lot size and pushing more and more housing closer and closer together. Whose idea was the "require at least two units"? I want to know against whom I must vote. I want that person out of office. The idea is outrageous, and whoever penned it is an adversary to reasonable Portland city planning.
NO NO NO! Who wrote these survey items, California developers? Why are the guardians of our city so anxious to sell our history and quality of life??
NO R2.5 LOTS!!!!
I especially support the top point. We need more houses, not bigger ones.
Reduce the lot width ONLY when dividing existing 50 ft wide lots. Do NOT support FLAG lot development. Visible from street and street frontage fabric provide harmony and promote safety with fire and police. Instead of adjust lot lines, either address this as detached on single lot with ADU or reclaim land for 'alley access' to preserve integrity of street grid with homes facing streets.
NO!
Requiring certain design elements is terrible policy. The city should never dictate style. NEVER. Stop saying one aesthetic is better than another. It is wrong and has nothing to do with the health or safety of the public. I also think all new housing should follow the same rules. No 1000sf area limits or 20' height limits. Just have one set of rules for all houses.
Horrible heavy handed government response to problems created by government. The individuals living in these neighborhoods should have security to keep what they have worked all there lives have.

Too much density
What is wrong with yards?? One dwelling on 2500 square feet in R2.5 zones. Do what the zone says.
Sounds okay.
1st provision is nonsense.
plenty of people are willing and able to develop these lots based on the current guidelines, no new regulations are needed to protect us.
No
1000 square feet is too small for a "house". I would accept 1,250.
No to land divisions! No to flag lots!
To the last point with small flag lots, instead of setting a maximum square foot size simply set an FAR ratio - this allows for the same type of constraint but customizes size for different sized flag lots.
support
not sure
A requirement for 2 units is insufficient. For large lots there should be a FAR-based policy and a requirement for minimum number of units (e.g. 3 for a 5000 square foot lot). I support all the proposed limits of housing size.
I support all this except the last point, limiting the new house to 1000sf. You are limiting opportunities for families at this size. It would be more appropriate to limit the size to between 1500 and 2000sf. That house will actually cost less per square foot than the 1000sf house and be more useful to more types of people than a 1000sf house.
I support this for R2.5 zones only; not for the Overlay zone in R5 areas.
No.
No!!!!!!!!!!!!!!
This is fine!
We do not support development of 'flag lots'. Our experience in Boulder, Colorado is that when flag lots are allowed, rear setbacks get sacrificed and neighbors end up with newly-developed houses looming over their backyards. Once again, this reduces solar and visual access and enhances negative impacts on neighboring properties.
Is this the city we want? No
OPPOSED! What constitutes "new" development? Decisions of this kind are already sloppy, for instance allowing virtually complete demolition and recording it as a remodel. Anything that encourages demolition of a viable, affordable single family dwelling and replacement with two unaffordable units that do not fit the existing neighborhood is shameful.
Will there be a shared driveway for the flag log? Or, how does the person/family living in the flag-lot-house access their dwelling?
no
As for first bullet point it depends on the context and existing neighborhood. The rest sounds good.
no upzoning
The biggest improvement you can make to the r 2.5 zone is to allow fourplexes to be built on each 2500 sf lot. Okay to the first three bullets.
Opposed--should not have a density requirement on 5,000 square foot lots. Opposed to reducing the min. lot width. Opposed to small flag lots. This is a developer give-away. Don't do it.
Strongly DISAGREE in some neighborhoods with idea of forcing increased density.
disagree with proposal entirely

The required 2 units should individually cost no more than the house they replaced.
These are not improvements.
Not in historic district
No. Cramming in more housing into tiny lots is not a solution. Why can't city planners work to create a more beautiful city, where quality of life is taken into consideration?
I did not move to Portland in the 1980s in order to live like a sardine. We need to be thoughtful about any new construction rather than letting greed and the interest of developers to prevail. I am sickened by what has been happening in SE/NE. My quality of life has gone downhill. The congestion is already too much at this point. Why not develop new, interesting communities including new hospitals, schools, etc that meet seismic standards and will like survive the earthquake, rather than cram way more people in a small area so that we won't stand a chance of getting out in an emergency?
No.
Don't know what flag lots are.
Increase minimum lot width to 40 feet.
NO! I currently live in a neighborhood where standard single family lots are 5000 sqft. I do NOT want multiple houses built on lots that were originally designed for single family homes. This is a single family home neighborhood.
No. We also want self sustaining gardens which are impossible with small lots
Good! The MORE housing units we require, the better!! We've GOT to *build* our way out of the housing shortage as quickly as possible. And we have an *immediate* need for TENS of thousands of ADUs!!
These are NOT improvements--they just chip away further at livability
No to all overcrowding. We aren't rats. Humans require room to breathe.
NO. This is astonishing. You are really trying to abolish existing neighborhoods and forbid new traditional subdivisions. I am so opposed to this that I would become political just to fight this. I am not a political person but you are making me into one with these awful zoning proposals.
Stop this messing with inner Portland's established neighborhoods. I do not want all of these housing permutations sprouting like fungi on every inch of land.
Allow four-plexes on each 2500 sq ft lot.
Eliminate minimum lot width, minimum lot area. Set the max FAR at 1.0 if you are afraid people will build too much housing during a housing shortage.
Two units on new development on 5,000 sq.ft. lots --yes! More housing. The second unit could be just a basement apartment.
Sounds good.
Flag lots are an inefficient use of space--it is more road, not more occupancy. Remove the ability to make a flag lot.
I support all of the above.
Sounds good, except, 1,000 sq ft is small! how about 1600 sq ft?
Disagree
minimum lot width 50 feet
NO, TOO MUCH DENSITY! You are ruining Portland.
Will setbacks be increased at the rear for flag lots? Consider what it may look like if you have back to back flag lots and the 20' high houses are only 10' from each other.

<p>I think there needs to be an exclusion for the two unit requirement when an existing structure is replaced. Think about it. You have an old, crumbling structure in a good neighborhood and the lot is 7,000. You have someone willing to take on the expense of demolition (expensive) to improve the property and you're going to force them to divide the lot? The neighbors would be happy to have a great new home go up, but less happy to have the lot divided. This rule will prevent many people from purchasing a home that needs to be replaced, which would improve the neighborhood. Many lots are not conducive to multiple units when the lot isn't that big. This sounds like developers wanting to force their plan on the city.</p>
<p>YES!! More flag lots and dividable lots. Let mid and small developers have full creativity regarding how FAR is achieved on awkward/different parcels. More duplexes, triplexes, and courtyards could also be explored by combining/dividing different lots strategically</p>
<p>yes!</p>
<p>I don't think you should require two units on &gt;5k sqft lots. If people want to buy extra land with just one house at a premium cost, let them.</p>
<p>good points to create more housing.</p>
<p>Generally agree.</p>
<p>If a person purchases a 50x100 lot in an R2.5 zone, the property owner should not be forced to build 2 units if they only desire to build one unit. Seems like a property rights infringement. I fully support bullet #3, allowing property lines to be adjusted to create flag lots when a house is retained.</p>
<p>Small flag lots should only have small houses. The minimum lot width should be at least 36 feet.</p>
<p>Please add "current" in the first bullet. To read Require at least two units when a new development is proposed on a 5,000-square-foot lot or larger in a "current" R2.5 zone.</p>
<p>Requiring 2 units on a 5000+ sqft lot is a terrible idea! This means no single family household would have a yard larger than 4999 sqft. That's not that big of a yard! Again, stop forcing families to move out of the city. People want yards for their children; let them have yards! Not everyone wants to live on top of each other. Let them have yards! Off street Parking should be required for all houses, regardless of lot size. I do support limiting the size of houses on small flag lots. Portland is starting to look like a Monopoly board with all the random ADUs popping up in people's backyards. What an eyesore.</p>
<p>yes.</p>
<p>1-3 are good ideas. Less sure about 4.</p>
<p>Agree</p>
<p>OK</p>
<p>I live in a 100+ year old home. Under the current plan you would require me to either pay an exorbitant amount to demolish subdivide and rebuild two similar sized homes, limit what I can add on to house my family of 6 (currently living in 1200sq ft), and limit what I can add as an accessory unit to store our cars and belongs which will not fit in our smaller home. This plan seems biased away from home ownership and will largely contribute to a rental community in what is one of portland oldest family oriented communities.</p>
<p>Support a healthy urban tree canopy by designing flexible code provisions that incentivize saving trees and creating less impervious surface.</p>
<ul style="list-style-type: none"> <li>• Adding smaller houses to lots that already have average-sized houses will bring down the property value of the neighborhood.</li> <li>• Adding housing without requiring adequate additional off-street parking to areas that already have narrow, poorly maintained streets that lack sidewalks will increase the risk of human-automobile interactions.</li> <li>• Expecting that the additional population will not own, park, or drive cars is unrealistic.</li> <li>• Expecting that the additional population will increase ridership on</li> </ul>

<p>public transportation without adding sidewalks on the roads leading to the bus stop is unrealistic. • In the long run, the estimated tax base will decrease, not increase, due to the devalued property values. • The increased requirement for utilities and infrastructure maintenance as a result of the increased population will also significantly impact any estimated tax revenue. • A more sensible approach would be to limit the number of multifamily dwellings per some area of land, for example, no more than 2 or 3 duplexes per block of single-family dwellings, and no more than 1 triplex per block of single-family dwellings.</p>
<p>1000 Sq ft is too small, 1500 and a height to match is reasonable.</p>
<p>#4</p>
<p>Please do not create new rules for small flag lots.</p>
<p>This mandate for density is the most onerous of all RIP requirements as it essentially guarantees that single-family detached houses will all eventually be replaced by duplexes or worse. In addition, any new detached houses will have to be tiny. Neighborhood associations desired a house size limit because of the scale of their existing neighborhoods of bungalows, but this RIP requirement will by definition doom all of these single-family detached residences by zoning them out of existence. How will this be done? Flag lots throughout the city. So, not if--when--a small bungalow is razed, developers will have no choice but to build TWO in its place with a flag lot behind the one facing the street. The potential for neighborhood disputes with these island lots all over the city, not to mention the nightmarish situation with utilities and access to the street caused by the new restriction can well be imagined. What property owner wants a home bounded on ALL SIDES by other houses in the middle of a residential block? No privacy, very little sun or fresh air, and a huge potential for crime and fire. Who seriously thought up this requirement other than a developer or an office worker with no grasp of real-world issues?</p>
<p>Again, this is an invite to demolition of our most affordable housing stock. Shame on you all for taking aim at it. City Council voted this DOWN.</p>
<p>Don't shrink lots, but have greenery, trees, gardens put in the yards. We need requirements for more trees and garden space. I don't want to live in LA.</p>
<p>Strict requirements need to be created, maintained and followed.</p>
<p>Stop requiring any minimums! Let demand and good builders dictate minimums</p>
<p>I support.</p>
<p>Again, way too timid. Need to provide way for owners to consider other alternatives to narrow houses.</p>
<p>This only benefits builders, not the residents. A recall will ensue. Seriously.</p>
<p>Requiring 2 units on a 5000+ sq foot lot is going to destroy green space within the city. There is already so much incentive to redevelop.</p>
<p>yes</p>
<p>Why should flag lot house have to match original house? there are many parts of town where original house is nothing special aesthetically, and a new small house in back could look much nicer with more options</p>
<p>The first three do not look like improvements. Do not require two units, maybe someone wants a garden. Do not reduce the size of the lot width. Do not create small flag lots. Flag lots are not a good use of land.</p>
<p>The City should not require two units be built on a 5,000 sq ft lot. Homeowners already can add an ADU to their property, they should not be required to turn their land into skinny lots or tiny lots. The minimum lot width should not be reduced. The City should not be encouraging smaller and smaller lots.</p>

see comment #9
no rip, it's racist
These restrictions are driving up the cost of development.
I support bullets 1-3 and am neutral on bullet 4, Create rules for small flag lots that restrict the size of the new house to 1,000 square feet and the height to 20 feet, and require exterior design elements.
I strongly disagree with the requirement of building at least two units for new development on a 5,000 sq. foot lot. If a lot is 10,000 square feet or more, then yes, it would be wise to require more than one unit. I support the idea of restricting the size of a new house to 1,000 square feet and the height to 20 feet as well as requiring exterior design elements for any small lot smaller than 5,000 sq feet. However, there should also be a MINIMUM size home--preferably > 500-750 square feet in order to create long-term livability for tenants. I don't support the idea of creating small flag lots.
do not reduce min lot width. Do not allow property line to be adjusted to create small flag lots.
No opinion
Why not just bulldoze the west side of Portland and make 'trailer pods', like food cart 'pods'. Envision acres and acres of 'tiny houses', RV's, 5th wheels and Campers with common 'community' areas filled with 'pallet' furniture between them. In existing R5 zones there are plenty of areas for rats, racoons, opossums and coyotes to thrive in. Imagine the wild life opportunities!
NO!! Wake up, this would be disaster. Adjust property lines to suit developers? Have we gone off the deep end? Tiny houses are the only part of this that makes any sense whatsoever.
I would like to see flag lot homes not limited to 1000 sqft
Do not change our zoning
Opposed. Maintain historical character of neighborhoods. NO MORE LOT SPLITTING.
Disagree with last bullet point. Rest is OK
Sure, why not.
I support the density provision to requires two units or more on 5,000 sq ft lots or larger. The reduction of minimum lot width from 36 to 25 feet is really important for encouraging density.
Enabling existing houses to be kept is important. I'm already concerned about additional demos of perfectly good houses. The new flag lot options sound basically like a way to create an ADU on a separate lot, which is what people want.
That seems really developer driven! What if you only have money for one? Can you just leave room for a second later? I really don't enjoy my 5' dark setback next to my neighbor's tall skinny, ugly, already falling apart house. Lots more dark useless land between developments.
20 feet is far to high on lots this size, it clutters the existing rooflines, and further erid3s the historic facade and looks of our neighborhoods.
These guidelines seem to be the most confusing and complex and it is hard to see who will be impacted or how. But it does seem like making two units where there was one unit will be Very Attractive to developers who may be quick to find these opportunities and offer cash to current homeowners.
Do not encourage r2.5. They are destroying community, and not to mention, driving up property values in the area. It's gentrification.
Support!
25 foot flag lot heights
25 feet is too small. NO
I support these proposals.
Please no.

Won't this increase tear downs?
NO NO NO do NOT require 2 units when new development is proposed! Don't reduce minimum lot size.
No. Do not require two units! No not reduce the minimum lot size. No on these changes. Again, it will affect the existing neighborhood amenities that need to be protected.
No!!!!!!!!!!
If my house is destroyed by fire, earthquaje, etc, this would require me to build two houses. Current infill is ugly, out of character and out of scale. And, I have yet to see new construction that is less than double the cost of the destroyed house. This will NOT provide the so-called missing middle housing, but instead ratchets up prices even more.
i am vehemently against all of these rules. i do not want more housing. just because you have a 'stake holder' group, filled with affordable housing types and builders, and other such advocates, doesn't mean the people who live in these neighborhoods support these "improvements". what type of comment survey is this , when you prejudge and say "make improvements". why don't you say "make degradations"
Opposed, because of provision 9 to rezone entire neighborhoods. This is nothing but redevelopment by another name.
No. This is destroying neighborhoods.
Flexibility to develop and grow. Provide a fair playing field and get out of the way.
I wouldn't support requiring more units to be built in any case.
Yes, and create incentives to encourage a third unit. If larger than 5,000 sq. ft., allow additional units. I support restricting the size.
OK
Yes, require density whenever possible. Just allow small flag lots to build big houses.
There is no reason to increase housing density so far away from the suburban job sprawl jobs.
Density is good. Increase R2.5 density to 6 - 8 units.
The RIP violates the purpose of the zoning code, which is to provide stability and predictability to neighborhoods and the development process. • With the "housing opportunity overlay zone" the R5 zone becomes more dense than the existing R2 zone. The R2.5 zone becomes more dense than the R1 zone. • A potential triplex on every lot is a multi-family zone by definition and erases the purpose and intent of single-family zoning. The credibility of the code (along with civic leadership) is lost as is the expectation for stability when every home sale becomes a potential teardown.
I really like the changes here, but would suggest these also apply to R5. Or, better yet, substantially reduce the R5 zoning.
I support this change except requiring exterior design elements for small flag lot homes. This goes too far in limiting homeowners rights.
Not all lots are equal, especially with some slopes we see in PDX and two units required on those lots creates an undue hardship.
Thanks for requiring multiple units.
No comment.
Love all these ideas except the last one.. again, why restrict and therefore limit the potential of any available lots we have left. I don't understand this logic. Unless you're going to significantly reduce the cost of permits, I don't see a lot of these developments occurring because they do not make economic sense, they wouldn't pencil out.

No. People will still like a single-family home on a standard size lot in the city. If they can't find it here, the suburbs will explode when the young workforce ages and decide to raise a family. People need green space, gardens, trees and recreational space.
Disagree with 1st bullet - this should not be a requirement, but optional at owner's discretion. Agree with rest
So in other criteria suggestions drive design elements like set backs and eaves etc, but then this proposal will allow keeping existing house and adding new now behind it. Allowing small flag lots will probably be the worst visual impact if allowed. Most flag lot owners want privacy from front lot and vice versa which would result in lots of fencing and screening around front house. This could look really odd on small sites. Flag lots generally work best on larger sites
No
I am opposed to this change.
This could create huge incentives for demolition of historic homes. I am not supportive of these changes. There need to be stronger incentives to preserve older/historic/affordable homes.
I like each of these policies, except for the last one. Limiting the new house on the small flag lot to 1,000 square feet is too restrictive. I am curious how the implementation for requiring exterior design elements would work. If it causes applications to become bogged down, nobody will ever do it, which is an undesirable scenario. That said, it seems reasonable that certain exterior design elements could be required with minimal staff time expended for reviewing these elements. 20 feet height limit is good.
NO to the first bullet. This is way overstepping good governance. Create incentives to encourage that option but do NOT require it.
Do not require multiple units on 5000 square-foot lots when there is new development. Add dwelling units, instead, through additional attached ADUs in existing structures.
Disagree with two-unit requirement Disagree with minimum lot width
What about a house and an ADU on 5000 sf? That is 2 units. Or aren't you counting ADU's as a unit? If not, then you shouldn't be pushing them as a means to provide for Portland's housing shortage. Maintain setbacks for new lots and structures otherwise you're just going to create livability and other problems.
Allow all of this, and don't let Amanda Fritz's dislike of skinny houses and interesting options be enough reason to deny potentially THOUSANDS of new housing units that could be built within accessible neighborhoods.

# Appendix B: Emails and Letters from Individuals

During the public comment period, staff received 249 emails and letters received as attachments via email, in addition to seven paper letters received via mail. All emails and letters from individuals are shown verbatim here. No edits were made, but personal information was redacted.

## Emails

The 249 emails and letters received via emails staff received from individuals are shown here in order of date received.

10/05	<p>Dear BPS:</p> <p>Does the 'a' overlay contain a range? It looks like the 1/4 mile map to me. 1/4 mile is about 6.6 Portland blocks. This map covers everything that is within "1/4 mile of a city center/ frequent bus line/ area of people vulnerable to displacement etc. "</p> <p>What would the map look like if it used 1/8 of a mile from just the city centers? (that would be within 3.3 blocks of a city center.) Or 2 blocks from a city center. Or 1 block from the city center.</p> <p>To make the City Center idea work people need to be able to walk to the city centers then walk around within them.</p> <p>What we are being offered seems like one version without any other options. The 'a' overlay covers most all of the residential land in Portland. The city centers are most of the land that is not addressed. It looks like if you take out the city centers, parks, graveyards, schools that 95% of the land is under the 'a' overlay. Why are you not just changing the zoning code?</p>
10/10	<p>RIP Staff,</p> <p>Page 25 of the RIP Staff report (<a href="https://www.portlandoregon.gov/bps/article/657688">https://www.portlandoregon.gov/bps/article/657688</a>) reads:</p> <p>"First, the Tree Code already requires that one-third of 12-inch diameter and larger trees be preserved for each lot."</p> <p>This is not an accurate portrayal of the tree code. There is not a requirement in Title 11 that trees be preserved.</p> <p>This section could be made accurate if it read something like "First, the Tree Code has a preservation standard for retaining one-third of 12-inch diameter and larger trees on sites</p>

	<p>5,000 square feet or larger with the option to pay in-lieu to remove the trees and a fee-in-lieu exemptions for some affordable housing."</p> <p>I strongly urge staff change to this language in their report along these lines. The existing language inaccurately and creates a lot distrust towards the City.</p> <p>Sincerely,</p> <p>N. Vancouver, Portland, OR 97217</p>
10/17	<p>Hello,</p> <p>My name is [redacted]. I am a homeowner in SE Portland within the Mt. Scott-Arleta neighborhood. I am writing today with a very particular comment related to the Residential Infill Project and zoning codes. The 10 feet setbacks currently in place with the R2.5 and R5 zones must be retained. If we are to overcome the current housing crisis, we as a city must facilitate flexibility in land use towards housing solutions. By requiring an additional five feet of front yard space be dedicated to landscaping and not housing we are failing the community. Front yards do not facilitate the connected, open neighborhoods that Portland is known for but rather encourage wasteful landscaping, private retreat from the public road, and a missed opportunity to allocated more backyard space towards ADUs, tiny homes, and other possible housing solutions.</p> <p>Keep the setback for R2.5 and R5 zones to ten feet. So that all streets can contribute toward overcoming the housing crisis and not just arterials and transit lines.</p> <p>At the very least, permit new development to be set at 10 feet if *any* existing property on the plot, and not just adjacent, is at 10 feet setback or less. We must plan for the future and avoid to overcome past mistakes in urban planning.</p> <p>Thank You,</p> <p>SE Woodstock Blvd., Portland, Oregon 97206</p>
10/19	<p>My husband &amp; I have been residents of the Collingsview neighborhood for forty nine years. We would be classified as "older generation" living in a single dwelling home. We are concerned about the intention to change zoning in Portland in order to attain the concept of high density in neighborhoods. It is appears that this is being done without a full legislative process which would include in depth public opinion and hearings. We understand the need to help increase the housing density in Portland in order that we meet future growth.</p> <p>However we feel that it must be done slowly and with opinions of those who will be the most affected. If you plan to increase multiple dwellings on properties and/or reduce lot size zoning the impact on those of us already settled here must be a priority. More housing means more cars on streets already overwhelmed with daily traffic. It means green space to accommodate more sidewalks, sewer, &amp; streets. We are not adverse to growth in our neighborhood, there is room for more people to come and share what is here and raise their families as we have. But we would like it to be a more carefully considered and researched more than it seems to be at this time. We would encourage that you make no decision on the part of the proposal at this time until there is a full legislative process including</p>

	<p>Amendments to the Comprehensive Plan needed to change the Zoning Map Designations and zoning. Thank you for the opportunity to express our feelings on this matter.</p> <p>Respectfully,</p> <p>SW 4th Avenue, Portland, Oregon 97219</p> <p>[signed by two individuals]</p>
<p>10/19</p>	<p>Mayor Hales and Commissioners:</p> <p>Of particular concern are recommendations 4, 5, and 6 under “Housing Choice”. These provisions would potentially turn single family dwelling zones from R5 to R20 into the equivalent of High Density Residential through the use of an overlay. This should not be approved, even as a concept, without a full legislative process including public outreach and hearings.</p> <p>Among our reasons,</p> <ul style="list-style-type: none"> <li>• Once City Council has approved this in concept it will be largely pre decided.</li> <li>• The present proposal has evolved to envision a much greater density than the recently approved Comprehensive Plan. That stated: “Apply zoning that would allow this within a quarter mile of designated centers ... and within the inner ring around the Central City” (amendment #P45).</li> </ul> <ol style="list-style-type: none"> <li>1. As of October, it extended the “Cottage Cluster” concept to “Citywide”.</li> <li>2. At the City Council briefing on November 1, the staff seemed to also envision duplexes and triplexes in the R5-R7 zones citywide.</li> <li>3. An R5 or R7 lot could have up to 4 housing units counting an ADU with each duplex unit and up to 6 on corner lots.</li> <li>4. An R10 lot could have about 8-10 units with “cottages” and ADUs and an R20 lot could have twice as many.</li> </ol> <ul style="list-style-type: none"> <li>• This is likely to invite redevelopment into small apartment-like or motel-like complexes with short term rentals. Since there is no provision to divide the lots, there would be little likelihood of providing ownership opportunities for less affluent Portlanders.</li> <li>• This would completely change the character of single dwelling neighborhoods.</li> <li>• It would be inconsistent with the Comprehensive Plan Zoning Designations and the zone descriptions in Goal 10.1, paragraphs 3-7, Goal 10.3c regarding the method of making zoning changes, and Figure 10-1 regarding called zone changes.</li> <li>• Amendment #P45 also contemplates using zoning (not overlays).</li> </ul>

- The added housing capacity is not needed to accommodate growth expected over the life of the Comprehensive Plan according to the staff at the Nov. 1 briefing.

We urge you to make no decision on this part of the proposal until there is a full legislative process including Amendments to the Comprehensive Plan needed to change the Zoning Map designations and zoning.

Respectfully submitted

Collins view residents and homeowners - Brugger St.

[signed by two individuals]

10/21

Morgan:

Thank you for the presentation on Tuesday to the SWNI Land Use Committee.

I have three preliminary technical observations about the proposal (without going into whether as a whole increasing density in single family zones it is the right direction for Portland):

- 1) The proposal should be divided into its primary components for presentation and consideration; scale of houses, residential density increases (not "housing opportunity", and narrow lots. The proposals are not interdependent and mixing them together is sort of like making a large salad of grape jello and sauerkraut-indigestible.
- 2) What works in one neighborhood is a mistake in others. Uniform setback requirements, for example, may be a great idea in the street grid areas of SE Portland, but they don't make sense (and inhibit attractive design options) when applied to the hills and woods of SW Portland. If greater density works for some neighborhoods, it may not work for others where it results in loss of large trees and valued greenspace (public and private). There are too many such examples in the proposal to count. One of the great things about Portland is the diverse character of its neighborhoods. But this also means that one size does not fit all. The project needs to reflect this. Is neighborhood-by-neighborhood planning rather than a city-wide approach too difficult?
- 3) Your project may get everything right, but like the Better Housing by Design project and the disaster that is Portland's no parking" apartment construction, this project will be a failure if it does not deal with parking and traffic. Whether they use transit or not, people have cars, and good planning includes providing adequate vehicle access, control and parking. Left unchecked, vehicle congestion ruins neighborhoods. Don't make our already bad situations worse.

Thank you for considering these comments.

I look forward to seeing you going forward.

<p>10/21</p>	<p>As a resident of Portland for 77 years, I strongly favor the Residential Infill Proposal for the following reasons:</p> <ol style="list-style-type: none"> <li>1. Current zoning codes encourage the building of homes that are too large for the small households we have today. <ol style="list-style-type: none"> <li>a. This practice is not ecologically sustainable. Earth's resources are finite. We can't continue the use so many resources for building homes.</li> <li>b. This practice is inequitable. Only the wealthy can afford to live in the large homes.</li> <li>c. Homelessness is rampant because not enough smaller, less expensive living arrangements are allowed. I believe that zoning changes will have a more significant beneficial effect than all the other measures the city and county are taking.</li> </ol> </li> <li>2. Current zoning codes also result in too many demolitions of old homes, which should not be encouraged for the same reasons as listed in a and c above.</li> </ol> <p>I particularly favor the following:</p> <ol style="list-style-type: none"> <li>1. Reduce the size of houses based on lot size and zone. In the city's R5 zone, I agree that the cap should be 1/2 the square footage of the lot underneath: 2,500 for a standard 5,000-square-foot lot.</li> <li>2. Allow more housing types in select overlay zone areas and increase flexibility for cottage clusters on large lot citywide. We should be encouraging duplexes, triplexes, and clustered cottages to increase the total number of homes in the urban area and provide smaller, less expensive options.</li> <li>3. Apply a Housing Opportunity Overlay Zone in areas with good access to services, jobs and transportation options and other amenities. It makes sense to allow missing middle homes close to amenities such as services and transit lines. The more people who don't need to use cars, the better. My family chose to live in Hillsdale, where I can walk or bike to meet almost all my needs.</li> </ol>
<p>10/25</p>	<p>I would like to know why you're fast-tracking re-zoning of my neighborhood and why you chose to only propose re-zoning the stretches of Roseway with the smallest and cheapest homes? If you're going to force this through, it should also apply to the wealthy areas of Roseway, such as the massive lots near the ridge. I think it's interesting--and also quite predictable--that you exempted the wealthiest of our neighbors from the misery of this type of rezoning.</p> <p>Why not redevelop Rose City Golf Course for your high density development instead? Oh, wait, the golf course is a service for wealthy people, which is all city planners care about. (And, yes, I worked for the City and I saw this firsthand--it's shameful.)</p> <p>Have you actually talked to anyone who lives in these areas? Do they want this? Because I live here and people in my stretch of Roseway are horrified that you're forcing this through and have many questions about it.</p> <p>You should really be ashamed of yourself for forcing this through without any community engagement and with decisions that were most clearly with an eye to the neighbors that are least able to stand up for themselves.</p>

	Thank you,
10/25	<p>Dear Infill Project Coordinators,</p> <p>Please make the people who own homes currently and are residents of Portland now your priority!!!! We could have a crisis on our hands when the development bubble bursts.</p> <p>Currently there is so much development in Sellwood that our neighborhood is changing without thought to infrastructure, character, our schools, petty traffic and pot holes, and parking.</p> <p>My home is losing value as is my way of life with our little area unable to withstand so many apartment buildings. Many of these with for lease signs going unfilled. The developers will make their profit and leave and we are the ones who make this a wonderful place to live not them. Listen to us we live and work here. Those people may not come!!!</p> <p>There are not enough jobs to pay for the rent on all this housing. The quality of life and the quality of our schools will impact whether people will end up coming in the first place. The city is over run with homeless issues petty crime, and traffic. Development is only going to exasperate these problems.</p> <p>Please say no to duplexes in single family zones, and triplexes.</p> <p>Respect our past and the character of our neighborhoods. Give incentives for restoration. That is what will lead to stable growth. Build value not apartment boxes.</p> <p>Sellwood Resident</p>
10/26	<p>Hello Todd,</p> <p>Thank you very much for writing back to me. I trust that everyone involved in the BPS feels that they are doing what's best for Portland, and I truly appreciate the time you gave me last Monday evening at the Drop-In session at CNN. As I believe I mentioned, I was able to take early retirement from my position on the faculty at Indiana University and relocate to Portland four-and-a-half years ago. My entire family now lives in the Pacific NW. I choose to be an actively engaged citizen, and since I live in an area being directly impacted by the proposed zoning changes recommended in the RIP, please allow me to ask you the following questions, which focus mainly on the proposed rezoning of historically platted skinny lots from R5 to R2.5.</p> <p>Given the Portland City Council's 2016 direction on the RIP at the final December 2016 hearing, where the record states, "Council did not approve staff's recommendation to rezone historically narrow lots currently R5 zones to R2.5....Instead, Commissioners voted for an amendment that would not allow individual R5-zoned historically narrow lots to be developed – even when they have been vacant for more than five years, as presently allowed," what gives the BPS the authority to proceed with the RIP, which neighborhoods like mine (Rose City Park) feel will be destructive and divisive and spur demolition of existing houses by developers? Put quite simply, how can the BPS proceed given what seems to me to be a crystal-clear decision by Council not to approve?</p>

	<p>I hope you and the others on the BPS understand that the RIP not only promotes inconsistent zoning rules (spot zoning, which at best seems arbitrary) but also encourages the demolition of existing homes in our neighborhoods. Didn't the Council during its December 2016 meeting strongly advocate the idea of encouraging "internal conversions over demolition"? Please correct me if I'm wrong, but doesn't a council have authority over a bureau?</p> <p>Let me strongly assert that neighborhoods like Rose City Park make Portland the great, unique city that it is. This idea was resoundingly echoed at a meeting last Tuesday evening of the Rose City Park Neighborhood Association, held at the German-American Society. Dozens of residents turned out to voice their opposition to the RIP. Several mentioned that we seem to following the foolish path taken by our neighbor to the north, Seattle, when it up-zoned the once-beautiful and thriving neighborhood of Ballard. Is Portland trying to become another (unlivable) Seattle, or are the same forces that are ruining Seattle now doing their best to influence Portland's urban planning? Allow me to suggest that you, and others in BPS, view the following documentary discussion about that rezoning decision, "The False Promise of Up-Zoning Reform." (You might remember that we discussed the film briefly when we met.) A link is below.</p> <p><a href="https://www.youtube.com/watch?v=Jex02iV52pM&amp;sns=em">https://www.youtube.com/watch?v=Jex02iV52pM&amp;sns=em</a></p> <p>So, given all of the above, I find myself confused. On the one hand we have recommendations from the City Council, and on the other we have the RIP proposals. And to the side, when we look to the north, we see the devastating results of a city's rezoning decision that resulted in the destruction of a neighborhood.</p> <p>Again, let me thank you for taking the time to consider my questions and concerns. I am certain that we both care deeply about Portland and its future. I write to you with the hope that all of us can continue to work in Portland's ultimate best interests.</p> <p>All best wishes,</p> <p>NE 60<sup>th</sup> Avenue, Portland, Oregon 97213</p>
10/27	<p>I am generally in support of the RIP, but I have very serious concerns about the potential for a visual change in the character of our neighborhoods.</p> <p>You share this concern, I know, or would not have done so much to reduce the size of these huge houses going in. But, I am not seeing recognition that modern rectangles with angled rooves or skinny houses that are boxes on stilts will be discriminated against. If I just missed this, thank you and ignore my comments. If I did not miss it and this is not been addressed, I would ask that something be done to disallow such designs.</p> <p>Thank you for receiving my input.</p>
10/30	<p>To: Morgan Tracy</p> <p>I have not been able to reach you by phone. I will keep trying.</p>

Here is my testimony/comments for the RIP project as it pertains to my dead end block of SE Henry Street. This dead end block should be ineligible for the Housing Opportunity Overlay because it does not meet the Fire Code or the Right of Way Code for the City of Portland.

There is a 7 foot fence blocking the dead end, which many residents, including myself, cannot climb to escape an emergency situation like a gas leak. We already have duplexes, triplexes, fourplexes, and flag lots on this street. We are crowded. There is no turnaround. How many more people do you want to cram into this street and create a bigger potential public safety situation?

Please see my attached comments that outline the Code Provisions that are applicable. I have also included signatures from 15 residents of this street to support my position that it is not safe to add more density here. Please call me at 775-233-1165 to discuss this.

The City Council agreed with me last time during the Comprehensive Plan debate, that this street should not have more density. Let's take care of this so I don't have to bother Council Staff again with this minor issue.

[From attachment (signed by 15 individuals):]

Dead end streets are inherently dangerous. That is why the RIP Housing Opportunity Overlay will not be appropriate for some dead end streets like mine on SE Henry Street, just east of SE 52nd (from 5208 to 5433 SE Henry St). I live at [redacted] SE Henry.

Imagine a night club with its fire exits blocked. Because there is only one exit, people could be trapped in case of a fire or gun assault. Now imagine sending the Fire Marshal into that building to say, "Sure you can put more people in here every night. We can increase the occupancy limit. No problem. Public safety doesn't matter." That would be irresponsible. Who would think of doing that?

For the same reason, my dead end street should be exempt from the RIP Housing Opportunity Overlay. In the case of a fire, gas leak, or police incident that demanded evacuation, people could get trapped. How many people that might need rescue should be added to this street? None, for the following reasons:

- There is a 7 foot fence blocking the dead end. I cannot climb it to escape. I would need rescue.
- It does not meet Fire Code or the Right of Way Code (33.654.120). It doesn't have a turnaround.
- At 475 feet, it is longer than recommended for a dead end street. (33.654.110 B:2)
- It already has almost twice the number of living units that it should have. (33.654.110 B:2)
- Adding the overlay could potentially increase that to three times the number of living units that is recommended.

Most of the homeowners on this street have signed a petition opposing the RIP proposals. I have the signatures of 15 people who know it would not be safe to add more people here (see attached). We already have 3 duplexes, 1 triplex, 2 four-plexes, and 3 flag lots on top of 10 regular single family lots. We are packed.

We already fought this same fight during the Comprehensive Plan, when Planning Staff wanted to upzone the R-5 lots on this street to R-2.5 to increase density. The City Council gave us an amendment so we would not be upzoned because they understood that public safety cannot be ignored and neither can the Portland City Code. Now we have to fight this all over again, but I don't think the City wants to reverse itself on a decision it made just a year ago.

Here are the specific ways our street does not meet the Code:

- We don't have a fire apparatus turnaround that is required in the Fire Code for streets over 300 feet. Our street is 475 feet.
- We don't have a turnaround per Section of the 33.654.120, either. We don't meet any conditions of this section. That section requires:

3. Standards for turnarounds.

a. When a turnaround is required. A turnaround is required on a dead-end street in the following situations:

- 1) The street will serve 4 or more lots;
- 2) The street is at least 300 feet long; or
- 3) When required by the City Engineer, the Fire Bureau, or BDS.

- We don't meet the recommendations for street length and number of living units in 33.654.110 B:2. We have 20 living units. The Housing Opportunity Overlay could potentially increase that to 56 living units:

2. Dead-end streets in OS, R, C, and E zones. In OS, R, C, and E zones, dead-end streets may be provided where through streets are not required. Dead-end streets should generally not exceed 200 feet in length, and should generally not serve more than 18 dwelling units. Public dead-end streets should generally be at least 200 feet apart.

Planning staff has exempted lots on steep slopes and lots with fire hazards. It has also exempted lots with roads that do not have adequate infrastructure improvements and/or are not maintained by the City of Portland. My dead end street must be exempted as well. We have inadequate infrastructure (no turnaround) and don't meet code. There are two ways to handle this:

- You could just exempt my dead end block from the map.

- You could make ineligible in the code those dead end streets that don't meet the Fire Code, or 33.654.120, or 33.654.110 B:2. At the very least, a street should have adequate turnaround to be able to be eligible for the Housing Opportunity Overlay.

Please use common sense here. There is no reason to allow more density on this section of SE Henry Street. It is not safe or wise to do so. I am sure that the City Commissioners do not want to spend their time dealing with this again. The City Council would not want to face the repercussions of having a gas explosion on this block and more people dying because the Council had approved greater density.

The International Building Code, Oregon State Code, even Portland's own Code recognizes that dead end streets present a public safety hazard and should be treated differently in the code. People all over the world understand the danger of dead end streets. Please recognize the significance of this. Please exempt SE Henry Street from the RIP Housing Opportunity Overlay.

We do not support the Residential Infill concept at this point. It does restrict the size of new homes, but it encourages demolitions and threatens to alter the character of single family RS neighborhoods, essentially designating them R2.5 without going through the zoning process. Though smaller scale housing is important, there needs to be a mechanism that will restrict the influx of duplexes and triplexes so they don't overwhelm whole blocks (some is good, too much is bad). There is no such mechanism in this set of proposals.

Our block, SE Henry Street just east of 52nd, is a perfect example of how this proposal can go wrong. We already have 3 duplexes, 2 fourplexes, 1 triplex, and 3 flag lots. That should be enough, and the City Council agreed, voting last spring to not rezone the remaining RS lots on this block to R2.5 because it would increase density on a dead end street that does not meet the fire code and only has one way out. This set of proposals would overturn that decision according to the conceptual map, adding the potential for 26 more living units on this block on top of the 30 already built for a total of 56 (18 units are recommended for dead end streets, 33.654.110.B). There is nothing in the proposal to guard against adding too much density to this block or any other block in the City being considered for this indirect rezoning effort.

10/31

Hi RIP Team,

Please find the attached public comment.

Thanks for your critical efforts!!

Best wishes,

[From attachment:]

Dear Residential Infill Project Team,

I'm writing to comment on the October 2017 proposed draft Zoning Code Amendments. This draft is a great step forward, synthesizing the goals of preserving Portland's charm for the future and getting more units on our market facing a shortage of housing.

	<p>My wife Amber and I own a 1922 English cottage stucco house (1200sf) that has a detached garage.</p> <p>The house [address removed] is on the corner of SE 21st and Bybee (just a couple minutes' walk to the Bybee MAX station). The house faces 21st Ave while the garage faces Bybee. We would like tear down the detached garage and build a tasteful duplex in its place. We believe this will both preserve our historic home for the future by increasing the overall value of the property and offer two families affordable homes, fulfilling the twin aims of RIP.</p> <p>We suggest the following changes to your proposal to make sure that projects like ours can get done:</p> <ol style="list-style-type: none"> <li>1) Adopt a rule for automatic inclusion on the Historic Resource Inventory. Given the esthetic value of various building periods, use 1950 as a cutoff: anything prior gets inclusion on the HRI.</li> <li>2) Allow ADUs separate from the house to be attached to each other (ADU duplex).</li> <li>3) Allow larger ADUs, to the maximum lot allowed square footage, as a historic preservation bonus.</li> <li>4) Keep the SDC waiver for 2nd ADUs, as a historic preservation bonus.</li> <li>5) Apply SDC to demolitions of houses on pre 1950 houses if the new construction does not create more units than the demolished structure.</li> <li>6) Close the two wall loophole for pre 1950 houses, where effective demolitions are not treated as such.</li> </ol> <p>We believe this will create the right kind of incentives to be creative with historic preservation and to provide more units for our growing population and young families.</p> <p>Thanks for your consideration of these suggestions! Warm wishes,</p>
10/31	<p>Thanks so much for the full answer! And...</p> <p>I guess my comments then include a request for some kind of a aesthetic guidelines. I appreciate the attention to form, but square boxes on stilts with garages dominating are just ugly detractions to a neighborhood of cozy little bungalows.</p> <p>IMHO :)</p> <p>Still, I would appreciate my comments being included in the documentation.</p>
11/02	<p>Hello! I am writing to request that the committee please consider including a cottage zoning option in the rules. My understanding is that current zoning rules don't permit this type of development. I think this is one perfect solution to address "Missing Middle" housing, especially for people who would like an option to own their own home without needing to do a lot of yard maintenance, but don't want to live in a multi-level condominium style building. It can also quell a lot of dissent from people who are upset about giant houses that</p>

	<p>don't "fit the character" of their neighborhoods. I know more than a few people who would jump at the chance to purchase a house in a cottage community, and these can be laid out to take up a more compact footprint than a typical house-with-a-yard.</p> <p>Thanks!</p>
11/02	<p>Hi, I read the article on Cottage Clusters, and I think this would be a great middle income choice for Portland. It embodies a sustainable, attainable model that seems to be a great fit with the both the Portland mindset and affordable housing shortage. I think if this sort of development is codified and incentivized, the cost of developing it will go down. And it sounds like a several other places in the NW are doing it...so...adopt their code or a close version of it! Don't reinvent the wheel. <a href="https://medium.com/@pdx4all/cottage-clusters-portlands-chance-to-build-community-in-a-new-way-7c504c5b260b">https://medium.com/@pdx4all/cottage-clusters-portlands-chance-to-build-community-in-a-new-way-7c504c5b260b</a></p> <p>I also really like the idea of allowing two ADUs per single family lot...especially if one is a basement unit. But two stand alone units would be fine too, as long as the design regulations require them to be subordinate to the main structure, and support neighborhood design standards and historic districts. I think this is an excellent way to increase density in a sensitive, affordable way – much better than tearing down good, older single family homes to put up duplexes or triplexes – that, by the way, will NOT be affordable (many examples out there of new duplex/townhouse developments on SF lots where each of the duplex units sold for more than the original house that was there). ADUs are more affordable because the units are, by nature and by code, smaller. I personally have two properties with ADUs, and the small ADU units (one bedroom units) rent very quickly with rents at \$895 per month.</p> <p>Thanks!</p>
11/03	<p>Hi,</p> <p>I'm on strong support of having the new building codes include "cottage cluster" models. I feel this helps create that middle need of housing. As a young professional, I feel we need more options than super expensive apartments or large family homes where people like me end up needing to rent with a group of friends. I think offering smaller private ADUs and studios would be great for Portland and the cottage clusters are a great solution. They create a great sense of community – it's what Portland is all about.</p> <p>Thanks for your time,</p>
11/03	<p>I was surprised and disappointed to see that the otherwise solid draft of the Residential Infill Project does not go further to define and encourage the development of Cottage Clusters. The goal of the RIP is to promote affordability through a greater diversity of options in our single family zoning. This begs the question: “what aspects of our single family zones are most important to keep, and what should be deprioritized in favor of affordability?” I believe Cottage Clusters represent one the best answers we have to this question.</p> <p>Cottage Clusters prioritize access to private yard space and a physically separate dwelling unit, things that are especially important to Portland families. Families may give up a little by sharing the yard with other families, but they also gain by being able to share resources and</p>

	<p>child care responsibilities. Unlike other forms of middle housing, families would still get to have their own separate house – something that many Portlanders prize but few can still afford. Most importantly, folks living in these clusters will have the same access to the services and businesses in the neighborhood – which are probably better than those in a neighborhood they could afford buying or renting a typical separate home on a full sized lot.</p> <p>The thing that Cottage Clusters deprioritize is the same thing the RIP has deprioritized: home size. As we have seen with the success of ADUs, many people are more than happy to live in a smaller footprint home, particularly if it saves money. These homes cost less to build, are more efficient to heat and cool, and minimize the impact to air and light on neighboring properties. They fit in perfectly in any single family area of Portland.</p> <p>Today, ADU’s are a popular and successful form of middle housing we are already building. We should expand on this success. Cottage Clusters developments would allow ADU-type units to be the focus instead of the periphery. Most importantly, Cottage Clusters would allow such units to be constructed at far lower cost by streamlining development and sharing resources and utilities.</p> <p>Please consider making Cottage Clusters a higher priority in the next draft of the RIP.</p> <p>Best,</p>
11/03	<p>Hi Residential Infill Zoning Team,</p> <p>I am a young 30s professional from Portland who lives in Portland. My partner and I own a home in SE but have been talking with a group of friends (also young Portland professionals) about living in community. We LOVE the cottage idea and even looked at some folks doing this up at the Going Street Commons. But those units are no cheaper than standalone houses due to Zoning restrictions and many of our friends can't afford them.</p> <p>None of us have kids yet but we hope to in the next few years, and sharing life, childcare, and space is something it seems Portland fits with very well. We don't want to live in a commune outside of town, or a big house with shared kitchen and living spaces, we want our own small units, situated together, in community, in the city.</p> <p>So I am letting you know I think Portland should add a full cottage Zoning option. This would increase affordable housing options overall by allowing developers to keep costs down, increasing the number of units on a property. I don't understand this stuff well but feel the cottage option would add great value to our city. And there is a demand! I think lots of young people who we know would be interested as we begin to re-realize the value of people over property. And of course affordable family units are very important and we must tackle that every way we can.</p> <p>I hope you will consider adding this before the November 20 deadline, and delaying if needed to include it.</p> <p>Thank you for all the work you're doing.</p>
11/04	<p>I am enthusiastic about the progressive changes included in the residential infill project. Please consider accommodating cottage clusters within the framework.</p>

	<p>I have heard no fewer than seven of my 30-something peers, most of whom are banging their heads against the housing market, express tremendous enthusiasm for the idea. If such developments were more common, and they could find opportunity to live in one, they would do so in a heartbeat. They've stated preferences for cottage clusters over other types of housing, including multi-unit buildings and lots with just one single family home. The community living aspect is the appeal.</p> <p>Thank you for considering doing the work to make them more common.</p> <p>Best,</p> <p>Homeowner in Montavilla</p>
11/06	<p>I understand the need for these new regulations. However, many of us Eastside home owners are extremely upset that all of the changes are being dumped on us with no impact to the wealthier neighborhoods on the West side. This is not fair and looks pretty fishy re city leaders who live on the west side. I'm sure there are justifications for this inequity but many of us aren't buying it.</p>
11/06	<p>I live in Laurelhurst , I work for BDS, and I'm also very concerned about the homeless crisis. However, I'm also very opposed to the proposed changes to zoning that increase density to provide "affordable" housing/density.</p> <p>The homes that are being proposed and permitted are often skinny, lack any design, and are definitely not affordable (since when is a \$300,00 and up home considered affordable?). In my opinion, the results of the proposed zoning changes will be a city that lacks the beauty and character that drew me and many others to Portland and the changes will not benefit the homeless population. What will probably happen (and already is happening!) is that the "affordable" homes will be purchased by people from out-of-state and rented for exorbitant prices.</p> <p>Please keep Portland beautiful and don't sacrifice it for density. Much like the Urban Growth Boundary, there needs to be a reasonable limit to density, as well as sprawl.</p>
11/09	<p>Please forward to Public Comment Residential Infill Project - Thank you (I started the survey monkey and got 5 pages through when it said "oops we slipped" so I will provide simpler comments here.)</p> <p>Let me start by saying I have a Master's degree in Urban Planning from Portland State and I worked in regional planning in the Portland area for more than 10 years. I was the liaison to the Portland planners doing regional density compliance and am quite familiar with your zoning code. <i>However, I do not understand the full extent of what is being proposed here.</i> If I can't understand it, how are neighborhood organizations and individuals supposed to understand it?? Some very complex math is being done by the amazing neighborhood association land use people but they are not industry professionals....why are they trying to calculate FAR under 3 different scenarios and what does a .015 bonus FAR look like, whats the height, etc. etc. It's crazy.</p> <p>My comments in brief:</p>

- 1) Way too complex. Residents cannot comment because we do not fully know what a triplex with a bonus on a 5000 sq. foot corner lot looks like...is that actually a 4 plex? Is there an ADU? Does that need any off street parking? 2? 3? 4 spaces? How tall is it? How much lot coverage is allowed? Is there any tree preservation? Almost no open/greenspace/drainage?? I got several different answers for what is the maximum triplex square footage....from 2,500 sq. ft. to over 4,000.
  - 2) Too Sweeping. With the “a” overlay applied to about 75% of the city...what does our city look like if we get a triplex on every corner? Or 4 on every corner? How is ‘corner’ defined for our curvy areas or are they exempt? If they are exempt then isn’t that inequitable? On the streets that have the short side – the 200 foot block ends - that could potentially become a Division Street like canyon of triplexes.
  - 3) Misleading graphics. Although the graphics show slope roofed structures the proposal does not address design in that way so you can actually end up with a flat roofed monstrosity such as the absolutely criminally hideous “duplex” currently looming over NE 40<sup>th</sup> and Hancock. You cannot walk around that structure and not see that it is a criminal offense to the neighborhood.
  - 4) Good points of the RIP include addressing design problems: big stairways, monolithic frontages, overall bulk, etc.
- NE 35th Ave., Portland OR 97212

11/09 Hi there,

I'm a local resident who took part in commenting on the Residential Infill Project. I wanted to let you know that you've got some small issues with your questions. These are pretty common survey mistakes, but I wanted to pass this along so that you can both gather better feedback results in the future, and not accidentally offend anyone.

Here's the two questions that contain some errors.

On the first question, you ask what the gender identity of the submitter is. This is great! Much better than "sex". However, the options are a bit offensive (though I doubt that was your intent!). See, a person who identifies as a female, should pick female, right? But what if they are a transgender woman? You've forced them to decide between two options, both of which are technically correct. They may feel alienated by the implication that transgendered people cannot identify as men or women, but belong in a third category. It's not a fun feeling, and certainly not something you expect to see when you take a survey about something like this! A person can be both transgender and identify their gender as a male or female. What I would recommend, is to decide how important the trans\* status is to you in your results. If you decide that is, I would follow SurveyMonkey's recommendation, and break it out into two questions:

What is your gender Identity?

A. Male      B. Female      C. Other \_

(Other, with an option to write in, is a fantastic way to let people who are not trans, but also do not identify as male or female [nonbinary, androgynous, and genderqueer are a few examples], answer this question and feel counted in a meaningful way)

Do you identify as transgender?

A. Yes      B. No

There you go! Problem solved, I can tell you my gender identity, and whether or not I'm trans, without conflating those two separate things.

The next issue!

My problem lies in that you don't have an option for Spanish speaking people who are not from Latin America. Latinx is a *\*very\** geologically tied option. For instance, a person from Spain is not Latinx. What would you expect them to pick on the form? They don't really get a good choice! Here's a great comic by a local artist that explains Latinx and Hispanic, and what they mean: <https://everydayfeminism.com/2015/10/im-latino-hispanic-difference/> Additionally, again, Caucasian and White are *\*not\** interchangeable. Much like above, you can be Latinx and white! Imagine you were born and raised in Brazil, with white parents. You would not be Caucasian, because that term is geographic in nature. You would also be trying to choose just one box when two fit! So what would you want that person answer? The US census decided to fix this problem by making it categories, and letting you select more than one. This article includes some examples of options they may use in 2020, that you might find helpful!

<http://www.pewresearch.org/fact-tank/2015/06/18/census-considers-new-approach-to-asking-about-race-by-not-using-the-term-at-all/>

I hope you find this helpful, and do appreciate the effort to use inclusive language and terms!

Sincerely,

11/11

Please reconsider rezoning between NE Halsey and Sandy Blvd in Rose City Park. The rezoning is ruining Portland. The city seems to think it is for affordable housing but it is wrong since new homes tend to sell for more than older well kept homes in the neighborhood. These stupid moves are driving long term residents out, filling the streets with cars, allowing new homes and buildings to tower over existing homes built right on property lines and sidewalks. I have lived in Portland my entire life and am ashamed at what Portland is doing. I'm ready to pick up and get out of here.

NE 60<sup>th</sup>, Rose City Park

11/11

I am appalled at what this city is doing to well established well kept neighborhoods. Big box houses and no parking seems to be the standard Portland plan. We hear about affordable housing but what gets built is more expensive than the existing homes. Get it together Portland or your fine older homes are going to disappear along with your long time tax paying residents. I am tired of these stupid zoning changes!

	NE 60 <sup>th</sup> , Rose City Park
11/12	<p>In response to your request for comments:</p> <ol style="list-style-type: none"> <li>1) I have just heard about this proposal. If your department is really seeking feedback from the residents you will need to do a much more thorough job. I believe a mailing to every resident would bring about a more complete survey. I would suggest a 6 month extension to accomplish this. There are consulting groups available that can assist with an effort such as this.</li> </ol> <p>As pointed out by Suk Rhee, Involvement Director, who spoke at the last neighborhood meeting: The city government only has a 20% approval rating from its residents (a drop from 27%). A proper survey would help reverse this if residents feel their opinion really has value and especially if those opinions are actually taken into account.</p> <ol style="list-style-type: none"> <li>2) I don't see where the zoning proposal will enhance the neighborhood positively. Perhaps restricting the height of new houses would be the only item.</li> <li>3) I believe the best approach would be to leave things much as they are. Trying to squeeze more population into the neighborhood will not make this a more appealing place to live. The only reason to rezone areas would be to do just that: improve the quality of life.</li> <li>4) It is evident that Portland wants to pack more people into areas close to town. There are a large variety of neighborhoods already close to town with different costs. They are within a few miles of Rose City Park. That is still close.</li> <li>5) Areas several miles to the east may not be as convenient to downtown, so it would be more productive to improve the access to the existing public transport. I would suggest that every MAX station should have public parking, so residents could drive a short distance to conveniently access the MAX. The same should apply to some of the bus routes.</li> <li>6) Will the small "infill" and duplex/triplex structures actually be less expensive. Are they a "good value" for the money? The answer is likely no. The cost per square foot, in many cases will actually be higher than other houses in the neighborhood. So someone who purchases a small place that may appear to be less expensive, may feel cheated when they find they don't have enough room to expand their family or store their belongings.</li> <li>7) And Parking: Can one believe that the new apartment complex in Beumont Village does not provide parking for its residents? This is outrageous. Where are they going to park? Who is going to believe they won't own cars? So requiring off street parking for all residential and business properties would be a zoning change that would help the neighborhood. One nice feature of the Rose City Neighborhood is that the streets are not lined up with cars from end to end as they are in some of the city</li> </ol>

	<p>residential neighborhoods. Who desires to have their home in the middle of a parking lot?</p> <p>8) In summary. The only reason to rezone a residential area such as Rose City Park is to improve the quality of life. This rezoning does not strive to do that</p> <p>NE 59th Ave., Portland</p>
11/12	<p>As an additional thought to my email earlier of today:</p> <p>Many neighborhoods a few miles to the east have much larger lots than those of Rose City Park. Rezoning these areas might make a lot more sense. The lots in Rose City Park are not all that large. I would call them medium to small (5000 sq ft) compared to other places I have lived. They are just large enough for a garage and small back yard. To cut them up to smaller parcels would be sad.</p> <p>NE 59th Ave., Portland</p>
11/13	<p>Thanks to you Morgan! I think the RIP will put Portland on the right path for the future. Looking forward to it!</p>
11/13	<p>Greetings. As a resident of the Sunnyside/Hawthorne neighborhoods my vast concerns about the RIP continue. In fact, as a tombstone for the community character of our neighborhoods, the RIP acronym is astoundingly apt.</p> <p>I see that many changes have been made to the plan. I am happy to see that expensive McMansions are being discouraged and that demolition is being made more difficult (though somehow developers have managed to kill the proposed demolition surcharge increase). However I still see a plan designed for developer profit, city tax revenues, and wealthy (not middle or lower income), future (not current) residents.</p> <p>When population is potentially doubled:</p> <ul style="list-style-type: none"> <li>• How will the infrastructure of schools and other basics keep up?</li> <li>• How will police --- already struggling to maintain even a modicum of safety --- keep up? We have several very long-time residents of the neighborhood who no longer feel safe and are looking to move.</li> <li>• What about open space, trees, plants, yards? When these are reduced due to increased residential density, air quality and quality of life drastically decrease.</li> <li>• Where will everyone park?</li> </ul> <p>What happened to the idea of developing areas further east which are much less dense already and would welcome the improvements? I understand that developers would rather build and sell in the trendy neighborhoods closer to downtown, but why do developers get to dictate the future of our city? I am so disappointed that the city appears to be in their thrall.</p>

	<p>Please help before it is way too late. Thank you so much for listening and for your work on behalf of Portland. It is certainly not easy to balance competing interests.</p> <p>Sincerely,</p> <p>SE 32nd Place, Portland OR 97214</p>
11/13	<p>I am just learning how many developers are on the RIP SAC.</p> <p>In a clear conflict of interest, these folks who stand to profit most from increased density are advising the city council on densification policies. This is a situation which would be illegal in many other states, and should certainly be illegal in Oregon as well.</p> <p>Somehow these vested interests have found a way to disguise their profiteering as a community service, fostering affordability and preparing for an influx of new residents. Displacement of existing residents and destruction of neighborhood character are casualties.</p> <p>This RIP Advisory committee needs to be reconfigured to include more citizen/residents of the inner eastside neighborhoods, or else disbanded.</p> <p>None of us want to stand aside and wait until our neighborhoods are altered forever for the profits of a few. How can we get through to our City Council members on this extremely time-sensitive issue?</p> <p>Thank you for your attention to this.</p> <p>Sincerely, SE 32nd Place, Portland OR 97214</p>
11/13	<p>DEAR BPS,</p> <p>YOU HAVE--INCREDIBLY--ALLOWED THE REAL ESTATE INDUSTRY TO CREATE AN ABSOLUTE TSUNAMI OF GENTRIFICATION IN PORTLAND. YOUR CAPACITY FOR "ECONOMIC PLANNING" HAS BEEN DISASTROUS FOR ORDINARY PORTLANDERS SINCE IT HAS BEEN PERMITTING UPPER INCOME NEW RESIDENTS TO TAKE OVER THIS CITY. EVERYONE ELSE IS GETTING SQUEEZED OUT, &amp; YOUR RIP IS RIDICULOUS. IT CRUSHES NORTH &amp; NE &amp; NOW SE PORTLAND INTO MORE &amp; MORE CROWDED HOUSING SO THE NEWLY ARRIVING WEALTHY HAVE LOTS OF ROOM FOR INSANELY LARGE HOMES.</p> <p>HENCE, THERE'S LESS &amp; LESS DIVERSITY HERE AS YOU ENCOURAGE AS MUCH NEW CONSTRUCTION AS POSSIBLE--&amp; IN THE PROCESS DESTROYING ANY GREEN SPACES.</p> <p>YOUR RIP IS SHAMEFUL &amp; UNBELIEVABLY SHORTSIGHTED. WHAT ARE RENTERS &amp; LONGTIME HOMEOWNERS WHOSE PROPERTY DEVELOPERS DESIRE TO DO?????</p>
11/13	<p>Dear Morgan Tracy and Julia Gisler,</p> <p>As a native Portlander and 31 year homeowner in Sellwood-Moreland, I am very pleased to have the opportunity to comment on the Infill Project.</p> <p>It doesn't take a specially trained designer or urban planning analyst to see that something is not right when you walk past yet another enormously over-scaled new house set among a block of houses with normal proportions. Or block after block of towering banks of apartment buildings that block the light and view all around them. They seem to be</p>

	<p>overtaking our neighborhood. I say ENOUGH. We have enough giant houses and huge apartment buildings. Let's go with options that have a more subtle impact on the neighborhood.</p> <p>Now is the time to reconsider some of the "current code maximums" and other parameters that obviously need lots of fine tuning if we expect to keep any of the livability and charm that attracts people to Portland's neighborhoods. We need to provide housing not just for wealthy people, but for people of all economic levels.</p> <p>Please try to live up to the legacy of livability put in place by Tom McCall and Vera Katz. And move into the future committed to ending racial and economic discrimination in the housing market.</p> <p>The limits outlined in the proposal are a good place to start. Let's do some fine tuning to preserve our communities, before all the charm and character has been razed and paved over.</p> <p>Thank you,</p> <p>Sellwood-Moreland resident</p>
11/13	<p>Dear Sir or Madam,</p> <p>I am writing to express my opposition to a Residential Infill Project whose impact is essentially limited to East Portland. The impact of this should be spread across the city. In the proposed Infill Map, Southwest and Northwest Portland are relatively unaffected. This is fundamentally unfair to the residents of the East side of town. The impact of these plans should not target only the East Side neighborhoods. Yours sincerely,</p> <p>NE 21st Ave., Portland</p>
11/13	<p>To whom it may concern,</p> <p>I am writing to express my support for the Residential Infill Project. I own a home in the Buckman neighborhood and fully support the types of projects the Residential Infill Project would allow in my neighborhood. The Residential Infill Project is necessary for Portland to maintain housing choice and affordability. In addition to supporting the proposal as written, it would be more effective if it:</p> <ul style="list-style-type: none"> <li>• Eliminate minimum parking requirements to preserve trees and remove barriers to duplexes, triplexes, and internal conversion.</li> <li>• Allow the "housing opportunity" provisions in all areas of the city to improve equity outcomes and encourage the creation of additional walking scale neighborhoods.</li> <li>• Make the affordable housing incentives workable to increase the likelihood that they will be utilized.</li> </ul>

	<ul style="list-style-type: none"> <li>• Allow internal conversion of existing houses into multiple units in all areas, and provide additional incentives for housing preservation.</li> <li>• Create a true cottage cluster code that will encourage the development of smaller, more affordable homes.</li> </ul> <p>Thank you,</p> <p>SE Ankeny Street</p>
11/14	<p>Thank you for that information.  However regardless of the integrity of the process it looks like individuals with a financial stake in development ended up filling the majority of the seats on the SAC.</p> <p>I appreciate your work and hope that it is not too late to forestall the downfall of our neighborhoods and our communities for the profits of a few.</p> <p>Sincerely,</p> <p>SE 32nd Place, Portland 97214</p>
11/14	<p>See below my comments on the proposed residential infill zoning amendments.</p> <p>Scale of new houses</p> <ul style="list-style-type: none"> <li>• In the single family zone, an FAR greater than 0.5 is not appropriate. For FAR greater than 0.5, the result will be more like townhomes.</li> <li>• Limiting the FAR will also prevent inappropriate heights.</li> <li>• Fully below-grade basements could be exempted from FAR. Half-basements or walk-out basements need to count toward FAR.</li> <li>• Allowing internal conversions to save historic housing is a good idea. Street-facing facades must be preserved in an internal conversion.</li> <li>• Ensure that creation of ADU's increases supply of owner-occupied or long-term rental property, and does not go toward increasing short-term rentals.</li> </ul> <p>Housing Opportunity Overlay</p> <ul style="list-style-type: none"> <li>• Creating more housing that is affordable and accessible is important.</li> <li>• The blanket approach toward densifying does not respect the immense work that went into the Comprehensive Plan and wipes out all of the nuances in long-range planning that support Portland built character.</li> <li>• As currently defined, the overlay will only precipitate demolition of historic, economically viable housing to line pockets of investors.</li> </ul>

- The overlay does not take into account infrastructure.
- The overlay basically destroys single family house zoning and does not acknowledge the fact that single family home ownership/rental is desirable within the city; not allowing it puts pressure on the Urban Growth Boundary by people who want this housing choice.
- The concept of town centers, walkability and livability is not reflected in this blanket densification; this is not good planning. Planning is not just about housing.

Narrow lots

- Narrow lots do not support the architectural character of Portland except in Old Town.
- Narrow lots will create a street wall of garage doors at pedestrian level, which is incompatible with current zoning code.
- Allowing narrow lot subdivision in R5 zones is UPZONING, which goes against City Council's recommendation and also contradicts the myriad zoning studies which took place during the Comprehensive Plan.

Conflict of interest

By allowing committee members on the RIP with self-serving interests, this zoning amendment project is benefitting those people at the expense of Portland's individual neighborhoods, historic character and livability.

City Council's refusal to recognize this fact is inexcusable. In other cities and states, allowing committee participants who have a vested interest in the outcome of the committee recommendations is considered a crime.

I am deeply disappointed in the direction Portland has taken.

Sincerely,

SE Alder, Portland, OR 97214

11/16

Hello:

I live in the inner SE. I bought a 100+ home in a neglected state here that I am restoring - I am also converting the basement to an ADU. I am concerned that the proposed regulation and zoning changes will allow for more demolition, more development, but not actually create more affordable housing other than possibly via ADUs and existing house conversions. The huge majority of the housing I have seen built in the last 2 years in SE (and I have attended presentations at the neighborhood association), with the exception of the St. Francis Park building (that removed one of the few parks in Buckman) has been middle-

	<p>to higher-income housing. To me, these zoning changes lump together reasonable changes (e.g. conversions/ADUs) with changes that are either purely for increased development without regard to lower-income-housing (the original purpose of this project, as I understand it). Also, the inner SE, especially the Buckman neighborhood, already has a huge proportion of multi-family housing; increasing the ratio of multi-family- to single-family-housing further will result in an almost pure rental neighborhood, which is a major change from the current situation, and one that creates issues of livability when one takes into account the minimum standard under which many landlords operate their rentals (e.g. slow/minimal upkeep, minimal landscaping, etc.).</p> <p>I have also heard that, while the maximum square footage on some lots for new housing has been lowered to 2500 sq-ft., this occurred in neighborhoods where the average home's square footage is only 1500 sq-ft. - i.e. the new limit is over 60% larger than existing housing. This will certainly change the neighborhood, both optically and from a livability standpoint (density). However, mostly the homes that are torn down are relatively inexpensive, and their replacements are very expensive. How does this create more affordable housing?</p> <p>Finally, the more development that occurs in terms of new buildings, the more the neighborhoods will be indistinguishable from those of any other large city in the US. Why would this be a desirable goal for any but those profiting from the building boom?</p> <p>But, most importantly, none of these changes have been demonstrated (to my knowledge) to actually increase affordable housing. In fact, looking to what has already been built, as well as other cities with similar issues, it is my understanding that there is no evidence that more affordable housing is created this way. Currently, much of the most affordable housing is in old buildings that have been split into multiple units over the last 100 years - and often, these buildings are prime targets for demolition and replacement... with more expensive housing.</p> <p>Please feel free to contact me with any questions.</p> <p>Sincerely,</p> <p>SE 15th Ave., PDX, OR 97214</p>
11/16	<p>I do not support the Residential Infill concept in its current form.</p> <p>Though it restricts the size of new homes, it encourages demolitions and threatens to alter the character of single-family RS neighborhoods, permanently designating them R2.5 without going through the zoning process. Smaller scale housing is essential, but there needs to be a mechanism that will restrict the influx of duplexes and triplexes, so they don't overwhelm whole blocks. There is no such mechanism in this set of proposals. Additionally, the zoning, exclusive to inner east side neighborhoods, i.e., "crowning," will negatively impact communities east of 82nd that are well within the urban growth boundary, as transportation and services are unfairly distributed.</p> <p>Also, there is no consideration for implementation of RIP that is in sync with the city's ability to augment safety EMS/Police services.</p>

	<p>There is already a growing shortage of police and insurmountable, levels of crime that require community policing; as a result, a dangerous situation that begs for a solution.</p> <p>Regards,</p> <p>Belmont District</p>
11/16	<p>Hi! I've submitted comments previously, but I wanted to add one more thing. I've stated previously that I think the FAR limits are excessively low under the new rules, but I also wanted to add one suggestion. Since neighbors complaints about new home construction being too big are related to the visible square footage (ie above ground), then why not exclude any square footage that is primarily below ground (ie basements) since that doesn't impact the old home neighborhood character in the same way as above ground square footage. This would somewhat mitigate the loss in opportunity to landowners under the new rules... and even with this caveat I think that given the housing CRISIS that we are facing, then the massive reductions in buildable home size makes no sense. Not all of those large new homes have just one family living in them and we need more residential square footage in this city, not less.</p>
11/17	<p>Is the City of Portland laying out a strategy to destroy East side neighborhoods? In reviewing the PDX Residential Infill proposal, one must conclude there is a perverted strategy to forever alter the single family home neighborhoods with the “overlay” of new zoning. The brunt of the zoning change impacts the East side, not surprising since the City Council members all live on the West side. But why are you so hell-bent on destroying our neighborhoods? What is the root of this desire? The reasons laid out are, “...thousands, millions, want to move here and we must provide them places to live...”. Why? And what is the real reason? All those people who want to move here, are moving here because of our beautiful in-tact neighborhoods, the very ones you want to ruin.</p> <p>I am adding my voice to what I hope are thousands and thousands of other concerned Portlanders, to protest and reject the Residential Infill proposal. It is a poor excuse for handing over our neighborhoods to developers in order to raze our homes (with the added benefit of raising property taxes).</p> <p>Cheers and my support to all the neighborhoods which can secure historical status. It appears to be the only way to preserve Portland.</p> <p>NE Portland</p>
11/17	<p>I offer the following comments about the proposed infill plan:</p> <p>First, I have lived in the same house in Southwest Portland since 2008. I chose to live here because of the neighborhood:</p> <ul style="list-style-type: none"> <li>• modest houses on good-sized lots, so the houses aren't too close together;</li> <li>• room for gardens and trees;</li> <li>• quiet streets that are walkable and not clogged with parked cars;</li> </ul>

- walk to shops and restaurants in Multnomah Village;
- above all, peace and quiet.

I have devoted some hours to educating myself about the infill project, which is not easy for a novice. I have:

- corresponded with Morgan Tracy, the project manager;
- read widely online;
- followed neighborhood conversations.

My conclusions:

- You should heed the recommendations of "the RIPSAC seven" (available at <http://swni.org/sites/default/files/2016-11/Residential%20Infill%20Analysis.pdf>). This is by far the most insightful analysis of the project that I have found.
- The infill project is misguided and will destroy desirable neighborhoods like the one I currently live in.
- The project promises to solve one problem (demolitions / McMansions) by tying this carrot to a need for more housing that can be solved ONLY by increasing density in a way that will make neighborhoods like mine even more undesirable than they would have been had you allowed McMansions on small lots.
- The infill project, instead of targeting dense development in specific areas, spreads development over a huge swath of suburban Portland, creating very dense and undesirable suburbs. I lived in a dense suburb in California, before I moved to Portland, and it had all of the negatives of a noisy, crowded city and none of the benefits of a quiet suburb. If you are going to increase density, you should make certain areas really dense to provide needed housing - the Pearl District is a good example of a dense but desirable and above all URBAN area. The infill project will create dense areas over a huge area that are neither urban nor suburban in character, like Staten Island. Contrast the dense, characterless development of Staten Island (where I once lived) to the denser, urban development of Brooklyn. Brooklyn is a desirable urban area; Staten Island is a mish-mash of older single-family homes surrounded by townhome and multi-unit developments with no discernible character. That's what I fear this project will bring to Portland.

I know city planners are under tremendous pressure, from developers who want to make money and from new residents who need housing. But please don't think you can solve the problem of McMansions and demolitions and scarcity by creating dense development that is neither urban nor suburban. People who want to live in suburbs will flee a few miles further out, putting pressure on the UGB and the outer suburbs, leaving behind a characterless

	<p>Portland core. Instead you should focus on creating dense neighborhood cores surrounded by desirable suburbs. Please return to the drawing board and start again. You really need to get this plan right! - it's not too dramatic to say that the future of Portland depends on it.</p> <p>Thank you. SW 43rd Ave., Portland, OR 97219</p>
<p>11/17</p>	<p>Greetings.</p> <p>Please consider the following comments on the residential infill proposal. For perspective, I have owned a house in Sellwood for 20+ years. I do not work in any housing-related business.</p> <ol style="list-style-type: none"> <li>1. I support the proposals to allow more options on residential lots (generally more ADUs, duplexes and triplexes, as I understand it). However, I think the options should vary by zone. Someone who bought in an R-7 zone, for example, paid for a reasonable expectation that they would not have multi-family housing next door. That expectation should not be defeated; at least not as dramatically as proposed (basically up to three houses next door instead of one). In an R-2.5 zone, more density seems more reasonable and not inconsistent with the reasonable expectations of people living in the area.</li> <li>2. I oppose the added restrictions on square footage and height (directly and through "floor area ratio"). Those proposals would take property rights from people and limit choices for home buyers based on arbitrary and subjective ideas about how big a house should be and unreasonable expectations that neighborhoods won't change with growth. The market will do a better job than government at providing the housing people want in the right quantities. It will also do a better job than government at deciding which houses should be preserved and which should be replaced, making our neighborhoods nicer in the process. Let people decide for themselves how big a house to live in and how to balance size and style with affordability. The market will respond to their needs, including the needs of people with less money.</li> </ol> <p>Thank you for considering my comments.</p> <p>SE 11th Ave., Portland, OR 97202</p>
<p>11/19</p>	<p>I live in Rose City Park neighborhood. I agree that some infill is inevitable, but I think the current plan goes too far in that direction. Building up on Halsey, east of 60th makes some sense. But rezoning every 50x100 lot for multiple living quarters would completely take the livability out of this neighborhood. I would say only 4 lots per block be rezoned for a fourplex, etc. And eliminating off street parking is a very bad idea. Like it or not, most people own cars and need someplace to park. Parking on the street is necessary now, and I can tell you these neighborhood streets can not hold 4 times the parking we now have, which would be the case if all lots doubled or quadrupled in residents – 7/8 who will own a car. A couple may own 2 cars.</p> <p>Please take into consideration the livability Portland neighborhoods and tone down your infill project.</p>

	<p>Thank you,</p>
<p>11/19</p>	<p>Attached are my comments.</p> <p>[From attachment:]</p> <p>Introduction</p> <p>Thank you for the opportunity to submit comments on this project before staff and the Planning and Sustainability Commission make final recommendations to City Council.</p> <p>I am a homeowner in the Rose City Park area of NE Portland and the former Urban Planning Specialist at the Oregon Department of Land Conservation and Development.</p> <p>My residence is a 1,500-square foot, 1½ story, single-family detached house on a platted 5,000 square foot lot in the R5 zone, which I bought in 1990 for \$53,000. It was built in 1915 in the “craftsman” style. A detached one-car garage sits at the back of the lot. The lot is 1½ blocks south of NE Sandy Boulevard, a designated transit corridor with frequent bus service. My lot is within the proposed “a” overlay.</p> <p>I support the City Council’s direction to staff to amend the code and map to:</p> <ul style="list-style-type: none"> <li>• Reduce the scale of houses in single-family neighborhoods;</li> <li>• Create more housing opportunity in the right locations; and</li> <li>• Improve rules for narrow lots.</li> </ul> <p>I also thank and commend City staff for the work they have done on this project.</p> <p>Comments, Questions, and Suggestions</p> <p>Assumptions</p> <ol style="list-style-type: none"> <li>1. Do these amendments provide an adequate financial incentive to achieve the City’s goal? Staff assumes that the proposed development standards will provide a sufficient financial incentive for homebuilders to ignore the current market incentive to build expensive single family homes on the east side of Portland, on empty lots, on partitioned lots, on consolidated lots, or after demolishing older single family homes. I would like this to be true, but it’s not clear to me that it is.</li> </ol> <p>Will providing smaller units and more than one unit per lot indeed make new housing prices more affordable (less expensive) than current housing prices, or will market prices for new housing be high because of the large unmet demand? Here is an example of up-zoning R5 to R2.5 on a transit corridor with frequent service. My neighborhood was mostly zoned R-5 and platted with 5,000 square foot lots. Some time before 1990, the City apparently re-zoned a swath of lots within a certain distance of NE Sandy Boulevard to R2.5. I assume that this was done to</p>

encourage denser housing development along the transit corridor. In 27 years, I have not seen any of these lots redevelop to a higher density.

2. In whose court is the ball now? Regardless of what City Council legislates, there remains a market for large, expensive single family detached houses, which homebuilders are willing to satisfy because of the financial returns. Where will this demand be met? It won't disappear as long as there is somewhere else for it to go; i.e., the other communities within the Metro urban growth boundary (UGB). In other words, Portland would push low density housing development onto someone else, which would make Portland look good and appear to solve its density and housing requirements and needs. But this would not solve the need for greater density throughout the entire Metro UGB to accommodate and contain future urban growth. I think that Metro and the State, who must approve the City's land use code and map amendments, will be concerned about this.
3. Transition period. A related issue not addressed in the amendments is how Portland will meet the urgent need for affordable housing during the presumed transition to a more affordable supply of new housing, which will take many years.
4. Effect on home prices. The staff report states on page 2: "Increasing the supply of housing helps to keep home prices in check." This is an overly broad statement. The future market value of existing homes depends on the type and price of future housing and where it is located. During 16 years as an urban planner in Oregon, real estate personnel consistently told me that adding medium- or high-density housing in a low-density neighborhood would reduce the market value of existing homes. This may ironically make existing homes more affordable to potential buyers, but that is not necessarily a good thing for their current owners.
5. What is a single-dwelling neighborhood? On page 2 of the staff report: "This means more people can live in and enjoy the benefits of single-dwelling neighborhoods." "Single-dwelling neighborhood" is defined in an unusual and overly broad manner. A zoning overlay that could result in the eventual replacement of all of the detached homes with duplexes and triplexes would change a single-dwelling neighborhood to a multi-dwelling neighborhood.
6. What are "the right locations" for new housing opportunities? The discussion draft assumes that the right locations are the lots proposed for the "a" overlay. I don't agree. See my comments regarding the configuration of the overlay.

The City should reduce the area of the proposed "a" overlay in order to preserve some older single-dwelling neighborhoods.

I admit right off that this is in my own interest because my home is within the currently proposed "a" overlay.

I do not support the extent of the overlay. I specifically urge that my house and the homes within at least a mile or so from my house be removed from the "a" overlay.

Rose City Park and most of the other eastside early 20th century neighborhoods are not designated historic districts by the city, state, or federal governments. From what I remember of historic designation criteria, I'm not sure that they would qualify. But this doesn't mean that one or more of these traditional and desirable neighborhoods do not deserve some level of code-based preservation. It would be a serious mistake for the City Council to change all of these neighborhoods in order to encourage new housing opportunities, which may or may not occur. Up-zoning these homes will increase the likelihood that their value will decrease, which will increase the pace of replacement by multi-unit buildings. The area will become fragmented and lose identity as a neighborhood.

Preparing for the future does not mean that the past is irrelevant. We should remember that during the urban renewal craze of the 1950s and 1960s, Portland lost most of its iconic and beautiful cast iron-fronted downtown commercial buildings to the Harbor Freeway and more "modern" commercial development.

Balancing competing goals: Housing vs. the environment

The staff report states on page 4: "This project furthers this principle [environmental health] by increasing open space and natural features while promoting development that responds to positive qualities of the natural setting and site conditions." Increasing front setbacks from 10 to 15 feet and using a new FAR "better accommodates sustainable storm water solutions and provides additional space to grow and preserve trees. Also, emphasizing compact housing in areas close to frequent transit, services and other amenities promotes lower carbon emissions through reduced driving demand."

Very admirable but speculative. Measures have been taken in the past, including light rail lines, downtown transit corridors, downtown and inner eastside trolley, expanded regional bus service, thousands of new apartment units on transit corridors with no or minimal on-site parking, no on-site parking required for single-dwelling houses near transit, more bicycle lanes, hundreds of single-dwelling rowhouses, and bioswales in some rights-of-way.

How much have these measures reduced miles driven, reduced parking demand, encouraged use of public transportation, reduced highway and arterial congestion, decreased the amount of impervious surface, and reduced air and water pollution? How do we know that the proposed measures will succeed any better? How does the City propose dealing with the market dynamic of many people driving more and buying less efficient motor vehicles when the price of gasoline goes down?

How to prevent disproportionately large residential buildings

I don't agree that an FAR standard is the best and only tool to control house size. I think that restricting the footprint size, total square footage of the building, and height should also apply. However, I don't advocate increasing front yard setbacks. See my comments about the proposed setback amendments below.

Increasing front setback from 10 feet to 15 feet in R5 and R2.5

I disagree with this proposal. Most people want a back yard for private outdoor enjoyment more than they want to use a publicly-oriented front yard. The larger the front setback, the smaller the back yard. On small lots, this can make the back yard so small as to be unusable.

How to provide for better drainage and remove pollutants from storm water

The proposed amendments allow outbuildings, additions, and ADUs, including on the lots for recently-built mega-houses. The amendments don't prohibit driveways or the paving of yard setbacks. Please add standards to limit the total area of on-site impervious surfaces.

How height is measured

The staff report proposes measuring building height from "the lowest point near the house." (See page 14.) This is an improvement over the current standard of measuring from the highest point near the house, which is one factor in the disproportionate size of many new homes. However, it doesn't go far enough to solve the problem. Only by measuring height from the sidewalk will the City discourage homebuilders from elevating the first floor of the building and increasing the height of the building.

Aligning the front setback with a neighboring house

I recommend adding a maximum setback to this standard in order to provide "eyes on the street," enhance the appearance of a neighborhood instead of an unrelated group of houses, provide room for a rear flag lot on a deep lot, and provide an adequately-sized back yard. Existing houses with very deep front yards should be non-conforming developments that will eventually be redeveloped or partitioned.

Allowing eaves to encroach into a yard setback

An excellent proposal for the reasons stated in the staff report, as long as it is consistent with building and fire codes.

Requiring a "visitable" (accessible) ground floor unit in certain multi-unit developments

I agree that changing demographics makes this desirable and necessary, and as proposed is not a significant cost to builders.

Rezoning non-confirming narrow lots to R2.5

This is an excellent idea that will promote infill development and add housing units, consistent with the City's housing policies. Some of these lots – but nowhere near ½ of them – are undoubtedly not suitable because of existing physical constraints or conditions and are appropriately exempt from the proposed amendments.

In the current proposal, ½ of the non-conforming, undeveloped narrow lots are exempt from re-zoning. According to the staff report, this was done because of City Council direction in December 2016. I was not present for this discussion and don't know the basis for the Council's direction.

I urge the Planning and Sustainability Commission to recommend that City Council adopt the originally re-zoning map.

Revised on-site parking requirements for narrow houses and lots

These code amendments may, as the staff report states, result in more efficient use of urban land, improve the street facade appearance of narrow houses, provide more room for on-site landscaping, and encourage rear alleys, all good things.

1. On-site vs. on-street parking. As much as some of us want people to buy fewer, smaller, and more fuel-efficient cars and to drive less, this will probably happen slowly. As mentioned above, personal financial decisions frequently supersede environmental concerns. This means that ignoring the cars or wishing them away will not make them go away, or make parking on crowded residential streets easier, at least in the near future. Some compromise is needed to accommodate reality while making provision for a better future.

Before the City permits new houses to be built without on-site parking, and permits multi-unit buildings with fewer than one on-site parking space per unit, please be certain that there is in reality adequate on-street parking available. This means that, instead of city-wide uniform regulations, parking should be evaluated on a site-by-site basis.

2. The tuck-under garage exception. This is proposed for attached houses on narrow lots. I recommend expanding this standard to apply to detached houses on narrow lots, for the same reasons.

Displacement risk analysis

I agree that potential displacement of certain people should be considered in determining residential zoning and development standards.

At the same time, I am concerned about the role that the City may be assigning to the land use code and plan map to address this issue. The housing problems confronting “vulnerable” groups of Portlanders are long-standing and difficult to resolve. Land use regulation is a relatively inexpensive and easy tool, but it is limited. Planners all over the country have been trying to provide affordable housing for decades and are frustrated with the little they have to show for their efforts. Lack of affordable housing is a political issue. Resolution requires political will.

The proposed regulations are inadequate for this task, and they also have negative unintended consequences. First, they shift the burden to middle class neighborhoods, which is not fair. Second, they appear to absolve the City from dealing with the most difficult and expensive social, political, employment, and transportation aspects of the housing imbalance. Third, as discussed earlier, they merely move expensive housing for wealthier people to other cities in the Metro area, which also have an insufficient supply of affordable housing.

A suggested amendment to improve single dwelling (and other) neighborhoods

	<p>Measuring building height is addressed in the proposed amendments, but measuring fence height is not. Similar to my comments about how to measure the height of the building, I recommend that perimeter fence height be measured from the sidewalk. It is common in my area to increase the grade of a yard setback by up to five feet or so, and then construct on top a fence that is an additional five to eight feet high. There is often no setback between the sidewalk and the fence, and no vegetation in front of the fence to relieve the starkness and fortification-like appearance of withdrawal from the neighborhood. (Enforcement of existing fence height limits would also be very helpful.)</p> <p>I also recommend limiting retaining walls in front and side yard setbacks or abutting a sidewalk to no more than four feet above sidewalk grade, and providing for an adjustment process for lots with houses that were built with the first floor more than four feet above the sidewalk.</p> <p>Comments from the Rose City Park Neighborhood Association (RCPNA)</p> <p>The RCPNA drafted tentative recommendations and made them available to the public for input. I have not seen the final RCPNA comments to the City.</p> <p>In the tentative RCPNA comments was a map with a revised “a” overlay along NE Sandy Boulevard: a 600-foot wide strip, with 300 feet on either side. Sandy Boulevard is depicted on the map as a line, and its right-of-way width is not stated or depicted. I can’t tell whether the two 300-foot wide overlay strips start at the centerline of the right-of-way, or at the south and north boundaries of the right-of-way. The southern boundary of the RCPNA tentative “a” overlay appears to run through the middle of my block on NE 63rd Avenue, but the ambiguity about the exact location of the overlay means that I can’t tell whether or not the overlay would affect my lot.</p> <p>I am also concerned that the recommended revised “a” overlay parallels Sandy Boulevard and so cuts diagonally through lots. As stated in the staff report, this is not good planning policy.</p> <p>Conclusion</p> <p>Thank you for considering my input.</p> <p>Respectfully submitted on November 20, 2017,</p> <p>NE 63rd Avenue, Portland, OR 97213-4608</p>
11/19	<p>The lack of written notice concerning the proposed overlay zoning change is preposterous and should be illegal.</p> <p>The proposed "A Overlay" as described on the website does not "complement the scale of single dwelling neighborhoods" as noted in the overlay goal, at least not in the South Burlingame neighborhood. This proposal may be appropriate for some neighborhoods but does not fit in South Burlingame's hilly terrain, uniform scale and collection of 1-2 story</p>

	<p>residences which give the neighborhood such a desirable character. These are indeed the features that drew us to this neighborhood in the first place.</p> <p>The proposal to allow the tri-plex units on corners and replacement of single homes with duplex units will drastically change and destroy the character that South Burlingame is known for. The scale of the two and three unit blocks are out of place in this neighborhood. If the "A Overlay" is approved as currently written, the result is likely to create a rather homogenous look across neighborhoods - a look that is certainly not what Portland is known and loved for.</p> <p>The proposal to add the "A Overlay" to the current R5 zoning of South Burlingame is inappropriate. "A Overlay" should not be considered a "one size fits all" solution to the needed housing infill planning effort. Please consider solutions for South Burlingame that indeed "complement the scale of single dwelling neighborhoods".</p> <p>South Burlingame resident</p>
11/19	<p>Dear city planners,</p> <p>I am a board member of the Rose City Park Neighborhood Association, and while I am not writing to you in my capacity of board member, I feel it is worthwhile to note. Our neighborhood association is very active and I strongly disagree with nearly all the proposals that my fellow board members are composing regarding RIP. So, for the record, it is not a unified voice coming from Rose City Park.</p> <p>I own a house near the 60th St MAX stop and my property is in the overlay for R2. I support up-zoning of my neighborhood. I recognize it is important for the good of our city and community's future that more people have access to affordable housing "close-ish-in" and would like for other people to enjoy the ease of access to convenient public transportation that I currently enjoy.</p> <p>As for the new overlay of allowing more density more broadly across the city, such as ADUs and multiple units in single-family zoned areas, I think this is smart and visionary. I believe city government's role is to be transformational. Change is challenging, and residents are wary, which I understand, but for the health of our community, these are needed proposals that you cannot let slip by due to gridlock.</p> <p>That said, while I support the new overlay to allow multiple units in single-family-zoned areas, I believe regulations should be stringent. Incentivize affordable units and green spaces (planted with native species - the East Multnomah Soil and Water Conservation District has some knowledgeable staff!). Dapple in commercial small businesses within residential areas so that folks can walk or bike to do their errands. Allow narrow lots to be built on.</p> <p>Please be smart and strategic! The city of Portland missed a major housing opportunity by letting a huge, windowless, empty self-storage box be built next to the 60th St MAX stop. That could have been a golden opportunity to build an affordable housing complex with some commercial space and would have transformed the MAX stop into a busier, pedestrian hub. Instead, most of us who live in the hood are pretty seriously disappointed and it has</p>

	<p>given cause to mistrust the priorities of the city and decreased goodwill towards city-led density projects such as RIP.</p> <p>Thank you for the good work that you do. NE Multnomah St</p>
11/20	<p>Bullet points:</p> <ul style="list-style-type: none"> <li>• I am OPPOSED to the rezoning of my neighborhood to R2.5.</li> <li>• This will adversely affect my property values.</li> <li>• I own 3 properties in this neighborhood. One primary residence, one business, one rental.</li> <li>• I just invested over \$100,000 in my primary residence because of the neighborhood and quality of life.</li> <li>• This will change the quality of my neighborhood and increase traffic which is already a problem.</li> <li>• There are plenty of open lots in the Cully neighborhood to build on. I don't understand why this neighborhood is being targeted.</li> </ul>
11/20	<p>Portland Planners:</p> <p>Because the Woodstock Neighborhood Association Land Use Committee (WNA LUC) is currently transitioning to new leadership, we have not spent as much time as I would have liked reviewing the Discussion Draft of the Residential Infill Project. However, one paragraph in Volume 1, on page 41 under "Constraints," jumped out at several of us as highly relevant to our neighborhood. We would like to express strong support for the concept that "...streets that have not been accepted by the City for maintenance (i.e. unimproved streets) are not eligible to use the additional housing type allowances in the (Additional Housing Opportunity) Overlay Zone." This is highly appropriate. Throughout the 2035 Portland Comprehensive Plan process, the WNA LUC has continued to point out that, due to the significant number of unimproved streets in the Woodstock Neighborhood, many areas currently proposed for up zoning in the Comprehensive Plan are not currently served by adequate infrastructure.</p> <p>While we are a neighborhood increasingly rich in amenities, there is a serious lack of a transportation grid able to provide reasonable access to those amenities.</p> <p>Sincerely,</p> <p>Woodstock Neighborhood</p>
11/21	<p>Dear City staff,</p> <p>I am strongly opposed to the re-zoning plan for South Burlingame neighborhood. The addition of duplexes, triplexes and consequential increase in density is not supported by the</p>

	<p>infrastructure. There are unpaved roads, few sidewalks and narrow streets throughout the neighborhood.</p> <p>The lack of height and setback regulation will allow for large, oversized homes changing the nature of the neighborhood, reducing light and livability.</p> <p>On the map, South Burlingame appears to be adjacent to major roads. However, due to the topography, the access to the neighborhood is limited. Most of the lots are actually 15+ blocks of travel away from Barbur Blvd or freeway access. So again, it is not practical to place many people with high density in this location.</p> <p>Please change the South Burlingame designation so that triplexes are not allowed, duplexes require approval and are allowed only on corner lots, and new homes must follow setback and height standards which are typically of the current homes.</p> <p>Thank you</p>
11/21	<p>I attended the NE drop in clinic and am also following this project to the best of my ability. I firmly endorse the project but do not understand why the boundary would be smack down the middle of Prescott. There are so many large parcels that could be developed all through Cully; especially north of Prescott all the way to Columbia Blvd. I have lived in this neighborhood for 22 years and know of many half acre and full acre sites throughout the area north of Prescott, just waiting to be utilized for housing, rental or otherwise. At the very least, expand it to Going st or Alberta. Take advantage of an area of buildable lots that does not exist south of Prescott and to the west toward Alberta Arts. If your concern is displacement of tenants, I'm here to tell you there would be a lot more tenant housing available if you included all of Cully.</p> <p>My second point is the fact there are two elementary schools on Prescott, Harvey Scott and Rigler. What an opportunity that would be lost if you do not allow the boundary to be pushed further north. We need more affordable housing and rental units surrounding these two elementary schools, not fewer!! Leaving off prime, buildable lots would be, in my opinion, a mistake. One last point, Prescott is a main bus line. With the schools, and a main bus line, let's utilize all of those big lots north of Prescott to build affordable housing.</p> <p>Thanks!</p>
11/21	<p>Dear Mayor, City Commissioners, and BPS staff,</p> <p>As the comment period for the city's discussion draft of the Residential Infill Project comes to a close this month, I wanted to share with you an op-ed that I wrote for The Oregonian in my capacity as a member of the City Club of Portland's affordable housing research committee.</p> <p>I am sharing this now as a reminder that the City Club membership seriously considered, and ended up approving, a recommendation to rezone all residential neighborhoods across the city for more "missing middle" housing types (including duplexes and triplexes).</p>

	<p>The current RIP draft falls short of this recommendation and I urge you to consider revising it to allow for more versatile and affordable housing types in all residential neighborhoods across the city.</p> <p>In addition, I encourage you to consider all of the improvements suggested in the letter sent by the Portland for Everyone coalition.</p> <p>Please take a moment to read this piece in its entirety and then consider whether the RIP as drafted really does enough to address the two most urgent crises facing our community: housing affordability and climate disruption. This is the time for leadership and action and it would be a shame to fall short when the answers are right in front of us.</p> <p>Kind regards,</p> <p>NE 28th Ave., Portland, OR 97211</p> <p>[Link to article attached:]</p> <p><a href="http://www.oregonlive.com/opinion/index.ssf/2016/04/portland_needs_more_multifamil.html">http://www.oregonlive.com/opinion/index.ssf/2016/04/portland_needs_more_multifamil.html</a></p>
11/21	<p>I believe trees will need to be cut down to build more houses (2.5 designation) and more ADU's. I am very concerned about losing old trees, which cannot actually be replaced for 60-100 years.</p> <p>University Park</p>
11/23	<p>Overall, I am excited about the work that the City has undertaken to create opportunities for much needed 'middle housing'. I've lived in Portland for over 12 years and have watched my neighborhood of the past 10 years change dramatically. What is clear is that people are continuing to move to Portland and we have to collectively figure out how to accommodate these new arrivals without sacrificing the historic neighborhood character that makes so many parts of the City so great.</p> <p>With the shortage of available housing stock, there is clearly a need for more housing. In many instances, however, developers have laid to waste single family homes in good condition only to put in their place a new McMansion. There are certainly instances in which homes are derelict and should be taken down (full disclosure: I am responsible for one such deconstruction myself), but if that is done, it should lead to greater housing density. The Residential Infill Project does a really good job of addressing this.</p> <p>Having the opportunity to speak with staff directly about this project was helpful when I stopped by the 'Drop-in office hours' on October 29th in NE. I was able to clarify some of my questions and concerns, which assisted me in formulating my feedback for specific areas of the project.</p> <p>To provide some background, I own a roughly 10,000 sq ft lot on the east side that falls within the new 'a' overlay zone. As a small-scale developer, I have had the luxury of waiting to develop the property. One of the primary reasons for waiting to develop has been some of the anticipated opportunities to add density through the new provisions of the RIP.</p>

	<p>Based on the discussion draft of RIP, I'd like to divide the lot into four separate properties and build a pair of attached town homes. Key to this plan is taking advantage of the housing opportunity to build one attached and one detached ADU (with alley access) for each town home.</p> <p>However, the non-scaled FAR allowance for detached accessory structures of 0.15 really limits the opportunities to build a detached ADU in a R2.5 zone. If the lot is 2500 sq ft, the detached ADU could only be 375 sq ft, which precludes me from building a garage located on the alley with ADU above. This provision would force me to make a choice of whether to build additional living space OR garage/storage space. Allowing for additional FAR for a detached accessory structure would allow for real off street parking/storage as well as additional living space.</p> <p>In a R5 zone, a 5000 sq ft lot can be developed with a 2500 sq ft primary residence plus a 750 sq ft detached accessory structure. In a R2.5 zone, a 2500 sq ft lot can be developed with a 1750 sq ft primary residence, but only a 375 sq ft detached ADU.</p> <p>My suggestion is to scale the detached accessory structures allowances similar to how the FAR is scaled for primary residences in each of 3 zoning categories. For example, you could allow detached accessory structures 0.3 FAR for R2.5, 0.2 FAR for R5 and keep R7 at 0.15 FAR. In order to keep the scale of these detached units in line with the rest of the plan, you could limit the total square footage allowed to 1000 square feet. If the footprint is a concern, there could even be a provision requiring detached accessory structures over X sq ft to be two stories. I realize that this makes things a little more complicated; nevertheless, growing and scaling the FAR of the detached accessory structures would provide for more comprehensive density.</p> <p>Two additional points that I think are helpful and which I support are improving the setbacks to better reflect adjacent houses and reducing minimum lot width from 36 to 25 feet for land divisions. The first point is just a solid aesthetic choice that will make new development blend more gracefully into the existing neighborhood. The second point regarding minimum lot width will make my project to add more density possible by creating lots that are approximately 25' by 120'.</p>
11/24	<p>I have attached my comments on the October 2017 Residential Infill Project Update. Thank you.</p> <p>[From attachment:]</p> <p>Dear Mayor and Commissioners,</p> <p>This supplements my July 14, and 18, 2016 letters opposing Proposals 4-7 in the Residential Infill Project Update of June 2016 and responds to the October 2017 Residential Infill Project Update.</p> <p>In the Residential Infill Project Update of June 2016, p.4, the Stakeholder Advisory Committee acknowledged the problem current residents have asked the City to address.</p>

“The average size of houses built in 2013 was nearly 2,700 square feet, more than 1,000 square feet larger than houses built forty years ago.”

“While older houses are generally smaller than those being built today, it is rare for new houses to be as large as what is allowed by current code. If the trend towards larger houses continues, under current rules, future infill could be much larger than the size of typical houses today. Resulting impacts are often cause for public concern, including loss of space for yard, gardens or trees; more shading on adjacent lots; greater energy and material consumption and less neighborhood compatibility.”

In the October 2017 Residential Infill Project Discussion Draft (RIP Draft), Vol. 1, p.1, City planners stated that “the overall population is aging and the number of people per household is getting smaller (from 2.3 to 2.1 persons in 2035). But despite shrinking households, there are few options for smaller households to live in single-dwelling neighborhoods, where increasing land costs and market trends have produced mostly larger houses. . . . Portlanders are also worried about increased demolitions and replacements that are larger, more expensive and sited differently than surrounding older homes.”

City planners propose to discourage construction of larger houses by setting the floor area ratio (FAR) limit at .5 for the main structure in a single-family zone, allowing one internal ADU. But under the RIP Draft City planners also propose to allow an additional .15 FAR, 750 sq. ft., for a detached ADU, and do not count the basement in the FAR. Due to these allowances the “2,500 square foot” house described in the RIP Draft could actually be 3250 square feet plus the basement. New single-family houses would be allowed to have two ADUs—in other words, a triplex development.

This policy would continue the incentive to demolish most of the homes in single-family zones since the average size of those houses, 1700 sq ft, is about half of the 3250 sq. ft. allowed. The City needs to adjust the calculation of FAR allowed in the code to include all habitable space. Bonus units should only be allowed if the existing house is retained, including its entire exterior. If an effective limit is placed on house size, the profit motive to build large houses is reduced, and there will be fewer demolitions and smaller more affordable houses will remain.

When an internal and detached ADU are added to smaller existing homes that average only 1700 sq. ft., using on average 2450 sq.ft. of a 5000 sq. ft. lot (1700+750), about half or more of the lot remains vegetated and with trees upon it. Builders that demolish older homes typically clear all vegetation and trees from the lot. And large homes do not leave enough room to maintain or grow large trees; 12 by 12 feet is the required green space. It is not necessary or appropriate to consume 3250 sq. ft. or more of a lot to produce two ADUs on the lot.

The continued demolition of buildings across Oregon amounts to a staggering amount of embodied energy that is literally being thrown away. Every time we raze an older house and replace it with a new, more energy efficient one, it takes an average of 50 years to recover the climate change impacts related to its demolition. See January 28, 2014 article entitled “The Impact of Oregon’s Increasing Demolition Trend” by Brandon Spencer-Hartle on the [restoreoregon.org](http://restoreoregon.org) website. And large houses are more expensive to heat and cool and have

a more negative ecological impact than smaller houses, including the resulting impacts described in the RIP Update of June 2016 above.

In addition, “According to a recent national study, if the city of Portland were to retrofit and reuse the single-family homes and commercial office buildings that it is otherwise likely to demolish over the next 10 years, the potential impact reduction would total approximately 231,000 metric tons of CO<sub>2</sub> – approximately 15% of [Multnomah County’s] total CO<sub>2</sub> reduction targets over the next decade.” See January 28, 2014 article entitled “The Impact of Oregon’s Increasing Demolition Trend” by Brandon Spencer-Hartle on the [restoreoregon.org](http://restoreoregon.org) website.

In an Oct 7, 2015, article entitled “The State of Demolition in Portland” by Brandon Spencer-Hartle on the [restoreoregon.org](http://restoreoregon.org) website, Mr. Hartle updated his January 28, 2014 letter.

“Using data compiled from the demolition applications, PortlandMaps, and the Bureau of Planning and Sustainability, the 172 demolitions that occurred from April 27 to October 5 had the following average characteristics: Built in 1930, 1,340 square feet in size. Generated 58,558 pounds of landfill waste upon demolition (not including recycled materials). Assuming that 400 houses are indeed demolished in Portland this year, it will mean that 23 million pounds of waste will end up in Oregon’s landfills. That’s the equivalent of sending 2.5 billion pieces of paper to the landfill!” In fact over 300 single-family homes in Portland are demolished annually. BPS website, [portlandoregon.gov/BPS/70643](http://portlandoregon.gov/BPS/70643).

The City’s first priority should be to reduce the avoidable climate change impacts of development and preserve our existing neighborhoods, homes and vegetation. Backyard habitat certification of existing homes should be supported and encouraged. Before considering the RIP Draft, the City should update its historic resource inventory, begin public review of demolitions, require deconstruction when a home cannot be saved (not just for pre-1917 homes), tax landfill waste, remove hurdles to relocation and provide financial incentives for preserving existing homes. See January 28, 2014 article entitled “The Impact of Oregon’s Increasing Demolition Trend” by Brandon Spencer-Hartle on the [restoreoregon.org](http://restoreoregon.org) website.

The most energy efficient and cost-effective way to accommodate new residents while preserving the character of existing neighborhoods, including existing yards, gardens and trees, preventing shading on adjacent lots, avoiding greater energy and material consumption and stopping the building of larger incompatible structures, is to provide bonus units only if the existing house is retained, including its entire exterior.

Finally, City planners acknowledge displacement of renters as a potential outcome of the upzoning and “opportunity” overlay but only exempt some areas in three neighborhoods and East Portland. RIP Draft, Vol. I, pp. 44-48. Many more rental homes will be demolished under the RIP Draft because builders profit from tearing down an affordable rental home and building bigger houses or multiple market-rate units. Under the RIP Draft, demolitions will shift disproportionately to neighborhoods of smaller, less expensive homes, resulting in even greater displacement pressure on their residents, especially renters.

	<p>If the City is serious about providing low income families housing in the inner ring neighborhoods, it will do so by retaining less expensive, smaller existing homes that they may rent and assure that internal conversions (ADUs) and detached ADUs are available only for long-term rentals and sales. The City should also support Proud Ground and equivalent housing subsidy programs that, for example, allow families to own the structure but not the land. ADUs could also be “condoized.” Permit fees could be waived for ADUs that are offered as affordable housing.</p>
<p>11/24</p>	<p>Thank you for the opportunity to comment. In short, I appreciate the RIP and support the comments from Portland for Everyone. My comments are generally in support of greater density to allow the city to be resilient, affordable, fiscally sustainable, and environmentally strong.</p> <p>First and foremost, I believe this project should seek to undo past discriminatory practices unleashed through the City’s zoning code that were meant to keep people out.</p> <p>In terms of the ¼ mi from frequent transit line, I would argue this could be expanded slightly as follows: “1/4 mi within a transit line that provides frequent service during AM/PM peak.” This would include lines like 45 &amp; 70 that run frequent service during peaks. Moreover, in the coming years, TriMet will begin operating a bus rapid transit (“BRT”) line with designs meant to increase reliability and predictability through greater stop spacing and signal prioritization. This line will be on SE Division. I would argue that instead of treating this line as frequent service (which it is), it should be treated as MAX service and greater density should be allowed within ¼ mi (or more) from BRT stations.</p> <p>We should also be looking to have minimum building heights. In areas near both parks and high capacity transit (ex. Overlook Park), buildings should have minimum heights to capitalize on the assets of that neighborhood.</p> <p>East Portland lacks frequent transit service lines. It should be included in increased density so that the housing stock can continue to grow and remain affordable as supply increases. There needs to be some sort of carve out for east Portland otherwise the cycle of low-density, infrequent transit, increasing housing prices, and diminished biking/walking infrastructure will continue.</p> <p>Children born today will likely live to see the year 2100. In the face of climate, affordability, and political crises, Portland will likely continue being a hub for domestic and international refugees. We owe it to the next generation and refugees from within and outside of Portland to be able to move here, strengthen the economy, and continue to build stable lives and thrive in this great city.</p> <p>Thank you,</p>
<p>11/24</p>	<p>Hello,</p> <p>I am a contractor who currently is building in the city of Portland on a new narrow lot zoned R2.5.</p> <p>Several items:</p> <ul style="list-style-type: none"> <li>• How are sdc’s going to be calculated/charged?</li> </ul>

	<ul style="list-style-type: none"> <li>• Builders build for profit, what incentive do I have to build multiple small units vs one larger one? All things being equal, sales/price is driven by square footage of the building. So if I can build a sfr of size x or a duplex or triplex still a total of size x, the sales price is not substantially higher. I cannot afford to build it at a profit if having to pay the sdc's.</li> </ul> <p>I find it hard to believe that builders will build multiple small units in lieu of a larger one without some assistance in the way of reduced sdc fees for the small units.</p> <p>On a side note. Not allowing parking in the front setback is just plain stupid. I am currently building at a lot with a 10 foot front setback and had to provide a 18 foot deep parking spot beyond the setback for a total of 28 feet. Does the city think that the new owner will not park two small cars in this spot? Hello planners????!!!!</p>
11/25	<p>To Members of the Planning and Sustainability Commission, City of Portland Planning and Sustainability staff and the public:</p> <p>Thank you for the opportunity to comment on the proposals for new regulations from the Residential In-fill Project.</p> <p>In general, I believe this is a good step forward in addressing neighborhood disruptions caused by inappropriate development. It is time to stop "sore thumb" construction: where new homes are built in the middle of a row of older homes and do not fit in. In some cases builders work to find marketable designs that blend in with the older homes, but more often these new homes stick out closer to the street or rise to a height unlike the majority of homes nearby.</p> <p>The new rules, I believe, address this problem in a responsible way.</p> <p>The rationale makes sense, too. I would go farther, however. I did not see much discussion of the need for ground and vegetation to keep neighborhoods cool and provide for urban wildlife networks. On the one hand the city promotes the need to disconnect storm drains and take care of water drainage from roofs on the property, yet regulations up to now severely limit where water can go. These concerns need to be highlighted as well: it is not just about smaller families needing less space.</p> <p>These new regulations help move us to a more sane approach to development: allowing growth yet still maintaining systems and standards which enhance life in the city. Please accept no setback reductions or FAR changes beyond what are already proposed here! The plan already has found the correct balancing point.</p> <p>I can understand how some might argue this restricts development, growth and, yes, profits for developers. I don't think anyone will be severely harmed by these changes. What these new regulations will do is actually increase interest in both existing homes and new homes in Portland. The quality of life is maintained, even increased while still allowing greater population density. Current regulations, I argue, have turned once liveable communities into shambles, where packing more people or more structures into a space was the only rule.</p>

	<p>I do object to the short shrift given to historic housing stock. There is a brief comment about a state limit on what the city can do to preserve historic homes. This needs to be explained before I can consider the lack of a proposal adequate.</p> <p>One of the things that makes many neighborhoods of Portland great is they do have homes which are almost 100 years old or even older than 100 years old. These homes have had changes made to them over the years and a succession of owners not considered historically important. As a result getting any historic designation for them is not probable. Yet these homes are solid, well-built structures which, given city support, can live on and enhance neighborhoods.</p> <p>Restoring and fixing these homes is often beyond the means of their owners. As a result the lots they sit on end up having more value for developers to place homes with greater square footage and more amenities.</p> <p>I certainly understand that deteriorating homes along major arterials may no longer fit and their lots' highest and best use might for multi-story apartments and mixed-use. Outside these corridors of commerce, transportation and density, however, older neighborhoods provide that extra something that makes a city diverse and interesting.</p> <p>The city should not dismiss finding a way to support homeowners who want to keep and refurbish these homes and preserve enclaves of history. Alongside these modern apartment buildings and well-maintained roads and parks, these older homes provide a city resource of their own.</p> <p>The city should do more to protect older homes in neighborhoods. It should be an advocate for them when the people living there do not have the financial means to protect their neighborhood character. We have seen time and time again the high profile cases of neighbors banding together to protect some historic home from demolition. Yet these are people who have the resources to do this and these cases are much fewer than the many where homes from the 1890s, 1900s and 1910s have been destroyed without as much as a whimper. Where is the city effort to help single family home owners preserve and enhance their properties and thus maintain their neighborhoods? It does not exist and it should.</p> <p>Sincerely,</p> <p>North Heppner Ave., Portland, OR 97203</p>
11/25	<p>Hello:</p> <p>As a person with a master's degree and a former federal government employee who's followed this plan from the beginning, really tried to understand it, and submitted comments both at a public meeting and in writing-- meaning, if anyone should be able to make sense of it, it should be me--- I am truly baffled as to the changes proposed for my single family skinny home in North Portland (8847 N Burrage Ave). I see new proposed regulations for historically narrow lots that encourage duplexes, but my neighborhood is now outside the A overlay that would allow them. I fail to understand what mitigating factors excluded my neighborhood, and what is intended to be accomplished with the changes here. What will happen when my block of skinny houses built in 2006 starts to</p>

	<p>deteriorate, will replacement houses not be permitted, nor duplexes on adjacent lots, meaning that the only option will be to tear down two houses and replace them with one, thereby reducing density instead of increasing it, as the construction of these houses (which also used to be affordable) accomplished in the first place?</p> <p>I do very much appreciate the significant changes to new infill houses being proposed in Kenton; that will help mitigate our ridiculously large infill at ridiculously expensive prices that are fast pushing affordable housing for both buyers and renters out of all of NoPo. But truly don't understand the intention of the combined changes on our skinny house areas here, the largest concentration in the city, yet many left out of the a overlay. Please help me out with a coherent explanation.</p> <p>Thank you,</p> <p>Portland, OR</p>
11/25	<p>Subject: RIPSAC Testimony on the "a" overlay, not rezoning underlying narrow lots, allowing front loading garages and requiring off-street parking.</p> <p>To start with, directives made by the Portland City Council at the December 7, 2016 council meeting were not followed. Commissioner Nick Fish asked for optional mapping with smaller 'a' overlay options. Encompassing nearly the entire working class residential areas on the eastside between the Willamette River and 82nd Avenue, the 'a' overlay zoning is excessively too massive.</p> <p>Instead of applying overlapping 'a' overlay zoning within a quarter mile from transit corridors and town centers, this experiment needs to be tried out with much smaller pilot test project areas such as within 300 feet or one city block of a town center, Max station or an "existing" (as recognized by TriMet's website) frequent transit service line. In the Rose City Park Neighborhood, this would include only the residential zoned areas within 300 feet of Sandy Boulevard and within 300 feet of the Hollywood Town Center on the eastside of 47th Avenue. The 60th Avenue Max Station area was up zoned by the comprehensive plan.</p> <p>Equity also requires that 'a' overlay pilot test project areas should be included in the upscale and well-heeled affluent areas of the west hills. Claiming topography of the area as an excuse not to do so is just a tactic to shield the wealthy from any infill development.</p> <p>Again at the December 7, 2016 city council meeting, of the amendments proposed by Commissioner Amanda Fritz and passed by the council, one was to retain the R5 zoning where there are existing R2.5 underlying lot lines. In the current proposal this has been ignored by staff.</p> <p>Rezoning underlying 2500 square foot lot lines to R2.5 in existing R5 zones generates an inducement for developers to demolish viable single family homes, likely replacing them with more expensive housing. It is primarily the starter homes, the small bungalows that have green yards with big and mature trees, and lowest cost homes that will be the first to be demolished. There has been no resolute analysis to ratify adding housing in this manner will reduce the cost of housing.</p>

What makes Portland Portland and why people want to move to Portland is in part the preservation of built up and historic single family home neighborhoods. Instead of offering a panacea for developers to RIPSAC apart and demolish viable single family homes in already built up single family home neighborhoods, the present zoning needs to be retained. When the Rose City Park Neighborhood was originally platted in the early 1900s, it was envisioned as a village in a park. It still retains most of that context and charisma today. Surrounded by R5 zoning, the current proposal on the table includes up zoning numerous properties to R2.5 in the heart of the neighborhood between NE 57th and 60th Avenues near Rose City Park School. Per a poll conducted by the Rose City Park Neighborhood Association, an overwhelming majority of residents and affected property owners are opposed to both the R2.5 up zoning near the school and the 'a' overlay for the rest of the neighborhood.

I personally agree with the results of the poll. For most working class homeowners, a good portion if not all of their life savings and wealth is tied up in their homes. When people purchase a home and move into a neighborhood, they expect the neighborhood to retain much of it's ambiance and fabric. The city has a due diligent responsibility to homeowners to protect their investment along with the livability of each and every neighborhood. The current RIPSAC proposal takes just the opposite approach.

Another amendment proposed by Commissioner Amanda Fritz and passed by the council was the elimination of disallowing front loading garages on narrow lots. It too has been ignored by staff. Is this type of dismissal by staff setting a precedence that sends the message whereby the people of Portland too should just be able to snub anything the council passes?

Many of the residential streets in Portland's single family home neighborhoods are narrow by modern standards. When these streets are full of parked cars, it can have a negative impact as it applies to safety and access for emergency vehicles, garbage and delivery trucks. There is also an un-enforced rule that cars can not be parked on these streets for more than 24 hours.

Even with autonomous vehicles on the horizon, it is farce and fantasy to think car ownership is going away any time in the foreseeable future. The city's dictatorial social engineering attempts and apparent car hater mindset totally lacks a reality check. Autonomous vehicles could very well make fixed urban transit systems dinosaurs and possibly obsolete. Even though people may utilize alternative modes of transport to commute, people are likely to still own cars for the freedom of weekend and longer distance travel, and will still need a place to store them when not in use. This storage needs to be off the streets.

"Adequate" off-street parking for all residential units and single family homes needs to be required and provided. Parking pads and front loading garages on narrow lots need to be allowed as part of the necessary fabric in single family neighborhoods. If electric cars are to become common place, residences need to have driveways, parking pads and garages that have close by access to electricity. My recommendation is with the allowance of at grade front loading garages on skinny houses, there be a requirement that the garage doors be weather tight and have windows so the garage can be utilized as an extra multi-purpose room for people that may not have a car. Tuck-under garages on flat lots do not make sense

	<p>because they all too often require more stairs to climb to a front porch and entry door, and are by and large out of place when compared with the structural design of neighboring houses.</p> <p>Respectively submitted,</p> <p>Northeast Portland</p>
11/25	<p>To Whom It May Concern,</p> <p>I am writing in support of the residential infill project proposal, my primary concern is that the proposal is not aggressive enough in allowing more housing options in the entire city.</p> <p>I am in large agreement with Portland for Everyone's comments and recommendations, in particular I strongly suggest:</p> <ul style="list-style-type: none"> <li>• Expanding the opportunity zone to the entire city.</li> <li>• Allowing internal conversions in the entire city.</li> <li>• Allowing more housing types to be built, such as cottage clusters and courtyard apartments.</li> </ul> <p>In addition I very strongly advise that current minimum parking requirements in single family zones be eliminated in the opportunity overlay.</p> <p>Minimum parking requirements will make it difficult to take advantage of the proposal's intent to encourage duplexes, triplexes, and internal conversions. Many lots will be unable to accommodate the reservation of hundreds of square feet to store cars. Other sites will require removal of trees, gardens, and yards to make way for required automobile shelter. Portland has developed a residential permit program which should be approved as soon as possible to manage and mitigate the impacts of infill development on parking. Parking management, not required parking, is the solution to neighborhood concerns about parking supply.</p> <p>Sincerely,</p> <p>SE Yamhill St.</p>
11/26	<p>Hi,</p> <p>I live in SW PDX, Hillsdale area and our house is on a large corner lot zoned R7. We have a detached garage. When I received our tax bill I questioned if we could afford to retire in the neighborhood we have lived in for the last 30 years. This year's bill was a little shy of \$9000 so in 10 years I think it could be \$12000. I will be 72 and ready to stop working. To pay \$1000 a month in taxes could be a stretch. Anyway I was thinking building a smaller 2nd home(1550 to1800 sqft) might make sense for us. We could live in the smaller home and sell or rent the larger one (2750sqf). Besides leveraging our investment in our home it would allow us to stay in our neighborhood. If things don't change, (taxes going up and prices going up) I think you will lose the old people that live in the neighborhood because of</p>

	<p>the cost of living here. The neighborhood will become just full of 2 income, highly paid households. No more younger or older people. When we moved in we were the youngsters and had a good spread of age groups living here. I think that adds to a neighborhood.</p> <p>So I support your plan, making the neighborhood more affordable with more age groups and incomes. We have some flag lot houses here already and they haven't impacted the area in a negative way.</p> <p>Regards,</p> <p>SW Mitchell St., Portland OR 97239</p>
11/26	<p>I live in SE portland in the Mt Tabor area. My comments are as follows, please heed:</p> <p>Since we moved here approximately 12 years ago, Portland has changed, generally for the worse. Much more crowded, constant traffic congestions, expenses including heating, water, sewer, gas, electric, cable, property taxes, etc. all have become highly unaffordable, and so housing is hardly the only issue to tackle when determining that Portland has become unaffordable and less. Why single out housing and pretend that that is what's going to make this all change? Because developers and builders are running this show, and don't think we aren't aware of it. Look around every neighborhood and see how they have been newly overbuilt in terms of the new structures--too many to a lot, too large for the lots, stealing equity from the neighborhood by removing affordable, smaller homes, and the older and more charming ones--that was there to be plucked by dangled funds and permit fees. What made Portland appealing and why we came here is because it had a charm and a city feeling without being too packed, too homogenized (in terms of neighborhoods, housing, businesses, creative energy--very homogenized in terms of white vs. people of color sadly), too suburbanized. Now I can't say that so much.</p> <p>Also, why is all of this densification on the east side? Lots on the west side of portland are many times as large as the east, with many over 1/2 acre. Why are these lots being excluded from this densification if it is all so necessary? If each lot is a fat cell, and we want obesity, then each lot should be considered a safe fat haven. And why do we want this anyway? Because of some possible future in which we are severely overcrowded without any concern for if it is sustainable or desirable? If there is not enough room for more people, they will find somewhere else to go. That is the way it works. At some point there will be no more room--perhaps after we have garage apartments and basement ADUs, then we are full--which has not been detrimental to neighborhoods, rather than ruin more streets like Division with apartment after apartment building. Perhaps there is no end point when it is out of control, no point at which people start leaving due to the ruination of what was a sustainable and livable city, at least as far as current 'leadership' is concerned. So many decisions, from covering up the Mt Tabor reservoirs, building a boondoggle of a new reservoir, creating a massive and unnecessary chemical treatment plant in bull run, allowing businesses to superfund pollute our waterways and put up loud and ugly cell towers in the middle of a residential street, building code revisions willy nilly, will be looked back on as the graft and greed that it actually is, but it will be too late to reverse the decline of a once attractive place to live. Where else can we ruin next? I'm sure you'll think of somewhere. But the people who made this a fun and 'weird' and interesting place to live are leaving, and building tall skinny cheaply made duplexes wherever they can be crammed isn't going to bring them back. Ever.</p>

11/26	<p>Dear Morgan and Julia,</p> <p>I have been developing infill subdivisions in Portland for over 20 years, many of my projects have been used as examples for previous code update projects. I think there are some real problems with the RIP code changes. I made comments on earlier drafts but I'm not sure if they were read by the right people.....</p> <p>Anyway, here they are again:</p> <ol style="list-style-type: none"> <li>1. On 3 or more unit row house projects, interior row house lots can't have the same "FAR" as exterior row house lots!!!</li> <li>2. On upward sloping lots, tuck under garages have to be "tucked under" relative to the living space and grade of yard, not the sidewalk!!! If a lot is 5 feet above the sidewalk, which is pretty common, and the garage is tucked 4 feet under the sidewalk, you would need a staircase that would run the the entire length of the garage, making it no longer a garage that would fit a car....</li> <li>3. On a similar upward sloping lot you can't measure height from the bottom of a 5 foot retaining wall, it has to be measured from the yard around the structure...</li> <li>4. You can't increase the front setback if the structure has been pushed forward to accommodate rear vehicle access, on many lots there will be no room left for an adequate structure or private outdoor area.</li> <li>5. Detached ADU's create huge back yard building bulk, and completely eliminate backyard privacy and should not get such increably favorable treatment. The complaints are already out there!! ADU's that are part of the house are not only a much more sustainable use of resources, there are more energy efficient and flexible for multiple family needs. And by the way, the apartment market is crashing due to oversupply, apartment rents are starting to go down, fast.....</li> </ol> <p>I have done many projects that can be used as an examples for all of the above. And I have a great new row house design that i have currently submitted for final plat with Leah Dawkins that is two stories with tuck under garage and an ADU/in-law apartment incorporated within the house, it really is the perfect solution, but it won't be allowed! Is there any way you can help me get these points across before it is too late?????????</p> <p>Thank You,</p>
11/26	<p>If the City hopes to discourage construction of new housing in Portland's single family neighborhoods, the 2,500 sf cap on new construction would be a big step in that direction. Builders are bringing large homes to the market because a) that is where there is demand and b) the cost of new construction makes single family home construction at lower price points infeasible. As has been pointed out, Portland's SDC charges and other fees have been part of this high-cost structure.</p>

	<p>Another issue is important to consider. At least in my NE neighborhood, many of the small homes being replaced by much larger ones are owned by elderly and, often, low-income households. They have certainly benefitted from the long increases in the value of their homes. If new construction is no longer feasible because of restrictions on home size, some of the first citizens to bear the cost will be these low-income, elderly residents. Their 900-square foot homes will go from being worth \$425,000 to a market value of much less, as the value of the structure is far less than the current value of the site. This is, I'm sure, an unintended consequence, but one that is entirely predictable.</p> <p>The City should stand up to the existing residents who are bemoaning the changes in their neighborhoods. Cities evolve. Although I agree that the cost of housing in Portland is moving beyond affordability for many residents, arbitrary restrictions like the size of new homes will only exacerbate the problem.</p> <p>Thank you.</p>
11/26	<p>Thanks so much for your valiant efforts to get RIP right. It still needs work to achieve actual residential infill that helps our neighborhoods become more vibrant and walkable. I will be a signer on the Portland Small Developers Alliance letter that will be forthcoming shortly. Here, I want to raise an issue or two from my personal experience.</p> <p>One of the things this Oregonian editorial <a href="http://www.oregonlive.com/opinion/index.ssf/2017/11/where_a_home_for_everyone_coll.html">http://www.oregonlive.com/opinion/index.ssf/2017/11/where_a_home_for_everyone_coll.html</a> points out:</p> <p>"Consider one key proposal in the plan that calls for capping the size of new homes built on a typical single-family lot to 2,500 square feet. The limit is designed to mollify neighbors who want to block the building of so-called "McMansions" that have replaced some smaller-scale homes around Portland."</p> <p>I know several millennials who share a four bedroom house to make rent affordable for each of them. I did this myself earlier in my career. I fear that that cap will further limit such sharing in the future if we are not adding to that four bedroom supply because of this 2500 sf limitation.</p> <p>I also agree with the O's further comments on the 2500 sf cap: "First, there's future buyers. The 2,500 square-foot cap is lower than the average square footage of homes built in 2013, according to the Johnson report. ...With fewer builders and fewer homes, buyers will also have limited and more expensive choices. But current owners also lose out..."</p> <p>Please consider the comments Dani left in the "Comments" section of the article as well. Dani is Danielle Zeghib, who also co-authored the Portland Tribune My View article linked below with me--in fact, she did the lion's share of the work for it. We make several of the same points as the Oregonian--using our own calculations and experience.</p> <p><a href="http://portlandtribune.com/pt/10-opinion/377933-262545-my-view-residential-infill-project-needs-changes">http://portlandtribune.com/pt/10-opinion/377933-262545-my-view-residential-infill-project-needs-changes</a></p>

	<p>Please enter both articles into the record. Do let me know if URLs are adequate or do I need to send them as attachments?</p>
<p>11/27</p>	<p>Dear Morgan and Julia,</p> <p>Thank you so much for all of your hard work to come to terms with population growth in the city. I sincerely believe that the growth is being driven by forces beyond any one city's control and the test for all of us is to live our values as we grapple with big changes and make decisions on behalf of ourselves and future generations.</p> <p>My main concern is that to protect the health of all residents, we need to do a better job of balancing the tree canopy (and the huge rule it plays in human health and well-being) with transportation infrastructure and housing. I think we need to take a step back, again, and insure more room for private property trees behind and to the side of buildings, weaving large canopy trees throughout all neighborhoods, and not rely on the right-of-ways for all canopy.</p> <p>Why? One example is the fact that the Housing Opportunity Zone created in Inner Neighborhoods (one of the five BPS patterns) have major transportation corridors running through them. In particular, the Union Pacific Railroad line and the Brooklyn Yard have seen a four-fold increase in intermodal traffic in the last five years. This has meant a four-fold increase in the ultra fine particulate matter now known to be as dangerous to cardiovascular health as the larger particulate matter has been known to be to respiratory health. As population grows, delivery of goods into the city and through the city will only increase—pollution and its threat to human health will only increase.</p> <p>Of course, trees closest to the rail line and to highways such as 99E and SE Powell-HWY 26 may be said to be the most important members of the urban forest; however, trees throughout the zone are crucial as well. Why? Because not only is it important to capture particulate pollution, it is also crucial to maintain the oxygen producing capacity of large-form trees on private property, especially because the new code mandates small and medium-form, rather than large-form, trees under high voltage lines in the ROW. It is important to balance the loss of large-canopy trees in at least one third to one half of the ROW with large-canopy trees in private gardens. We are not Manhattan, nor are we San Francisco where ocean air clears out the pollution. We are an inland, river city subject to air inversion effects, summer and winter. We need the extra oxygen and while we do what we can to contend with over heard wires reducing canopy over the streets.</p> <p>Please, stay with the big questions, stay with the human health question in particular, Morgan. We want a city where people can live in health. Please do not give way to exchanging tree canopy for green roofs, reducing room for trees on private property, reducing the absolute number of trees. It is precisely because places such as our Inner Neighborhoods have such extensive transportation infrastructure that we must preserve existing canopy and preserve room for large canopy trees on the private side of the lot.</p> <p>Once lost, at a minimum, canopy will be lost for the 30 years the newly planted trees take to mature; at a maximum, canopy will be lost until the buildings themselves come down. Our</p>

	<p>health and the health of children born today depends on us maintaining the balance between housing density, transportation infrastructure and canopy through time.</p> <p>I will close by saying that being a member of the Urban Forestry Commission has improved my education regarding the urban forest, but that I am writing this letter on my own behalf. I have copied the commission and policy chairs out of courtesy to everyone.</p> <p>Thank you for your consideration,</p>
11/27	<p>Great work on the infill project. I have just one point of feedback.</p> <p>It'd be great if you could remove all minimum parking requirements. Let's encourage building housing for people rather than building housing for cars. Removing minimum parking requirements will allow for more infill, and get us moving in a positive direction for fighting climate change.</p> <p>Thanks so much for all you do and really excited about this project!</p>
11/27	<p>I generally support the RIP proposal, but it would be much improved by incorporating the recommendations of Portlanders For Parking Reform:</p> <p>Eliminate minimum parking requirements to preserve trees and remove barriers to duplexes, triplexes, and internal conversion.</p> <p>Allow the "housing opportunity" provisions in all areas of the city to improve equity outcomes and encourage the creation of additional walking scale neighborhoods.</p> <p>Make the affordable housing incentives workable to increase the likelihood that they will be utilized.</p> <p>Allow internal conversion of existing houses into multiple units in all areas, and provide additional incentives for housing preservation.</p> <p>Create a true cottage cluster code that will encourage the development of smaller, more affordable homes.</p>
11/27	<p>Dear Portland Staff -</p> <p>As a Portland homeowner, I strongly support efforts to strengthen the RIP draft.</p> <p>Most critically, we must remove requirements for off-street car parking. Requiring car parking is antithetical to Portland's values, undermines our efforts on climate change, and reduces possibilities for thoughtful affordable infill housing. While it may be politically difficult to slowly make people who own cars to pay for car storage on the street, it's the right thing to do.</p> <p>I also support a stronger cottage cluster provision, and allowing housing opportunity areas across the city.</p> <p>Thank you for your work on this effort.</p>

	<p>Warm regards, NE 14th Ave, Portland, OR 97212</p>
11/27	<p>Dear Portland City Council and Members,</p> <p>As a home owner of North Portland, and as a citizen, I support the residential infill project. Too many times I have seen older 5000 square foot lots with modest homes turned into enormous "McMansions" so developers can extract the most profits. The only reason why these gigantic homes are being developed, which I find are rarely occupied by the so-called "residents", is because zoning does not allow for these lots to become affordable cottages, duplexes, town homes, or garden apartments.</p> <p>The residential infill project does do quite a bit towards the goal of getting rid of regulations to allow for more variations of housing. If possible, we should expand the 'a' overlay zoning to ALL of Portland, so that homes outside the overlay do not become more vacation homes for the super rich.</p> <p>Additionally, the work to relieve developers from minimum parking requirements are encouraging, as each parking spot increases the price of what could be affordable homes.</p> <p>I only ask that you continue to work to relieve our city from regulations and hoops that prevent the myriad of affordable housing options from built.</p> <p>Sincerely, N Interstate Ave., Portland, OR 97227</p>
11/27	<p>Dear Staff:</p> <p>I'd already commented via the online survey November 26, but need to comment again because I had realizations about the fuller implications of the RIP Discussion Draft. First, the proposed FAR for an R5 5,000 s.f. standard lot is proposed at 2,500 s.f. (0.5 to 1 FAR) + 750 s.f. detached structure. For a scenario of a house and a detached ADU, this would crimp the present allowance per Tile 33.205.040C.3. of 75% of the living area of a house or 800 s.f., whichever is less. I urge revision of the proposal to allow up to 800 s.f. for an R5 detached structure.</p> <p>Second, regarding the R2.5 FAR, I urge revision of the proposal to allow up to 550 s.f. (not 375) for an R2.5 detached structure. Allowing for R2.5 a house plus a detached ADU that could be as large as the equivalent as a small one-bedroom apartment seems ideal. I worry about too many 375 s.f. detached ADUs on R2.5 lots compared to what housing need might actually be (that is, for larger units).</p> <p>Overall I realized the proposed FARs combined for both house and detached accessory structures would be so restrictive as to de facto neuter the proposals to allow a house to have up to two ADUs or a duplex with one detached ADU.</p> <p>Generally, I advocate capping the sizes of new houses themselves, but urge larger FAR allowance for a house with a detached ADU.</p>

	<p>If nothing else, the RIP needs to incentivize and not just mandate smaller houses. Being generous for detached ADUs will incentivize developers to in fact build smaller houses and also build detached ADUs and larger ones at that.</p> <p>Sincerely,</p> <p>SW Beaverton Hillsdale Hwy., Portland, OR 97221-2968</p> <p>Renter; residing in Portland 5-9 years; age 36; Latinx</p>
11/27	<p>We have comments specifically related to the map area currently excluded from the 'a' designation located east of NE 42nd Avenue between NE Killingsworth and NE Portland Highway. Our comments may also apply to other areas in the city.</p> <p>Much, if not all, of the excluded area described above is zoned R10 with an R5 comp plan overlay. This means that the property can be subdivided into R5 lots. However, in the current 'a' overlay plan, there is no contingency for dealing with R5 property resulting from such land divisions. (note: there currently are some R5 lots in this area that are called out and included in the 'a' overlay.) The lack of specificity related to emerging R5 lots in this area may have unintended consequences. Instead of stimulating the desired development of R5 properties while "preserving" the larger R10 properties for urban farming and planned development, it may actually stimulate more R10-to-R5 land divisions because the resulting R5 properties are not in the 'a' overlay and can avoid all related R5 zoning requirements. We believe--and recommend--that at this issue be address by: 1) specifying that all R5 properties resulting from land divisions within this non-'a' overlay area, automatically be included in the 'a' overly so as to be consistent with the other R5 properties in this area that are included in the 'a' overlay; and 2) continue to develop the specifications for Planned Developments for R10+ properties that optimizes density and green space.</p> <p>Regarding the second point above, a current R10 lot may not have the size or configuration for a cottage cluster development. In these cases, the property may be development with minimal density (1 house + 1 ADU); or the property may be divided into two R5 lots with a maximum density of two houses and two ADU's (or four ADU's if included in the 'a' overlay). The first option may maintain some green space, but may result in the building of a larger house + ADU and smaller yard. We would like to see some middle ground. It would be nice to have Planned Development configurations that work on smaller or more challenging R10 lots . From example, a Planned Development that could includes a house (2500SF max) + 2 external ADU's + XXX SF green space. This concept needs further development.</p> <p>In the spirit of full disclosure, We are property owners in the excluded area described above. We own two R10 (R5 overlay) properties and one R5 property (included in the 'a' overlay) in the area. We plan on developing one of the R10 lots within the next 5 years. It currently has one residence and an urban farm. We do not want the economics or zoning code to force us to subdivide or sub-optimize this land.</p> <p>Thank you for your consideration. [signed by two individuals]</p>
11/27	<p>In regard to the "Equity Lens", I think the city should take a day and visit west and north Cully (North of Prescott and West of 60th). This area is now fondly referred to as "Green Cully" and also "Hot Cully" because of the wonderful soil and large lots. Very few tenants</p>

	<p>live in my neighborhood because lots are snapped up by purchasers at prices that rival SW PDX. We are a few blocks from the Alberta Arts neighborhood and also, take a good look at what’s happening on NE 42nd. Restaurants are being added monthly. I think what the city considers “potential displacement impact” pertains to east Cully. I have lived here on Simpson Ct for 21 years. I know Cully well. Areas east of 60th and North of Killingsworth are high rental areas and should not be included. But if you move west of 60th and North of Prescott you will find mostly home owners. And, you would also find a lot of infill possibilities between Prescott and Killingsworth in the Cully neighborhood. Just fine tune your lens a bit. I am happy to help in any way possible. I am pro infill done correctly.</p>
<p>11/27</p>	<p>Generally the proposal is a step in the right direction, but I think the project proposal would be much stronger if it would:</p> <ul style="list-style-type: none"> <li>• Eliminate minimum parking requirements to preserve trees and remove barriers to duplexes, triplexes, and internal conversion.</li> <li>• Allow the “housing opportunity” provisions in all areas of the city to improve equity outcomes and encourage the creation of additional walking scale neighborhoods.</li> <li>• Make the affordable housing incentives workable to increase the likelihood that they will be utilized.</li> <li>• Allow internal conversion of existing houses into multiple units in all areas, and provide additional incentives for housing preservation.</li> <li>• Create a true cottage cluster code that will encourage the development of smaller, more affordable homes</li> </ul> <p>I additionally think the size allowed by new development should be larger if duplexes or multiplexes are bring built than for single family infill.</p> <p>NE Morris St., Portland</p>
<p>11/27</p>	<p>Dear Tom Berkowitz,</p> <p>Although I have lived in Portland since the late 1970's a return to the historical Portland of the 1970' and 80's is not what I'm yearning for: I have no desire to look 'exotic' compared to the rest of the population nor have all the restaurants closed on Sundays. Of course I don't want to lose the food, arts and culture Portland currently offers.</p> <p>These are not linked as some believe. We can have the benefits of growth while keeping neighborhoods intact and while including more voices. Portland can again become a model for how to grow thoughtfully and carefully. Urban planning was our notoriety at one time. With careful attention to protecting neighborhood character, encouraging specific home designs unique to each of Portland's neighborhoods and with more time for citizen's voices, we can work together to grow the new Portland that serves everyone.</p> <p>Let's slow the process down, listen to each other and learn. Then we as a city can discuss and carefully take into account: diverse neighborhood designs, the impact of one size fits all housing and the role of developers and builders.</p>

	<p>I call for a slowed down process not because I'm nearing 60 and curmudgeonly but because once gone, there's no returning the cottages of Multnomah Village, the bungalows of Boise Eliot, the 1500 sq foot homes on 7K lots in dairy land, rural SW.</p> <p>The current RIP instead of simply addressing growth is building a division in Portland. While the City and groups with paid lobbyists push for one thing, concerned citizens, many of whom carry the institutional history of Portland call for something else. This division is detrimental to Portland's growth.</p> <p>You may feel the City is too far down this path to consider other viewpoints. I implore you to slow this process down in order to help future generations enjoy the qualities in PDX for which they or their parents relocated here.</p> <p>The City can do better. And I will be the first to applaud a turn toward careful, thoughtful growth that includes more citizen input and restricts influence by developers and builders.</p> <p>I am happy to provide you with more detailed comments if you'd like.</p> <p>Thank you-</p>
11/27	<p>Dear Mr. Berkowitz,</p> <p>This is why I oppose the RIP. It will continue to destroy our Portland history. Please have the courage to slow down the process, harness developers for now and work with residents to plan a vote on the ballot for RIP.</p> <p>Thanks you-</p>
11/27	<p>Dear Planning and Sustainability team,</p> <p>Great work on the infill project.</p> <p>I have just one point of feedback:</p> <p>It'd be great if you could remove all minimum parking requirements.</p> <p>Let's encourage building housing for people rather than building housing for cars. Removing minimum parking requirements will allow for more infill, and get us moving in a positive direction for fighting climate change.</p> <p>Thanks so much for all you do and really excited about this project!</p> <p>NE Rodney Ave., Portland, OR 97212</p>
11/27	<p>City of Portland Bureau of Planning and Sustainability,</p> <p>I am writing in support of the Residential Infill Project as I support increased density in our city rather than expanding our boundaries. My hope is that infill addresses a variety of housing needs, with particular attention to low income housing. I particularly support the</p>

	<p>building of "skinny" houses on narrow lots. Having lived in such a house when I first moved to Portland, I know from experience that it can be a comfortable place to live.</p> <p>Sincerely,</p> <p>NE 58th Ave., Portland, OR 97213</p>
11/27	<p>Hello,</p> <p>I am responding in regard to comments by your department that you will not be including a "full" cottage cluster zoning option in the soon to be updated residential infill proposal.</p> <p>I heard about your lead planner, Morgan Tracy's opinions on the matter via an article by Michael Andersen, link to article here,</p> <p>I do not want to take Tracy's comments out of context as it might be construed in the article, so please forgive me if they have been, I would gladly look over official statements if you have them available.</p> <p>Going off what was quoted, Tracy states that in regards to cottage cluster communities, "There's a high interest; it's a great idea, lovely," he said. "I want to live in one. But the actual incidence of people doing it is very low." Tracy goes on to say, "Maybe there's more work to be done on it, but we didn't want to spend a disproportionate amount of time trying to flesh out what's essentially another project within this project," he said.</p> <p>I am a young architectural designer here in Portland and future home buyer. From discussions with my friends who are in a similar place in their lives that a lot of us are searching for alternatives to the suburban tract home developments that at this point is the only new homes we can afford. We need new approaches to the way we develop neighborhoods, with varying house size options for those of us who are okay with less space and prioritize community over size.</p> <p>I understand your department's limit in time and budget to address all the residential infill needs in the coming changes, but I'd like to add my voice to citizens who are eager for more options regarding infill lot development. Like Tracy states, there are a lot of Portlanders who would like to make this possible but I think undercutting that desire by saying no one is doing it currently is disingenuous.</p> <p>Please make more time to address a robust cottage zoning option. My generation of Portlanders are eager for better options in new homes.</p> <p>Regards,</p>
11/27	<p>I'm writing to comment on the Portland neighborhood zoning reforms. My ability to continue to live in Portland is predicated on significant reforming to our zoning code that will make abundant housing in walkable neighborhoods accessible, affordable, and available to me, my family, and my peers. I've lived in the region for nearly twenty three years, but without significant changes to our housing laws, I will no longer be able to afford to live in the town I call home. In addition, reforming our zoning code for more density and affordability will have numerous impacts on the efficacy of public transportation</p>

investments, hitting our carbon emission goals, air quality, and allowing my parents and grandparents to be able to age in place.

I strongly support the recommendations to bolster our zoning reform as proposed by Portlanders for Parking Reform and Portland For Everyone (as outlined below).

- Eliminate minimum parking requirements to preserve trees and remove barriers to duplexes, triplexes, and internal conversion.
- Allow the “housing opportunity” provisions in all areas of the city to improve equity outcomes and encourage the creation of additional walking scale neighborhoods.
- Make the affordable housing incentives workable to increase the likelihood that they will be utilized.
- Allow internal conversion of existing houses into multiple units in all areas, and provide additional incentives for housing preservation.
- Create a true cottage cluster code that will encourage the development of smaller, more affordable homes.
- Allow the “housing opportunity” provisions in all areas of the city to improve equity outcomes and encourage the creation of additional walking scale neighborhoods.
- Make the affordable housing incentives workable to increase the likelihood that they will be utilized.
- Allow internal conversion of existing houses into multiple units in all areas, and provide additional incentives for housing preservation.
- Create a true cottage cluster code that will encourage the development of smaller, more affordable homes.
- Rezone all historically narrow lots from R5 to R2.5, with design improvements, to share land costs and provide housing options that more families can afford.
- Support a healthy urban tree canopy by designing flexible code provisions that incentivize saving trees and creating less impervious surface.

Thanks for your consideration.

N Michigan Ave., Portland OR 97227

11/27

Please find attached my comments on the draft proposal of the Portland Residential Infill Project.

Thank you,

[From attachment:]

Greetings,

I am a Certified Planner and architectural designer with a history of work in the fields of urban design, low-income housing and real estate market analysis. I am also a member of the AIA/APA/ASLA Urban Design Panel and a member of the policy committee of Restore Oregon. I am writing to offer my commentary on the current draft proposal of the Residential Infill Project (RIP). The following are my comments and observations.

The residential infill project attempts to address Portland's housing shortage by creating increased capacity principally in the R2.5 and R5 zones. It does so by creating a "housing opportunity" overlay zone that applies to most lots. The intention is laudable but the execution falls short, largely as a result of attempting so many compromises that it satisfies none of its core aims satisfactorily.

The RIP's limitation on FAR on new single-family homes is a welcome change, but is still far too generous. A survey of median new home area reveals that the new homes being constructed in most neighborhoods are not significantly larger than the new .5 FAR, which translates to 2500sf on a typical lot. In many neighborhoods, median new construction homes are less than 100sf larger than the cap. The cap is still too high to disincentivize demolition of existing homes.

Ideally, a one for one replacement of single-family square footage on a given lot would reduce the market incentive to replace single-family homes in kind.

When single-family homes are demolished, replacement with multiple unit buildings should be strongly encouraged, and with preference to maximize units created.

The city should develop form-based guidelines that establish the preferred look and feel of homes in a given zone rather than prescribe arbitrary unit counts.

Unit counts in the "a" overlay zone are too low to effectively achieve stated aims. Historic typologies exist for four-plexes through 12 unit bungalow courts. These typologies consistently perform well on visual preference surveys. They often yield up to 52 units per net acre, while a generic single-family block averages about nine. Allowing single-story bungalow courts and similar on double lots could add greater capacity and thereby absorb growth more efficiently, provided adequate form based guidelines are created to ensure consistency with vernacular typologies.

The city has no comprehensive inventory or ranking of historic homes and other structures. The city needs to establish an inventory to prioritize maintenance of the highest quality, most historically significant residential architecture.

Preservation incentives should be increased; FAR bonus for maintenance of existing structures should be increased. The embodied energy and carbon of existing buildings alone makes a strong case for incentivizing preservation.

	<p>Off street parking should not be required in any instances. Requiring it encourages inefficient land use, drives up housing costs and reduces our ability to develop more housing on existing vacant parcels.</p> <p>The displacement assessment draws precisely the wrong conclusions; avoiding the areas excluded by the analysis ensures that pressure on existing properties will increase. Failure to add additional capacity in these areas is counterproductive and exacerbates gentrification pressures rather than ameliorating them.</p> <p>Thank you for your consideration.</p> <p>Sincerely,</p> <p>NE 6th Place, Portland, OR 97212</p>
11/27	<p>City of Portland,</p> <p>I am writing to indicate my general support for the residential infill project. The City of Portland is growing, and housing policies are critically important for the City to accommodate the people who are seeking to call Portland home. I appreciate the elimination of parking requirements for homes on narrow lots, the higher FAR limits on properties that include ADUs, and the creation of the A overlay zone to increase housing diversity.</p> <p>I would like the City to also consider the following changes to the RIP:</p> <ul style="list-style-type: none"> <li>• Eliminate parking minimum requirements for all housing and let the private sector decide how much parking is necessary to construct. <ul style="list-style-type: none"> <li>○ This requirement would support housing affordability, promote infill development, reinforce the city's mode share targets, preserve the urban tree canopy, and provide uninterrupted sidewalks.</li> <li>○ If this change is not a politically-feasible requirements at this time, consider: <ul style="list-style-type: none"> <li>▪ the elimination of minimum parking requirements in areas with existing or planned on-street parking permit programs and/or areas in proximity to publicly-available parking lots or garages</li> <li>▪ a parking maximum (set relatively low or set to 0) for areas within 500 feet of MAX and/or frequent bus</li> </ul> </li> </ul> </li> <li>• Allow the Additional Housing Opportunity overlay zone ('A' overlay zone) in all areas of the city.</li> <li>• Include outdoor off-street parking spaces in the parking supply calculations (i.e. allow carports and outdoor uncovered off-street parking spaces to count toward the minimum and maximum parking requirements).</li> </ul>

	<ul style="list-style-type: none"> <li>• Allow internal conversion of existing homes into multiple units in all areas of the city.</li> <li>• Create a cottage cluster code that can encourage development of smaller, more affordable homes.</li> </ul> <p>Thank you for the opportunity to comment.</p> <p>NE 75th Ave., Portland 97213</p>
11/27	<p>Hello,</p> <p>I'm a concerned mother of two and 14+ year resident of Inner Southeast Portland, between Hawthorne and Belmont, on 33rd near Sunnyside School (for the past 4 years; 25th and Salmon before that.)</p> <p>I understand that relatively wealthier people want to move and live in my neighborhood. But we who have lived here have INVESTED in our community, our neighbors, our schools and our families. In the past 2-3 years, our area has rapidly declined in livability with the influx of large, character-less apartment buildings with no parking and no tie-in to our community. This has displaced many and also encouraged drug users and other street gang-type groups to feel emboldened by their new relative anonymity to become aggressive towards children and women, mostly, on our pretty streets.</p> <p>Why are you doing this? Why don't you care about all of us who have invested in our neighborhoods and built our lives here? Why are you ignoring our pleas to leave our already loved and vibrant neighborhoods alone? Consider building in areas that are lacking vibrancy. We are literally fighting for our lives. We put down roots and you are trying to uproot us!! The changes are coming too fast and furious, and our areas are suffering.</p> <p>Small examples: I helped the kids at my daughter's school, Sunnyside Environmental School, paint the mural on the exterior of the 5th grade classrooms and plant the native garden there. We take care of the school chickens many times per year, which delights my kids. I volunteer to walk the school grounds and pick up garbage, scan for drug paraphernalia, and generally help with looking out for the safety of 'our' (collective) kids. I CARE about my community!! I'm dedicated to my neighborhood! What happens when we are forced out?</p> <p>Please STOP this RIP before it's too late and so many of us have to drag our children out of their schools and away from their friends and neighbors, just so other people can live here, instead of us. It's not fair and it's not right. You all in charge will go down in history as those who are responsible for destroying our town and forcing out those who have invested their lives here. You are literally killing Portland: Rest In Peace if R.I.P. goes through.</p> <p>It's not too late to do the right thing.</p> <p>Thanks for reading,</p>
11/27	Greetings:

I am appalled that the Residential Infill Project (RIP) incentivizes demolitions, proposing sweeping changes and rezoning that dispense with decades of land-use planning.

Scale: Either count the total square footage of the project toward the 2,500-square-foot limit, or delete this meaningless provision entirely. Excluding the top and bottom floors of new builds from the calculation does a disservice to people who are led to believe this part of RIP will make a difference. The “limit” as proposed would not have affected more than 99 percent of new construction built in recent memory; it preserves developers’ business as usual. It is disingenuous to suggest otherwise, and damages the credibility of planners and RIP in general.

Housing “opportunity” area: For whom? Whenever you offer a multi-unit payout on what had been a single-family lot, you encourage demolitions. The official outline for RIP (handout of 9/10/15) was to “explore the feasibility and appropriateness of alternative housing options,” never mentioning a wholesale rezoning. Shame on you for taking a project sparked by good intentions and turning it into a weapon to use against Portlanders, many of whose life savings are in their home and its attendant values assured by zoning. Let’s build on vacant land only—we have plenty.

Narrow lots: City Council specifically voted down development of these lots on Dec. 7, 2017. Why, then, is this topic resurrected, and apparently through a process occurring outside the public view? As Sandra Wood said then at City Council, a prohibition on building on narrow lots “doesn’t treat accidents of historic platting as a reason for upzoning.” ([www.youtube.com/watch?v=mQR-kErpaNI&t=4831s](http://www.youtube.com/watch?v=mQR-kErpaNI&t=4831s))

What to keep: Given the flawed process and imbalanced makeup of the committee drafting the proposal, few parts of the proposal serve to guide better development. They are: the new way of measuring height of new builds, a limit on the number of steps to the front porch, and some elements of the new setback provisions (see the “RIP-SAC 7” stance on this).

We’re paying for good planning; let’s see it. I hope the bureau will work to restore public trust, finding ways to maintain our finite resource of old-growth, “green,” and affordable housing.

Without the city’s leadership in creating a sustainable path forward for new development, activism at the ground level and direct confrontation at open houses and other events will continue to make an impact and force change up from the grass-roots level as we educate and inform neighbors about the outside effects of teardown development, from hazmat dispersal to higher home prices.

[Follow up sent via email on 11/27:]

Sorry—I made a mistake. The date of the City Council session referenced was Dec. 7, 2016 (not 2017). Thank you for correcting!

11/27	<p>Please see the attached .pdf document containing my commentary on the Residential Infill Project Discussion Draft. Please include this in the official public record. A link to the online document is also provided. Embedded in the .pdf document is also a link to a video version of this testimony. This testimony (along with a variety of supporting documentation) has also been posted and shared on a variety of social media platforms, including a change.org petition. As such, I recommend that you read and review rather than simply scan and file.</p> <p><a href="https://drive.google.com/file/d/1yZoMpjjEKWNSoks6m2E0QTpYM-JjTah3/view">https://drive.google.com/file/d/1yZoMpjjEKWNSoks6m2E0QTpYM-JjTah3/view</a></p>
11/28	<p>RIP Program Managers:</p> <p>Summary:</p> <p>I am writing to object to the rezoning plan for the Roseway neighborhood in the current RIP plan draft. The draft proposes to rezone the <i>*majority*</i> of the neighborhood to R2.5. This is both unfair to our neighborhood, and ignorant of the physical conditions of the neighborhood. Please amend by reducing the number of rezoned lots.</p> <p>Details:</p> <p>In the current interactive map, over 60% of the Roseway neighborhood is slated to be rezoned as R2.5. No other neighborhood is singled out this way, and no reason is given for why Roseway should be targeted to house the single largest portion of the city's infill.</p> <p>The reasons given for the rezoning are "near services". However, Roseway is considerably further out than (for example) Irvington, where there will be <i>*no*</i> rezonings. It appears that this rezoning map was based more on rezoning less wealthy neighborhoods, than based on where is sensible for greater densities of housing. As written, this is a plan to destroy the Roseway neighborhood.</p> <p>So my first objection is: this plan singles out Roseway for wholesale conversion of the entire neighborhood for no good reason.</p> <p>Second, the "near services" assesment seems to be based on looking at a map rather than visiting the neighborhood. While Roseway is service by multiple bus lines, retail service vendors within walking/biking distance are extremely limited. As a result, living in Roseway requires a car, often multiple cars per family. The streets in Roseway are <i>*extremely*</i> narrow (some are not even paved), to the point where they are almost impassible if there are cars parked on both sides. Any increase in density will be accompanied by an increase in street parking, as one can already see on the streets in Roseway where infill housing exists.</p> <p>If rezoned as the draft plan indicates, you will create a crisis situation with Roseway parking and traffic. I raised this issue at the public plan viewings this summer, and was promised that it would be taken into consideration. I see that it has not been.</p> <p>So, second objection: The neighborhood cannot absorb that amount of infill without the streets becoming impassible.</p>

	<p>Suggested Remedy: the rezoning plan should be amended to rezone no more than two properties per block. This would be a 10% net increase in density which the neighborhood could absorb without destruction.</p> <p>Additional needed rezonings should come from neighborhoods which currently are failing entirely to shoulder the burden of additional density.</p> <p>Roseway, Portland, OR</p>
11/28	<p>As a homeowner in the Roseway neighborhood, I DO NOT want the residential infill project to move forward in my neighborhood. This neighborhood is primarily single family free-standing houses. Please keep it that way. We do not want higher density in the Roseway neighborhood.</p>
11/28	<p>I strongly oppose the infill plan that effects the Roseway neighborhood. I have been a resident of this neighborhood for over 17 years. One of the many things I appreciate about this neighborhood is it's residential feel. Allowing more building per lot would only cramp our neighborhood and make it feel more urban. I find it curious that this infill project isn't effecting the more affluent neighborhoods like Sellwood, Laurelhurst or Irvington which are all very accessible as far as public transit is concerned, more so than Roseway. I guess this must be the Trump effect trickling down to Portland, the rich get their way and the rest get the shaft.</p> <p>Thank you for considering this opinion.</p> <p>NE 79th Ave., Roseway PDX 97213</p>
11/28	<p>Thank you for seeking public feedback about the proposed changes to infill and zoning rules.</p> <p>I feel that, generally, the proposal is solid, but would ask in addition that the following be considered:</p> <ul style="list-style-type: none"> <li>• Eliminate minimum parking requirements to preserve trees and remove barriers to duplexes, triplexes, and internal conversion.</li> <li>• Allow the "housing opportunity" provisions in all areas of the city to improve equity outcomes and encourage the creation of additional walking scale neighborhoods.</li> <li>• Make the affordable housing incentives workable to increase the likelihood that they will be utilized.</li> <li>• Allow internal conversion of existing houses into multiple units in all areas, and provide additional incentives for housing preservation.</li> <li>• Create a true cottage cluster code that will encourage the development of smaller, more affordable homes.</li> </ul> <p>Thank you,</p> <p>SE 24th Ave. Portland, OR 97214</p>

11/28	<p>Hey we have enough skinny houses that fill our skinny streets with all the cars the have no place to park. And with no parking patrol except when called it is making it hard to have a joyful life here in Portland. Do we need in fill? These are our areas to live and we should have say in what happens in them. Before you pass something it should be required to be in your neighborhood first. Just so you in charge can experience what it's like to live with before you change where I live. Get in touch with your city not the developers and not speculators. If someone one the committee actually reads this thank you</p> <p>Rose City Park neighborhood</p>
11/28	<p>I reviewed the proposed revision to my Roseway neighborhood and I find it telling that another modest middle class neighborhood is possibly getting gentrified. Filling in empty lots or building on 82nd is one thing but our streets are narrow and our homes simple. Squeezing in three story row houses with no parking is not good! Please reconsider your plans for MY neighborhood.</p> <p>Thank you, NE 78th</p>
11/28	<p>I am writing in support of the Residential Infill Project. Please adopt with the following amendments:</p> <ul style="list-style-type: none"> <li>• Eliminate minimum parking requirements to preserve trees and remove barriers to duplexes, triplexes, and internal conversion.</li> <li>• Allow the “housing opportunity” provisions in all areas of the city to improve equity outcomes and encourage the creation of additional walking scale neighborhoods.</li> <li>• Make the affordable housing incentives workable to increase the likelihood that they will be utilized.</li> <li>• Allow internal conversion of existing houses into multiple units in all areas, and provide additional incentives for housing preservation.</li> <li>• Create a true cottage cluster code that will encourage the development of smaller, more affordable homes.</li> </ul> <p>Sincerely,</p> <p>NE Portland</p>
11/28	<p>I am concerned that housing density is going to increase in the Roseway neighborhood. There are several apartments and numerous “skinny houses” already, but this should not become the dominant type of dwelling in a neighborhood that is mostly single-family homes.</p> <p>I have seen what is being offered to increase density and it is disturbing. Apartments of several stories with little or no parking for residents is not the solution. New building should reflect the current style of housing.</p> <p>I live at 72nd and Klickitat. There are already apartments and businesses within a block or two of my house. The lots in this neighborhood are generally 50'x100', very small to begin</p>

	<p>with. If two houses per lot, or ADUs in backyards becomes the norm, we will have lost our identity as a neighborhood.</p> <p>Sincerely,</p>
11/28	<p>As a Roseway neighborhood resident, I have to say this is one of the shadiest plans I've ever seen hoisted on neighborhoods. Below are comments previously submitted by a neighbor, but I agree with everything he said. I hope you will reconsider this horrible plan.</p> <p>RIP Program Managers: Summary: I am writing to object to the rezoning plan for the Roseway neighborhood in the current RIP plan draft. The draft proposes to rezone the *majority* of the neighborhood to R2.5. This is both unfair to our neighborhood, and ignorant of the physical conditions of the neighborhood. Please amend by reducing the number of rezoned lots. Details: In the current interactive map, over 60% of the Roseway neighborhood is slated to be rezoned as R2.5. No other neighborhood is singled out this way, and no reason is given for why Roseway should be targeted to house the single largest portion of the city's infill. The reasons given for the rezoning are "near services". However, Roseway is considerably further out than (for example) Irvington, where there will be *no* rezonings. It appears that this rezoning map was based more on rezoning less wealthy neighborhoods, than based on where is sensible for greater densities of housing. As written, this is a plan to destroy the Roseway neighborhood. So my first objection is: this plan singles out Roseway for wholesale conversion of the entire neighborhood for no good reason. Second, the "near services" assesment seems to be based on looking at a map rather than visiting the neighborhood. While Roseway is served by multiple bus lines, retail service vendors within walking/biking distance are extremely limited. As a result, living in Roseway requires a car, often multiple cars per family. The streets in Roseway are *extremely* narrow (some are not even paved), to the point where they are almost impassible if there are cars parked on both sides. Any increase in density will be accompanied by an increase in street parking, as one can already see on the streets in Roseway where infill housing exists. If rezoned as the draft plan indicates, you will create a crisis situation with Roseway parking and traffic. I raised this issue at the public plan viewings this summer, and was promised that it would be taken into consideration. I see that it has not been. So, second objection: The neighborhood cannot absorb that amount of infill without the streets becoming impassible. Suggested Remedy: the rezoning plan should be amended to rezone no more than two properties per block. This would be a 10% net increase in density which the neighborhood could absorb without destruction. Additional needed rezonings should come from neighborhoods which currently are failing entirely to shoulder the burden of additional density.</p>
11/28	<p>City of Portland you are destroying the livability and affordability of Portland. Instead of cramming more people into a square block and padding your taxes collections with more money how about stopping the demolition and encouraging remodeling. There is a shortage of affordable houses not housing. Most people can no longer find affordable rents and are forced to move out of Portland. Destroying \$500k homes with \$1.2 million homes is not the answer nor cramming more homes in a lot. Enough is enough!!!</p>
11/28	<p>Todd,</p> <p>Thanks for asking!</p>

These are just some thoughts: I have no idea how difficult they would be make happen , but I will throw them out.

- Small team employed by the city to identify neighborhoods with older homes which have potential for re-hab/renovation to raise the quality of their street and their own lives. Focus on struggling neighborhoods with potential but never on communities which are planned for higher densities (generally those areas on major arterials).
- Contact the owners of these homes to raise awareness of city, county, state and federal programs which could help them...and share the survey results with similar government/quasi-government agencies which want to help homeowners improve their homes (such as Solar Oregon).
- Sign up and vet area contractors who are willing to do quality work at a discount. These contractors must pass rigorous standards: not any one should qualify.
- Take applications for no-interest loans for up to \$20,000 projects (large enough to cover smaller projects), with emphasis on low-income or limited-income homeowners (with emphasis on homes they actually live in, but people who rent homes at lower rates to low or limited income people may also qualify). Projects should have their work done through the contractor pool when contractors have the correct expertise for the job. Environmentally responsible materials should be used and historic design elements should be emphasized.
- Energy conservation, roofing, downspout disconnection/on-site drainage, solar water heating, photo-voltaic generation systems, siding, painting, window repair, nuisance abatement, sidewalk construction or fixes, re-piping, electrical work to bring up to code, foundation, sewage line work, earthquake retrofitting...these are some of the areas I can think of immediately which have neighborhood, environment and social consequences and help the homeowner of an older home.

I also think the city can do more to support and encourage house moving when good houses are located in a place where it no longer makes sense from a long term plan perspective. I remember that Eugene Oregon had such a program back in the mid-to-late 70s. I saw brochures and neighborhood organizations actively engaged in connecting builders with lot owners and finding a way to preserve older homes in new locations. Moving a good building to a new location is a time-honored tradition which is important to-day, yet so often ignored. The city itself can help find the lots for these re-locations. Empty lots: probably not! However, maybe one lot with a house too far gone to save yet in an otherwise good neighborhood...paired with a house of similar vintage and compatible style which is surrounded by gas stations, storefronts and apartment buildings on a main arterial. Rather than have two separate contractors tear both down, find ways to convince one contractor to demolish and set a new foundation for the other old house...then move the other old house.

Thanks,

North Heppner Ave., Portland, OR 97203

11/28

Yes, we need higher housing density housing, and, yes, we need changes in development rules for single family homes (sfrs). But we really can have greater density without demolition of good quality homes - more units. But we need to stop knocking down good housing stock and stop allowing it to be replaced by super-sized new houses. We can add units without undermining the overall good qualities that make people want to come to the sfr neighborhoods.

As an ADU dweller myself near Hawthorne, I've come to value the environmentally sound approach of keeping good housing stock while adding a new housing unit. We can increase density this way:

- 1) Broaden rules to allow more sfr lots to add ADUs and more to have more than 1 ADU.
- 2) Allow lots eligible for 2 ADUs to combine allowed square footage into one 2-bedroom unit.
- 3) And key: Allow interior conversions of sfrs to 2 or more units, depending on size of the lot.

Yes, demolition is sometimes the answer if the housing was poor quality or beyond repair. We just took down a 613 square foot cottage with lots of problems, like a sub-standard bathroom squeezed in to replace the outhouse in 1946, a place we kept "alive" until our wonderful handyman retired. But it was never one of the quality old homes and I bought it knowing it had a limited life, nearly all the value being in the land.

But the last few years many of the demolitions, particularly in southeast, have been of good homes that could have survived, with some becoming 2 or 3 units. To seriously encourage higher density, ADUs & interior conversion, please support these recommendations for the Residential Infill Project:

- Limit new housing in inner city 50x100 lots to 2500 square feet.
- REDUCE FEES on ADUs & on Interior conversions of sfrs to 2-4 units.
- Work with local lenders to encourage loans for ADU & interior conversions. One policy suggestion is that banks roll completed ADU units from construction loans into one new mortgage including the main house so they have greater security leading to more lending.
- URGENT: If conversions & ADUs are to add to housing stock then, rules for AIRBnB usage must be strictly set up and enforced.
- BDS should look into standards for modular ADUs that might enable faster construction.

	<p>Please let's go forward to a final housing plan that represents additional density but without tearing down valuable housing stock.</p>
<p>11/28</p>	<p>I am writing to express my opposition to the RIP. The city council of Portland is quickly developing a reputation for ignoring the wishes of its citizens in order to follow its own agenda. I am hopeful that this email does not fall on deaf ears.</p> <p>Creating additional housing at the expense of single family property owners is both unfair and ineffective. There is more than enough poorly utilized commercial property in this city that can be converted to higher density apartment buildings.</p> <p>As for ADU's.... allowing my neighbor to convert his or her property into a money making business for short term renters is a crime for two reasons. One, it reduces the right to the peaceful enjoyment of my property as I watch endless streams of people and their luggage go into and out of my neighbors property. Two, I have looked at the economics of ADUs. They do not pencil out as rentals. They only pencil out as additional space for family or as Airbnb short term stays. They will not increase the supply of housing for Portland residents. I understand that there is a shortage of housing, but the solution is not to wring every last nit of character from this city.</p> <p>One more thing. As you bring down the cost of rentals, the reduced rates will simply attract more residents from Los Angeles, Seattle, and Portland. It will be like a dog chasing its tail. This city can barely keep up with maintaining basic roads, sewers, and other essential services.</p> <p>Please do the right thing and kill this endeavor.</p>
<p>11/28</p>	<p>Dear Portland Planning Bureau -</p> <p>I am writing in regards to Residential Infill project. In the current interactive map, over 60% of the Roseway neighborhood is slated to be rezoned as R2.5. No other neighborhood is singled out this way, and no valid reason is given for why Roseway should be targeted to house the single largest portion of the city's infill.</p> <p>The reasons given for the rezoning are "near services". However, Roseway is considerably further out than neighborhoods such as Irvington or Laurelhurst, where there will be no rezonings. It appears that this rezoning map was based more on rezoning less affluent neighborhoods than on how to sensibly create increased density within Portland.</p> <p>Further, the near services assessment seems to be based on looking at a map rather than visiting the neighborhood. While Roseway is served by multiple bus lines, retail service vendors within walking/biking distance are extremely limited. As a result, living in Roseway requires a car, often multiple cars per family. The streets in Roseway are extremely narrow (some are not even paved), to the point where they are almost impassible if there are cars parked on both sides. Any increase in density will be accompanied by an increase in street parking, as one can already see on the streets in Roseway where infill housing exists. If rezoned as the draft plan indicates, you will create a crisis situation with Roseway parking and traffic. The neighborhood cannot absorb that amount of infill without the streets becoming impassible.</p>

	<p>Again, it seems unfair that one neighborhood should be singled out for such expansive (and damaging) change. I support more density but it needs to be done thoughtfully and spread out among all the Portland neighborhoods, not just in the less affluent areas.</p> <p>Thank you,</p> <p>NE Morris Street, Portland, Oregon 97213</p>
11/28	<p>Sullivan’s Gulch is already one of the densest neighborhoods in the City. It is approximately 75% rental with many apartment buildings (including courtyard apartments) and condominiums. With its wealth of middle housing types, it is certainly not the typical neighborhood of single-family homes. Many of our older homes have been converted to duplexes, triplexes, and quads over the years. As a very small neighborhood, there is no space for a park, no space for a school, and little space for a community garden. With developers willing to purchase early 1900s homes for over \$850,000, just for a large corner lot (R192979), in order to deconstruct the house and build duplexes, how will our existing homes survive the new code?</p> <p>The Residential Infill Project should achieve a balance between the need for density and encouraging development consistent with the character and health of our neighborhoods. Sullivan’s Gulch has for many years seen large-scale multi-family development that many other single-family neighborhoods have yet to see. Thus the objections to the proposed code expressed by other neighborhoods that are afraid of the type of development that already characterizes Sullivan’s Gulch. For a neighborhood like ours, internal conversions of existing homes should be the standard means to increase density, not infill. Also, regulating density by the absolute number of units could actually lead to less density than regulating by form and scale, which encourages internal conversions or new buildings that exceed current FAR while preserving a type of housing consistent in scale and appearance with the surrounding neighborhood.</p> <p>The Residential Infill Project should be more discriminating as to the individual character of neighborhoods, especially those adjoining Central City. We have recently seen the development of Grant Park Village Phase 1, with Phase II already under construction. Additional apartment buildings near NE 28th and Broadway are currently in planning stages. Right next door and directly facing Sullivan’s Gulch we will soon see extremely intense housing developments at 1400 NE Multnomah (next to Holladay Park) and 1510 NE Multnomah (next to Lloyd Center). Very soon, housing density in our area will be more than sufficient to accommodate a significantly larger population. In fact, the market is already showing signs of cooling and many of these later developments may be challenged by a lower rate market for rentals.</p> <p>Do not apply a cookie-cutter approach to neighborhoods like Sullivan’s Gulch that already meet the City’s need for middle housing. Concentrate efforts to promote density with vertical development in Central City and an emphasis on internal conversions wherever possible in neighborhoods.</p> <p>Thank you for the opportunity to comment on the Residential Infill Project.</p> <p>NE Multnomah Street, Portland, OR 97232</p>

11/28	<p>Generally the proposal is a step in the right direction but I think the project proposal would be much stronger if it would:</p> <ul style="list-style-type: none"> <li>• Eliminate minimum parking requirements to preserve trees and remove barriers to duplexes, triplexes, and internal conversion.</li> <li>• Allow the “housing opportunity” provisions in all areas of the city to improve equity outcomes and encourage the creation of additional walking scale neighborhoods.</li> <li>• Make the affordable housing incentives workable to increase the likelihood that they will be utilized.</li> <li>• Allow internal conversion of existing houses into multiple units in all areas, and provide additional incentives for housing preservation.</li> <li>• Create a true cottage cluster code that will encourage the development of smaller, more affordable homes.</li> <li>• Or just up-zone the whole city and be done with it!</li> </ul> <p>Thanks,</p>
11/28	<p>To whom it may concern:</p> <p>As a 31 year resident of an east side 1920’s planned neighborhood, I question the claim that the Residential Infill Project will achieve the twin goals of density and affordability for future residents.</p> <p>What gets built and/or sold in our neighborhood are market-rate houses. Any multi-unit building would similarly be built and sold at market-rate.</p> <p>Our neighborhood would be best served by focusing on density as an achievable goal— incentives for internal conversions, ADU’s and an occasional duplex scaled to fit into the existing neighborhood.</p> <p>Affordability is simply wishful thinking as our land and house market values are far above the median price in Portland. Nothing in this neighborhood would be priced to be affordable— owner-occupied or rental.</p> <p>Wholesale demolition of quality bungalows, Tudors and mid-century moderns for replacement with duplexes and triplexes is not the answer to either density or affordability.</p> <p>The Residential Infill Project is shortsighted at best, harmful at its worst.</p>
11/28	<p>Hello,</p> <p>I broadly support the discussion draft, but I want to suggest a few ways that it could be improved. First, I suggest eliminating minimum parking requirements. Second, I support</p>

	<p>expanding the housing opportunity areas to all parts of the city. Finally, I support allowing internal conversions of existing housing in all areas of Portland.</p> <p>Regards,</p> <p>SE 36th Ave., Portland, OR 97214</p>
11/28	<p>I've not commented on the Residential Infill Project previously.</p> <p>I believe much of the plan will make a bad situation worse.</p> <p>The housing crisis is being driven by both limited supply and inflated land values. Inflated land values result in the situation where, even if new units are built, they are too expensive because of the cost of acquiring the land. Up-zoning large areas will only exacerbate the problem by further inflating land values. This will make all houses less affordable.</p> <p>The Infill Project has not done a sufficient economic analysis on the effects the zoning changes will have on land values and the resulting effects on housing affordability. Instead of encouraging demolition of affordable housing and the building of new housing that will be unaffordable, we should be trying to decrease land values and focus our density efforts on ADUs and internal conversions of existing houses.</p> <p>Up-zoning should be much more selective and along transportation corridors instead of the entire inner Eastside. And why is the Westside and outer Eastside not part of this?? There is plenty of build-able land in Outer Eastside and Westside. I can only conclude that the City is trying to maximize profits for developers.</p> <p>In addition to the major flaws described above, there are other problems:</p> <p>The proposed limits on house sizes are too weak. Basements should be included in the calculations. And the proposed limit is much bigger than the average house size in Portland. Setbacks should match the existing houses on a street-by-street basis.</p> <p>Heights need to be more tightly controlled to match the existing houses on the street.</p> <p>This plan seems to be all about increasing density at the expense of affordability. Affordability should be the primary driver. Existing housing stock should be retained and modified to increase density. ADU's in existing houses and internal conversions should be a bigger part of this plan because they do not destroy neighborhoods, will not inflate land values, and will provide housing that is more affordable.</p> <p>NE Hoyt Street</p>
11/28	<p>To the Residential Infill Project Discussion Draft</p> <p>Main question to you is</p> <p>Do you care and respect if Portland retains the quality of life built into it's older neighborhoods??? If you do then you really need to rethink the way you are phrasing the push on this Residential Infill Project. This zoning change treats every area the same.</p>

	<p>Portland is not an old city like the east coast. To me this makes all our older neighborhood even more valuable. Value measured in it's history and the citizens who built it. To push this zoning change on all these neighborhoods is close to the damage done in the past to many parts of the city like the Lloyd district, Eliot district, and others. The movement by some larger old neighborhoods relying on historic designation to save themselves is like "who gets the lifeboat when the ship is sinking. Fortunately we are all historic after 50+ years.</p> <p>I followed and participated in the Portland Comp Plan and thought it was a job well done. A lot of time was presented so that citizens could have thoughtful discussions. I call this Residential Infill Project an after thought added on too quickly. It makes it very suspicious to get it done in favor of developers. In the comp plan discussions I saw committees that had majority of members related to developers and real estate. Progress is not defined by only those communities. I hope this is not happening here. Please check.</p> <p>I live in the Sullivan Gulch neighborhood. It is one of the densest neighborhoods in the City. It is about 75% rental with many apartment buildings (including courtyard apartments) and condos. Many of the older homes had been changed to duplexes, triplexes, and quads during the WWII years and the 50's. We have been there, done that, and should not be asked to do it again. We are an example of how your proposal can work but can be done too much. For a neighborhood like ours, internal conversions of existing homes should be the standard means to increase density, not infill. A developer just purchased a beautiful 1906 home in Sullivans Gulch for 850K on a larger lot R192979 and demolished the house and plans double housing with no talking to neighborhood on plans. No intention of joining in neighborhood decussion. Just do what you want because you can. A real problem in Portland is this attitude and I do not see it solved in this Residential Infill Project Discussion Draft.</p> <p>The Residential Infill Project should be more discriminating as to the individual character of neighborhoods, especially those adjoining Central City.</p> <p>Do not apply a cookie-cutter approach to neighborhoods like Sullivan's Gulch that already meet the City's need for middle housing.</p> <p>Thank you for making sure you are providing ways to comment now and in the future. As you progress I hope to contribute more to your work.</p> <p>NE Multnomah St., Portland Or 97232</p>
11/28	<p>I am worried and saddened to see the changes that are being proposed about development in Portland. I have seen negative impacts in Multnomah Village since I have moved in. The bungalow house behind us was bulldozed along with trees and vegetation to build a huge home. We had to pay to have drainage put in due to the flooding in our backyard, not to mention the loss of trees and privacy. It is nearly impossible to park in front of our street during the weekday. I can't imagine how it will be when the new apartment buildings are occupied. We don't have sidewalks and I fear I'll back into a child attending the martial arts studio near by house when I pull out of my driveway. This is not the neighborhood for this kind of development. We moved here because it was a smaller family oriented neighborhood. We prefer it to Hawthorne, NW 23rd, Division, Alberta. Please don't turn us into that. It isn't the character we choose for our family.</p>

	<p>I support those provisions of the Residential Infill Project (RIP) that retain the character of the existing neighborhoods. Reducing the scale of new housing, measuring building heights from the lowest point of the lot, and averaging setbacks will allow infill to blend into the neighborhoods. These provisions will assure that Portland grows in a way that protects the great place that it is today.</p> <p>I oppose the RIP's A overlay that will affect 85,000 properties in the City. It adds capacity that is not needed. The Draft 2035 Comprehensive Plan clearly states that there is more than enough capacity under the current zoning for the growth that is projected through 2035. There is no need to add additional capacity for 85,000 units of unaffordable housing or 170,000 units of affordable housing. The RIP's A overlay adds these capacities by increasing the number of housing units allowed in the base zones. It will turn single-family zones into multifamily zones. I do not accept the flawed concept of the A overlay.</p> <p>If additional capacity is needed, then I support land-use planning best practices that require that base zones be changed in the Comprehensive Plan with community input. This approach would be consistent with Oregon's Land Use Goals. I urge you to remove the A overlay from the RIP. Please add this to the record.</p> <p>Thank you,</p> <p>SW 34th Ave., Portland OR 97219</p>
11/28	<p>I am very concerned that the extremely large area of proposed infill in Roseway will destroy the look and feel of the neighborhood. The type of home that is usually built on a 2500 square foot lot does not conforming to the look and style of homes already here. Besides the non-conforming look of these "skinny" homes, they also tower over their neighbor, blocking sunlight and eliminating privacy, thus reducing outdoor enjoyment, not to mention market value.</p> <p>In addition, by not having a driveway or garage for cars, the streets will be further cluttered with parked vehicles. This neighborhood is not close enough into the city and other walkable amenities for most people to live here without a car or two. This is already an issue in our neighborhood, as many of the homes have only single car garages.</p> <p>The skinny homes on smaller lots will also decrease yard size and much needed green space. We need more than just public parks for enjoyment of the outdoors, we need our gardens! They are places for urban farmers to grow their own food and for enthusiasts to garden and create healthy environments for us and for the birds, insects and other urban wildlife that benefit our whole ecosystem. Because of our tall fir trees and proximity to the Colombia River watershed, we are visited by owls, bald eagles, hawks and osprey. The attached photo was taken recently from the top of a fir tree in a neighbor's yard right across the street from my house.</p>

	<p>Roseway has been able to maintain the lovely early and mid-century feel as when it was first platted, it would be a shame to see so much infill happening in one neighborhood that would completely change the “vibe”. Our neighborhood is unique and with lots of history and appeal.</p> <p>People walk the neighborhood here for enjoyment – to take out their dog or children, get some exercise and wave at their neighbor doing yard work. Allowing over half of Roseway to be rezoned as proposed will change it to a crowded and cluttered neighborhood with car lined streets, no room for trees and gardens while developers shove in any kind of non-conforming home they can in order to make the biggest profit.</p> <p>I know infill is inevitable, and that the city is growing. I am also in the business of selling houses! I’m not opposed to growth, but I also I know from personal experience, that part of the appeal of Portland is due to the livability and charm of our neighborhoods, and those include the ones that are not as wealthy as Eastmoreland and Irvington. It seems as though the infill areas should be spread out more equally into all areas of the city, and not just shouldered by a few.</p> <p>[Email attachment included a photo of two eagles in a tree.]</p>
11/29	<p>Hello</p> <p>I think that the limitation of 2,500 per home is too restrictive. The cost of permits, land, construction, etc. are so great that it will discourage new construction. I think the city should allow three-plex buildings on corner lots, with up to 4,700 square feet total of living space.</p> <p>Thank you</p>
11/29	<p>RIP</p> <p>The comments below were prepared by Buckman resident [redacted by staff]. I agree with her comments, and wish to enter my remarks in the record as opposed to the RIP as presently drafted.</p> <p>“See below my comments on the proposed residential infill zoning amendments.</p> <p>Scale of new houses</p> <ul style="list-style-type: none"> <li>• In the single family zone, an FAR greater than 0.5 is not appropriate. For FAR greater than 0.5, the result will be more like townhomes.</li> <li>• Limiting the FAR will also prevent inappropriate heights.</li> <li>• Fully below-grade basements could be exempted from FAR. Half-basements or walk-out basements need to count toward FAR.</li> </ul>

- Allowing internal conversions to save historic housing is a good idea. Street-facing facades must be preserved in an internal conversion.
- Ensure that creation of ADU's increases supply of owner-occupied or long-term rental property, and does not go toward increasing short-term rentals.

#### Housing Opportunity Overlay

- Creating more housing that is affordable and accessible is important.
- The blanket approach toward densifying does not respect the immense work that went into the Comprehensive Plan and wipes out all of the nuances in long-range planning that support Portland built character.
- As currently defined, the overlay will only precipitate demolition of historic, economically viable housing to line pockets of investors.
- The overlay does not take into account infrastructure.
- The overlay basically destroys single family house zoning and does not acknowledge the fact that single family home ownership/rental is desirable within the city; not allowing it puts pressure on the Urban Growth Boundary by people who want this housing choice.
- The concept of town centers, walkability and livability is not reflected in this blanket densification; this is not good planning. Planning is not just about housing.

#### Narrow lots

- Narrow lots do not support the architectural character of Portland except in Old Town.
- Narrow lots will create a street wall of garage doors at pedestrian level, which is incompatible with current zoning code.
- Allowing narrow lot subdivision in R5 zones is UPZONING, which goes against City Council's recommendation and also contradicts the myriad zoning studies which took place during the Comprehensive Plan.

#### Conflict of interest

By allowing committee members on the RIP with self-serving interests, this zoning amendment project is benefitting those people at the expense of Portland's individual neighborhoods, historic character and livability.

City Council's refusal to recognize this fact is inexcusable. In other cities and states, allowing committee participants who have a vested interest in the outcome of the committee recommendations is considered a crime.

	<p>I am deeply disappointed in the direction Portland has taken.</p> <p>Sincerely,</p> <p>NE 15<sup>th</sup>, 97212</p>
11/29	<p>Our town is quickly and quietly becoming a city. To accommodate the change city planners should perhaps change some of their antiquated and staid attitudes toward infill and allow more projects that make sense to go forward. Affordable housing would help this situation a lot. We are not going back in time. Thank you for your consideration.</p>
11/29	<p>To whom it may concern:</p> <p>I have attended your “informational” meetings on the new RIP A overlay and I am appalled by the lack of consideration the city has given to long-term residence in the area. While my property taxes increase with every new bond measure my property value decreases with the RIP plan and people living in RVs in neighbor’s driveways! I spoke to a project representative and asked how the city planned to address parking on our narrow neighborhoods streets and I was told it was not the city’s concern. It’s just going to be the wild wild west of parking out here. I have already been woken up early in the morning by garbage trucks honking their horns because somebody parked on the narrow street in front of my house and they couldn’t get through. To add insult to injury - I live on a street that is not maintained by the city. As neighbors, we all pitch in to maintain this street but as the increase of capacity continues, the cost of the street maintenance goes up with NO ADDITIONAL FUNDS from people now using the street and certainly nothing from the city. It’s a gravel street so the increased traffic increases the dust and debris all over our homes. Cramming more people into a well-established small neighborhood just breeds resentment, transitive tenants and property decline.</p> <p>I oppose the RIP's A overlay that will affect 85,000 properties in the City. It adds capacity that is not needed. The Draft 2035 Comprehensive Plan clearly states that there is more than enough capacity under the current zoning for the growth that is projected through 2035. There is no need to add additional capacity for 85,000 units of unaffordable housing or 170,000 units of affordable housing. The RIP's A overlay adds these capacities by increasing the number of housing units allowed in the base zones. It will turn single-family zones into multifamily zones. I do not accept the flawed concept of the A overlay.</p> <p>SW Falcon St., Portland, OR 97219</p>
11/29	<p>I support increasing landfill and using our city lots more efficiently; however, I see nothing about tree preservation. This week we had our 10th large (50 - 70 year old) fir tree removed from the neighborhood due to development. This is just in the last 5 years. During the same time period the city determined we needed more evergreen trees (please see my attachment.)</p> <p>We are losing our old growth trees unnecessarily. Development MUST incorporate more environmental protections. Currently if a lot is 5,000 square feet or larger the developer gets an exemption from preserving trees. That's most standard lots within city limits, which essentially means THERE ARE NO PRESERVATION codes in place for the trees we need the most.</p>

	Thank you for your time,
11/29	<p>Dear RIP Staff,</p> <p>Below are my comments on the latest draft RIP Proposal.</p> <p>It is disappointing that staff did not produce a proposal that responded to requests from the community and the City Council to reduce the barriers to tree preservation and planting.</p> <p>Even more frustrating are the proposals in the new draft to increase the front lotline set back to 15'. This will REDUCE the flexibility to arrange structures on lots in a way that avoids and minimizes impacts to existing trees. It is unacceptable that staff would go in the opposite direction as requested by the community and the City Council.</p> <p>I am request that staff do the following:</p> <ol style="list-style-type: none"> <li>1) The RIP should not increase the minimum front setback from 10' to 15'. INstead it should reduce the front setback to 0 if doing so will allow for the preservation of an existing tree above a threshold size. This allowance should be automatic and not require the developer to seek a variance.</li> <li>2) The RIP should waive any required off-street parking if doing so would allow the preservation or creation of a street tree planting location by eliminating the need for or removing access across an existing green strip.</li> </ol> <p>I would also request that the RIP carry with it a recommendation to remove the Title 11 exemption for sites under 5000 square feet or at very least reducing this exemption to 3500 square feet as propsoed in the original draft of Title 11 produced in the Citywide Tree Project. The City either needs to make it easier to avoid trees on these small sites (something the current RIP proposal emphatically does not do) or apply the Tree Code to these sites. The currenet proposal does neither, adding barriers and development capacity that in some instances (with the allowance for 2nd ADUs in some situations) will increase current development pressure to remove trees and tree planting sites. This is bad policy practically for the City of Portland and poltically for the RIP.</p> <p>I support many of the provisions of the RIP including the proposal sfor a 2nd ADU. But it is unacceptable that advance these proposals in a way that so neglect the City's goals to preserve and plant more trees.</p> <p>Sincerely,</p> <p>N. Vancouver, Portland, OR 97217</p>
11/29	<p>If you insist on using the increased density that we do not require--At least be honest about the sales tactics. What is it? The increased tax revenue? Pandering to the developers? Trying to create construction jobs? Could you take care of of the homeless situation first. Give the developers incentive to build high density low income housing outside the neighborhoods, rather than unaffordable "affordable housing".</p> <p>Residential Infill Project Director Morgan Tracy, Residential.infill@portlandoregon.gov</p>

	<p>Portland City Council - Council Clerk, cputestimony@portlandoregon.gov</p> <p>Re: Draft Residential Infill Project - Remove the A Overlay</p> <p>I support those provisions of the Residential Infill Project (RIP) that retain the character of the existing neighborhoods. Reducing the scale of new housing, measuring building heights from the lowest point of the lot, and averaging setbacks will allow infill to blend into the neighborhoods. These provisions will assure that Portland grows in a way that protects the great place that it is today.</p> <p>I oppose the RIP's A overlay that will affect 85,000 properties in the City. It adds capacity that is not needed. The Draft 2035 Comprehensive Plan clearly states that there is more than enough capacity under the current zoning for the growth that is projected through 2035. There is no need to add additional capacity for 85,000 units of unaffordable housing or 170,000 units of affordable housing. The RIP's A overlay adds these capacities by increasing the number of housing units allowed in the base zones. It will turn single-family zones into multifamily zones. I do not accept the flawed concept of the A overlay.</p> <p>If additional capacity is needed, then I support land-use planning best practices that require that base zones be changed in the Comprehensive Plan with community input. This approach would be consistent with Oregon's Land Use Goals. I urge you to remove the A overlay from the RIP.</p> <p>Please add this to the record. Thank you,</p> <p>SW Capitol Hill Rd., Portland OR 97219-2638</p>
11/29	<p>Residential Infill Project Director Morgan Tracy, Residential.infill@portlandoregon.gov Portland City Council - Council Clerk, cputestimony@portlandoregon.gov Re: Draft Residential Infill Project - Remove the A Overlay</p> <p>I support those provisions of the Residential Infill Project (RIP) that retain the character of the existing neighborhoods. Reducing the scale of new housing, measuring building heights from the lowest point of the lot, and averaging setbacks will allow infill to blend into the neighborhoods. These provisions will assure that Portland grows in a way that protects the great place that it is today.</p> <p>I oppose the RIP's A overlay that will affect 85,000 properties in the City. It adds capacity that is not needed. The Draft 2035 Comprehensive Plan clearly states that there is more than enough capacity under the current zoning for the growth that is projected through 2035. There is no need to add additional capacity for 85,000 units of unaffordable housing or 170,000 units of affordable housing. The RIP's A overlay adds these capacities by increasing the number of housing units allowed in the base zones. It will turn single-family zones into multifamily zones. I do not accept the flawed concept of the A overlay.</p> <p>If additional capacity is needed, then I support land-use planning best practices that require that base zones be changed in the Comprehensive Plan with community input. This approach would be consistent with Oregon's Land Use Goals. I urge you to remove the A overlay from the RIP.</p>

	<p>Please add this to the record.</p> <p>Thank you,</p>
11/29	<p>Residential Infill Project Director Morgan Tracy, Residential.infill@portlandoregon.gov Portland City Council - Council Clerk, cputestimony@portlandoregon.gov</p> <p>Re: Draft Residential Infill Project - Remove the A Overlay</p> <p>I support those provisions of the Residential Infill Project (RIP) that retain the character of the existing neighborhoods. Reducing the scale of new housing, measuring building heights from the lowest point of the lot, and averaging setbacks will allow infill to blend into the neighborhoods. These provisions will assure that Portland grows in a way that protects the great place that it is today.</p> <p>I oppose the RIP's A overlay that will affect 85,000 properties in the City. It adds capacity that is not needed. The Draft 2035 Comprehensive Plan clearly states that there is more than enough capacity under the current zoning for the growth that is projected through 2035. There is no need to add additional capacity for 85,000 units of unaffordable housing or 170,000 units of affordable housing. The RIP's A overlay adds these capacities by increasing the number of housing units allowed in the base zones. It will turn single-family zones into multifamily zones. I do not accept the flawed concept of the A overlay.</p> <p>If additional capacity is needed, then I support land-use planning best practices that require that base zones be changed in the Comprehensive Plan with community input. This approach would be consistent with Oregon's Land Use Goals. I urge you to remove the A overlay from the RIP.</p> <p>Please add this to the record.</p> <p>Thank you,</p>
11/29	<p>To give an example as to why I think the RIP is too restrictive, I will give my house as an example. I live at 26 NE 32nd Ave., on a corner lot. My well-built one-story house has a foot print of about 1136 square feet. The proposed rule would let me tear it down and put up three very small apartments. That however would not be practical economically for me, and if I kept one, it would be too small for me.</p> <p>If I could tear my house down, and build three attached units of 1,700 square feet each, I would consider it. I would keep one and sell two in condominium form. Since my lot is an average of about 6 feet above the sidewalk, I could even tuck a garage under each unit.</p> <p>Lacking economic motivation though, I will keep my house as it is.</p> <p>Thank you</p>
11/29	<p>I support those provisions of the Residential Infill Project (RIP) that retain the character of the existing neighborhoods. Reducing the scale of new housing, measuring building heights from the lowest point of the lot, and averaging setbacks will allow infill to blend into the</p>

	<p>neighborhoods. These provisions will assure that Portland grows in a way that protects the great place that it is today.</p> <p>I oppose the RIP's A overlay that will affect 85,000 properties in the City. It adds capacity that is not needed. The Draft 2035 Comprehensive Plan clearly states that there is more than enough capacity under the current zoning for the growth that is projected through 2035. There is no need to add additional capacity for 85,000 units of unaffordable housing or 170,000 units of affordable housing. The RIP's A overlay adds these capacities by increasing the number of housing units allowed in the base zones. It will turn single-family zones into multifamily zones. I do not accept the flawed concept of the A overlay.</p> <p>If additional capacity is needed, then I support land-use planning best practices that require that base zones be changed in the Comprehensive Plan with community input. This approach would be consistent with Oregon's Land Use Goals. I urge you to remove the A overlay from the RIP.</p> <p>Please add this to the record.</p> <p>Thank you,</p> <p>SW Moss St., Portland, OR 97219</p>
11/29	<p>To BPS</p> <p>My comments in this email are directed to whether RIP does anything to solve the so called housing crisis. After review, my answer is no.</p> <p>Having spent 33 years on the board of Central City Concern and working on numerous low income housing projects, 0-30 % mfi, and working with other nonprofits, such as Reach in their niche of 30-60 % mfi, I know for sure that there is a Real affordable housing crisis, defined as housing for those families and individuals under 60% mfi. Given the increases in prices and rents, the crisis now extends upward to at least 80% mfi and perhaps to 100% mfi, at least in the close in neighborhoods.</p> <p>RIP does not solve the crisis as I have defined it. RIP will not produce housing for these families and individuals. It will continue the demolitions, the badly designed infill, and the further gentrification of our city. You will not deal with the real issues with FAR and a density bonus. You need real funds, real subsidies, just like the subsidies used by CCC and Reach, only the dollar amounts will be less, but still significant.</p> <p>The last 5 years of building has not dented the real crisis, even though many of the policies and programs in place and used by builders were designed for "affordable" housing. In RIP, there is no mandate for affordability, there are no controls on prices and rents, and there are no limitations on using this new housing for Airbnb or VRBO or other short term rentals. Nothing.</p> <p>Without such assurances, I am sadden and frustrated that the City is willing to throw out decades of work to strengthen and improve single family housing in this City, one of its great strengths for an unknown and untested program like RIP.</p>

	<p>My first involvement with city planning was the Model Cities program with service on its governing board starting in 1968. Eight inner northeast neighborhoods were part of the Portland model cities program, because residents were leaving, crime was up, schools were losing enrollment, and property values were down. I know I live in one of those neighborhoods, Irvington, starting in 1967, and I ran for the board of Model Cities. We were redlined because of our location in Irvington. A main focus of Model Cities was to improve single family neighborhoods and schools. To me, RIP is a big slap in the face for 50 years of work to improve a wonderful multicultural, multigenerational neighborhood, like Irvington, with its wide mix of homes, large and small, and architectural styles. I remember demolitions taking a toll on Irvington homes, and the formation of a neighborhood association to fight it. Then City policies in the 50s and 60s were encouraging builders to demolish old homes and make way for apartments. The ironic thing is that those apartments, built in the 60s and early 70s, after 50 years, may now be providing the most affordable rents in Irvington. Perhaps the City is hoping for some trickle down affordability, but a 50 year wait does not justify RIP. Plain and simple RIP will not work, it will not solve the affordable housing crisis.</p> <p>NE 15th Ave., 97212</p>
11/29	<p>Dear RIP,</p> <p>The comments below were prepared by Buckman resident [redacted by staff]. I agree with her comments, and wish to enter my remarks in the record as opposed to the RIP as presently drafted. The issues considered are very important to the future fabric of our city, and I believe Portland can - and should - do better.</p> <p>“Scale of new houses</p> <ul style="list-style-type: none"> <li>• In the single family zone, an FAR greater than 0.5 is not appropriate. For FAR greater than 0.5, the result will be more like townhomes.</li> <li>• Limiting the FAR will also prevent inappropriate heights.</li> <li>• Fully below-grade basements could be exempted from FAR. Half-basements or walk-out basements need to count toward FAR.</li> <li>• Allowing internal conversions to save historic housing is a good idea. Street-facing facades must be preserved in an internal conversion.</li> <li>• Ensure that creation of ADU's increases supply of owner-occupied or long-term rental property, and does not go toward increasing short-term rentals.</li> </ul> <p>Housing Opportunity Overlay</p> <ul style="list-style-type: none"> <li>• Creating more housing that is affordable and accessible is important.</li> </ul>

- The blanket approach toward densifying does not respect the immense work that went into the Comprehensive Plan and wipes out all of the nuances in long-range planning that support Portland built character.
- As currently defined, the overlay will only precipitate demolition of historic, economically viable housing to line pockets of investors.
- The overlay does not take into account infrastructure.
- The overlay basically destroys single family house zoning and does not acknowledge the fact that single family home ownership/rental is desirable within the city; not allowing it puts pressure on the Urban Growth Boundary by people who want this housing choice.
- The concept of town centers, walkability and livability is not reflected in this blanket densification; this is not good planning. Planning is not just about housing.

Narrow lots

- Narrow lots do not support the architectural character of Portland except in Old Town.
- Narrow lots will create a street wall of garage doors at pedestrian level, which is incompatible with current zoning code.
- Allowing narrow lot subdivision in R5 zones is UPZONING, which goes against City Council's recommendation and also contradicts the myriad zoning studies which took place during the Comprehensive Plan.

Conflict of interest

By allowing committee members on the RIP with self-serving interests, this zoning amendment project is benefitting those people at the expense of Portland's individual neighborhoods, historic character and livability.

City Council's refusal to recognize this fact is inexcusable. In other cities and states, allowing committee participants who have a vested interest in the outcome of the committee recommendations is considered a crime.

I am deeply disappointed in the direction Portland has taken.

NE 8th Ave., Portland, OR 97212

11/29	<p>I respectfully urge you to Eliminate the A Overlay for the Multnomah Village area. It encompasses our entire village and will add such density as to completely change the neighborhood we know and love.</p> <p>It has not been been yet proven that this is a necessary change for the future.</p>
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	Thank you,
11/29	<p>Hi, I live and own in inner SE Portland and would like to express my support for the Residential Infill Project. We need more housing options closer in if this city is every going to achieve its climate, sustainability and affordability goals. I would suggest going further and:</p> <ul style="list-style-type: none"> <li>• Eliminate minimum parking requirements to preserve trees and remove barriers to duplexes, triplexes, and internal conversion.</li> <li>• Allow the “housing opportunity” provisions in all areas of the city to improve equity outcomes and encourage the creation of additional walking scale neighborhoods.</li> <li>• Make the affordable housing incentives workable to increase the likelihood that they will be utilized.</li> <li>• Allow internal conversion of existing houses into multiple units in all areas, and provide additional incentives for housing preservation.</li> <li>• Create a true cottage cluster code that will encourage the development of smaller, more affordable homes.</li> </ul> <p>Its not fair or just that existing property owners can veto growth and development in their neighborhoods. I own a small house on a 1600sqft lot, its is more than enough for our family. We should allow many more houses in these inner city neighborhoods.</p> <p>Thanks,</p> <p>SE Oak St., Portland OR</p>
11/29	<p>I support those provisions of the Residential Infill Project (RIP) that retain the character of the existing neighborhoods. Reducing the scale of new housing, measuring building heights from the lowest point of the lot, and averaging setbacks will allow infill to blend into the neighborhoods. These provisions will assure that Portland grows in a way that protects the great place that it is today</p> <p>I oppose the RIP's A overlay that will affect 85,000 properties in the City. It adds capacity that is not needed. The Draft 2035 Comprehensive Plan clearly states that there is more than enough capacity under the current zoning for the growth that is projected through 2035. There is no need to add additional capacity for 85,000 units of unaffordable housing or 170,000 units of affordable housing. The RIP's A overlay adds these capacities by increasing the number of housing units allowed in the base zones. The RIP's A overlay:</p> <ol style="list-style-type: none"> <li>1. Arbitrarily turns single-family zones into multifamily zones.</li> <li>2. Incrementally increases the supply of unaffordable housing units while destroying the character of long-established single-dwelling units.</li> <li>3. Will not increase affordability of housing.</li> </ol>

4. Fails to address swelling traffic issues resulting from an influx of residents.
5. Fails to address the impact RIP would have on infrastructure such as schools, roads and sewage systems.
6. Fails to address more nuanced zoning that adjusts based on the unique qualities of different lots and neighborhoods.
7. Fails from a lack transparency and genuine public accommodation. I do not accept the flawed concept of the A overlay.

I do not accept the flawed concept of the A overlay.

I request that you eliminate the A Overlay in Multnomah and come up with a more neighborhood friendly way of locating density to accommodate growth.

If additional capacity is needed, then I support land-use planning best practices that require that base zones be changed in the Comprehensive Plan with community input. This approach would be consistent with Oregon's Land Use Goals. I urge you to remove the A overlay from the RIP.

Finally, I believe the current RIP recommendations are so incredibly far-reaching – affecting every person living and/or doing business in Portland – that the RIP recommendations should be placed on the ballot for a final-decision by the voters.

Please add this to the record.

Thank you,

SW Dolph Court, Portland, OR 97219

11/29	<p>SE Portland needs more affordable housing and less demolition&gt;profit driven poor quality structures</p> <p>SE Thorburn St</p>
11/29	<p>We lose magnificent trees, we gain unsightly boxes to house people whose cars will clutter our neighborhoods because the Council idealistically believes if there is public transport nearby the tenants will not own a car. The neighbors beg to differ. We are less committed to affordable housing, or even well designed housing, than to maximizing profit and density. Streets that once were charmingly diverse become gentrified into glass and concrete monotony.</p> <p>The people living on the streets invade yards and steal packages and sleep in doorways, so neighbors must cope as they can. Our policeman will not even pursue the theft of a car or a bike, so neighbors must do it.</p> <p>I have lived in Sunnyside for over 30 years and shake my head in disbelief at the pace of change and the loss of so much that made our city charming, safe and green.</p>

11/29	<p>This is to provide comments on the Residential Infill Project. My comments are based on the Discussion Draft available from your Web site.</p> <p>I support the "Scale of Houses" revisions that will help preserve the character of neighborhoods.</p> <p>On the other hand, I believe that the 'a' overlay zone is far too aggressive in increasing density in some other areas, especially in the inner SE (where my family lives). Although Inner Southeast areas are near transit, they also are historically single-family neighborhoods with narrow streets. Allowing TWO ADUs or a duplex with an ADU essentially triples density. Density would be quadrupled if units are "affordable," a standard that often has been abandoned by landlords after building is done. This increase in density is an abandonment of the zoning principles established in these neighborhoods -- and for what?</p> <p>Deleterious effects of increased density include noise, crowding, air pollution, reduction of sunlight for existing residents, excessive dogs and cats in the neighborhood, and too many cars seeking parking. Excessive parking on these narrow streets reduces visibility for drivers, bicyclists, and pedestrians; visibility is already poor due to narrow streets. (Although transit is available, many if not most Portlanders who can afford it have a car, which can be necessary for doing errands, transporting children, seeking medical care, or visiting recreation areas.) Not all these housing areas are close to parks, and children play in the streets regularly. Increased density will make this more dangerous for them.</p> <p>Furthermore, tripling density in existing single-family areas is totally unnecessary, as plenty of underdeveloped land exists further east. Why destroy attractive neighborhoods, rather than build up those that could benefit from development? It would be far more logical to expand housing and other amenities in areas east of SE 82nd Avenue, and that would provide more affordable housing, as well. Let the developers pay for the needed changes -- they are the ones profiting from it.</p> <p>Truly yours,</p> <p>SE Grant Street, Portland, OR, USA 97214</p>
11/29	<p>I'm a resident in SE. I wanted to send a quick note of support for RIP. I'm worried a vocal minority is going to prevent progress to our city in a NIMBY style, so I wanted to make sure to write in support.</p>
11/29	<p>Hello RIP Committee -</p> <p>I'm writing to urge you to keep the Minimum Front-Yard Setback in R-5 and R-2.5 at 10'.</p> <p>I am seriously considering building a small ADU toward the front of the extra half lot between my house and my neighbor's. I'd like to build it a bit closer to the street than the main house, to maintain a more open side yard/garden behind the ADU.</p> <p>Also, I think that homes closer to the sidewalk are nice, because they provide a more "urban" streetscape where residents sitting on their porches can easily chat with passers-by. Please note that this comment refers to Table 110-3 as well as section 33.110.225 Setbacks.</p> <p>Thanks for your consideration.</p>

	SE 33rd Avenue
11/29	<p>Rather than including a long list in my own words, I would like to refer you to the work of United Neighbors for Reform. By my thinking, their critiques and suggestions make the most sound sense for our fair city as it tries to carefully and thoughtfully integrate low-income, young people, old people, all colors of people in such a way that they have a fair chance to have a place of their own -- as renters or owners (without destroying what is already here). Even though my submission is just barely more than a one-liner, my analysis and conclusions after having been exposed to the RIP off and on for some months now and after careful thought, are heartfelt and are carefully and, it is to be hoped, responsibly submitted.</p> <p>Living in a very old house since 1980 in inner, inner SE Portland</p> <p>I hope this reaches you. I don't supposed there is any way you can acknowledge receipt of this input. I know the deadline is tomorrow.</p>
11/29	<p>According to a post on Nextdoor.com, a majority of Roseway will be rezoned from R-5 to R-2.5. The post also says, "The planners really appear intent to turn this neighborhood into 100% duplexes." This is my opinion on this: The R-2.5 dwellings we have now are abominations--causing disgust and hatred. Well, maybe that is too strong of a word, but you get my point that all of the skinny houses are very out-of-place unless there are several together on a block. So, why not allow duplexes that are connected and present a more pleasing appearance. I am not opposed to denser housing nor to duplexes IF they are designed in ways that are pleasing to look at and that match the neighborhood.</p> <p>Thank you.</p> <p>Portland, Oregon</p>
11/29	<p>Greetings Planning and Sustainability!</p> <p>I enthusiastically support the Planning and Sustainability Bureau rezoning the approximately 7,000 'narrow' lots, so they can be developed with smaller homes or duplexes. All Portland neighborhoods need to come together to help with solutions to the crisis of too few homes available, and certainly too few affordable homes. Any city that cannot grow and adapt to changing times, and do so with a diverse population is bound to lose much of the character that made it desirable in the first place. It is shameful that so many lots are potentially available, and they might not be developed to help so many of our citizens. Especially, since so many are already close to schools, stores and services, and they would enrich any neighborhood. I am a real 'tiny house' enthusiast, and many of us are very much for smaller housing footprints and more density, both of which help the environment. I hope you will continue to look at the bigger picture, and help to solve the bigger problems of housing that affect us all. Allowing development of these lots would be a step in the right direction; thanks for your consideration!</p> <p>Sincerely,</p>
11/29	<p>As a longtime Buckman resident, I am deeply disappointed in the direction Portland has taken.</p>

See below my comments on the proposed residential infill zoning amendments. May it be noted that by allowing committee members on the RIP with self-serving interests, this zoning amendment project is benefitting those people at the expense of Portland's individual neighborhoods, historic character and livability.

City Council's refusal to recognize this fact is inexcusable. In other cities and states, allowing committee participants who have a vested interest in the outcome of the committee recommendations is considered a crime. Why are we allowing that here??

With the comments below, compiled by a small group, I hope you will reconsider.

#### Scale of new houses

- In the single family zone, an FAR greater than 0.5 is not appropriate. For FAR greater than 0.5, the result will be more like townhomes.
- Limiting the FAR will also prevent inappropriate heights.
- Fully below-grade basements could be exempted from FAR. Half-basements or walk-out basements need to count toward FAR.
- Allowing internal conversions to save historic housing is a good idea. Street-facing facades must be preserved in an internal conversion.
- Ensure that creation of ADU's increases supply of owner-occupied or long-term rental property, and does not go toward increasing short-term rentals.

#### Housing Opportunity Overlay

- Creating more housing that is affordable and accessible is important.
- The blanket approach toward densifying does not respect the immense work that went into the Comprehensive Plan and wipes out all of the nuances in long-range planning that support Portland built character.
- As currently defined, the overlay will only precipitate demolition of historic, economically viable housing to line pockets of investors.
- The overlay does not take into account infrastructure.
- The overlay basically destroys single family house zoning and does not acknowledge the fact that single family home ownership/rental is desirable within the city; not allowing it puts pressure on the Urban Growth Boundary by people who want this housing choice.
- The concept of town centers, walkability and livability is not reflected in this blanket densification; this is not good planning. Planning is not just about housing.

	<p>Narrow lots</p> <ul style="list-style-type: none"> <li>• Narrow lots do not support the architectural character of Portland except in Old Town.</li> <li>• Narrow lots will create a street wall of garage doors at pedestrian level, which is incompatible with current zoning code.</li> <li>• Allowing narrow lot subdivision in R5 zones is UPZONING, which goes against City Council's recommendation and also contradicts the myriad zoning studies which took place during the Comprehensive Plan.</li> </ul> <p>Small Business Owner   Retired Portland Public School Teacher   Home Owner</p> <p>Buckman neighborhood resident, 97214</p>
11/29	<p>We are writing to add our voices to the many opposed to the Residential Infill Project. Our objections are as follows:</p> <p>First and foremost, even though we are home owners in an affected area, we have not received any contact from the City regarding the RIP's impacts to our property and to our neighbor's properties.</p> <p>The absence of that contact, along with what we are able to discern from what is available in news publications, suggest this project is motivated by the political draw of forcing affordable housing into existing Portland neighborhoods, when in fact the affordable housing concern is a regional concern.</p> <p>As property owners, we are left to believe our property will be devalued through this re-zoning and any attempts at minimal remodel to our home will be subject to unreasonable demands placed on the property through RIP's new zoning regulations.</p> <p>We consider that unacceptable.</p> <p>The new approach to measuring height from the lowest point of a structure is ill-advised from the standpoint of design continuity. Most of the west side of the river is built on hilly terrain. The majority of houses are placed on streets that traverse (not follow) the slope of these hills. Consider a house on the lower side of the street, and one across the street on the upper side; the new height requirements would limit the street frontage height of the former while permitting the maximum height at the street frontage on the latter. The lower house will have a much shorter facade than the upper house, creating the ridiculous juxtaposition in scale that many residents have complained about for years (McMansions across from smaller established dwellings).</p> <p>The notion that our property and that of our neighbors is best suited to a condominium-style arrangement of multiple dwellings rather than an adequate single-family property is ludicrous and will diminish property values for us. Our property is still our property. The</p>

	<p>social engineering embedded in the RIP is offensive and well-outside the limits of appropriate planning regulations.</p> <p>We object to the apparent avoidance of appropriate infrastructure, including utilities, streets and on- and off-street parking, that would be necessitated by the increased density foisted upon our neighborhood.</p> <p>We object to the one-size-fits-all approach that is half-baked and does not seem to allow for alternatives to achieve the goals that appear to guide the RIP.</p> <p>We seriously question the ability of the RIP to ensure housing affordability and will likely only foster increased demolition and investor ownership, further eroding the character of this neighborhood.</p> <p>Thank you.</p> <p>SW Troy Street, Portland, OR 97219</p> <p>[signed by two individuals]</p>
11/29	<p>Like many Portland residents, I am concerned about the lack of affordable housing. So my knee-jerk reaction was to support the Residential Infill Project that has been proposed. But after studying the matter, I must say that RIP is a bad idea, and for many reasons. Those were articulated well by Christine Yun, and I hope you have read them and take them to heart.</p> <p>It is hard to say whether this plan was developed by a developer intent on firing up the bulldozers, or a misguided good-faith effort from someone, or both, but regardless of motivation, the plan is a bad one.</p> <p>Vote no on RIP, and then start looking for solutions that have been tested and proved true, and which will not destroy the character of the neighborhoods that people want to live in.</p> <p>NE 9th Av., Portland 97212</p>
11/29	<p>I would like to comment on the proposed RIP. I wish to endorse the recommendations of Portland For Everyone, <a href="https://portlandforeveryone.org/">https://portlandforeveryone.org/</a> .</p> <p>I have lived in inner SE Portland for over 50 years, and I am a home owner in the Hosford Abernethy neighborhood. Although I regret the loss of some of the architectural character of Old Portland, the loss of economic, ethnic, and age diversity is far more important. We need more housing in the inner city, and lots of it, in order to combat the rising cost of housing and the gentrification in the inner city. I do not believe that subsidizing "affordable" housing is effective, because it is too expensive and we simply can not afford to subsidize enough housing to make a difference. We have to rely on the market forces of supply and demand; that is, we have to increase the supply of housing.</p> <p>Walking around in neighborhoods such as Buckman and Sunnyside, you can see pretty good housing density. The great majority of housing units are in multi-family structures. Many of them were originally single detached houses, but were retro-fitted to multiple units years</p>

	<p>ago. There are also quite a few courtyard apartments. I would like to see this kind of zoning restored in the entire city.</p> <p>SE 21st Ave., Portland, 97214</p>
<p>11/29</p>	<p>Morgan Tracy and Residential Infill Projects Staff:</p> <p>Attached are my comments on the RIP Discussion Draft of October 2017. Thank you.</p> <p>SE 35th Pl., Portland, OR 97214</p> <p>[From attachment:]</p> <p>Comments on Residential Infill Project Discussion Draft, October 2017</p> <p>Morgan Tracy and RIP Staff:</p> <p>The Residential Infill Project is sorely needed, and will be a small step toward mitigating the housing crisis in Portland. Our city’s increased popularity and the resulting growth, added to the natural increase has created this crisis. The city’s inability to respond with more housing is in large part a result of Portland’s “exclusionary zoning”, that denies many people the opportunity to live in those areas of the city where jobs, services and shopping are available by a short walk, or by convenient transit. A disconcertingly high percentage of the city that is zoned for detached, single-dwelling houses only. Usable zones are limited in mapping, as well as limited in entitlements in Multifamily zones. I support the relatively modest steps toward mitigating these crises that the Discussion Draft includes, and would go further in some cases.</p> <p>Scale of Houses</p> <p>I am concerned about regulations that reduce house size, while encouraging more units within the house. These seem to work at cross-purposes. I would suggest an FAR that increases with the number of units within the main building. For instance, keep the 0.5:1 FAR with no additional units, increase to 0.7:1 FAR if there’s one additional unit in the house, 0.9:1 FAR if there are two additional units, etc, with an additional 0.2:1 for each detached ADU.</p> <p>I oppose the increase in the minimum setback from 10’ to 15’. This is not an “improvement”, it is a denial of urban scale and pedestrian-friendly streetscapes, will reduce the flexibility in siting the house, ADU, and in saving or planting trees on the lot. The provision to allow matching adjacent houses is a help, but only will benefit a few. I agree with the Urban Forestry Commission and the Portland Small Developers Alliance, that the minimum should be 10’ or less, regardless of where adjacent houses are sited.</p> <p>The decision to push houses further back on the lot, increasing the front setback from 10’ to 15’, seems to be motivated by pushback from one SW neighborhood. Yet this regulation will reduce not only back yard space for recreation and for large trees, but makes it more difficult to site a detached ADU. There is no Comp Plan nexus with a regulation whose goal</p>

is to achieve “open, visually pleasing front yards”. Many people find large, “suburban” front lawns (a vestige of English manor houses flaunting their land wealth) boring, environmentally damaging, and an impediment to a friendly, welcoming neighborhood, where walkers converse with porch-sitters. The minimum setback of 10’ should be kept, (or indeed, reduced to 5’), to allow more “urban” single-dwelling houses, like found in many older US cities.

1908 house at [redacted] NE Tillamook, with 3’ front setback:



### Housing Opportunity

All of the housing types available in the Housing Opportunity Overlay Zone will help the housing crisis: Allowing 2 ADUs per house, allowing duplexes, allowing duplexes with an attached ADU, and allowing triplexes on corner lots. I support all of these. Requirements for “visitability” help address our aging population, and those with disabilities. I suggest that the entry requirement be “flush”, rather than one-step, which really doesn’t accomplish the desired effect. The provision for an additional unit if all units are affordable at 80% MFI is a small step toward affordability, but to require all units to be affordable may not pencil out. I suggest that an additional unit be allowed if only one of the units is affordable at 80% MFI.

I support extending the benefits of the Housing Opportunity Overlay to all single-dwelling lots in the city. It is unclear why allowing additional housing types in low-income areas will bring harm, either by gentrification or by displacement.

The Cottage Cluster regulations need to be reworked to encourage true “cottage cluster” developments. A density bonus should be allowed if smaller houses are built. Craft regulations that allow these by right, rather than requiring a Planned Development Review. Allow subdivision so that houses can be sold fee-simple.

### Narrow Lots

I applaud the additional refinement of the Narrow Lot regulations. I support rezoning those R-5 areas platted with 2500 s.f lots to R-2.5, especially those in high-opportunity areas that

have been selected by staff. I support the “attached” requirement for narrower lots, which results in more efficient use of space, and energy in these areas nearest Centers and Corridors. I support eliminating parking requirements on narrow lots (see below).  
Additional suggestions

I support removing all parking requirements in Single-dwelling zones. The areas within 500’ of Centers and Corridors, where the most on-street demand is, are already exempt from on-site parking. Removing the remaining parking requirements will help affordability, and allow better use of high-opportunity areas. Indeed, it may bring opportunity, opportunity for more housing, and opportunity for homeowners to bring in extra income with ADUs.

The regulations in 33.205.030, requiring a house and it’s one to three ADUs together, to only accommodate one “household” is a remnant of antiquated, even classist, restrictions from the 1940s, and should be eliminated. Each dwelling unit contains a “household”, and limiting the number of people in a “household” is difficult to justify as long as life safety codes are met. It is not appropriate for the zoning code to limit the number of people in a house, if the code already does not limit the number of “related” people.

Similarly, the materials and trim requirements for rowhouses and ADUs seem to be a remnant of an attempt to please neighborhood groups, since similar “neighborhood character” requirements are not in place for single-dwelling houses on 5000 s.f. lots. Why are vertically-oriented painted metal panels prohibited? Or board-formed concrete surfaces? Is sprayed stucco more beautiful? There should be no more materials or trim requirements for smaller houses than there are for larger ones.

The Cottage Cluster allowances should be structured to allow more units in such “Clusters” than would be allowed in the base zone. These developments foster community and are a better fit for ageing populations, and should allow more, but smaller, houses. As on single lots, each house in a Cottage Cluster should be allowed an ADU.

Comments by Code section (some mentioned above, others only here):

33.110.205 Housing Types Required (p 19):

I support requiring a minimum of two units when a R-2.5 lot that is 5000 s.f. develops, to ensure these valuable sites are not underutilized. I disagree with allowing the requirement to be met with an ADU, which can just turn into an office for the house owners. We’ve already seen that happen with minimum density requirements in R-1 (28<sup>th</sup> and Belmont, e.g.). The city should require two rowhouses or a duplex. Perhaps this could be implemented with a requirement that the smaller of the two units be no less than 80% the size of the other unit.

Table 110-3 as well as section 33.110.215 Floor Area Ratios (p 25)

I support the FAR concept, but think the allowances are too low, especially in light of the desire to include an ADU within the main house. The R-5 FAR should be at least 0.5:1, but increase by an additional 0.2:1 FAR for each unit within the main house. Increase the

allowance for each detached ADU to 0.2:1. The R-2.5 zone FAR should likewise increase for each additional unit within the main house.

Table 110-3 as well as 33.110.220 Height (p. 25, 27)

I support keeping the R-5 heights at 30', with modified measuring protocols, and keeping the R-2.5 height at 35', unless detached houses are built. I support the modified dormer regulations. The R-2.5 35' heights provide a transition to the 45' height limit in the Mixed Use zones that often abut R-2.5 zoning.

Table 110-3 as well as 33.110.225 Setbacks (pp 25, 31-33)

As noted, I oppose the increase in minimum front setbacks in R-5 and R-2.5 from 10' to 15'. The suburban "pleasing front yards" rationale is a construct from the 1950s that has no place in a world where reducing Greenhouse Gas emissions and providing affordable housing depends on maximizing the use of close-in, walkable and transit-friendly neighborhoods. The setback should in fact be reduced to 5' or zero, not increased. The "compromise" allowing a house to "match" an abutting house is inequitable, as it depends on what happens to be on adjoining lots. If reduced setbacks are valued, in order to improve urban form (instead of "suburban" form), and to allow for larger back yards for ADUs and/or tree planting, then they should be allowed everywhere, not grudgingly allowed only where adjacent houses have small setbacks.

33.110.240.C. Street-facing Facades, Windows (p 47)

While no changes are proposed here, I propose a change. There is a trend toward constructing "screens" or other constructions in front of windows, both on single-dwelling and multi-dwelling residences. This is probably for privacy, but also seems to be a modern "look". However, in order to accomplish the purpose of this standard, these, as well as glass block, should be called out specifically as not meeting the standard, of allowing views from the window to the street. Looking out through a "screen" limits building occupants' views of people walking on the street, and also removes the feeling of safety for walkers, that is provided by the "eyes on the street" that visible windows provide.

House at N.Vancouver and Beech with recently added slats covering the windows:



I suggest this language be added: “No structural or decorative elements that are not part of the window, can be placed in front of windows that count toward meeting this standard. Prohibited elements include grids, louvers, slats or fins placed in front of the exterior of the window.”

33.110.240 E. Exterior Stairs (pp 46-49)

While I agree with the desire to limit first floors that are high above grade, I think the standard of 6 above-grade stairs is too rigid. There are many examples of older houses (that have not been raised), with 7, 8, or even 9 steps up to the front porch. These houses would become non-conforming with the proposed standard:

This 1894 house (left) at 2116 SE Ankeny has 8 steps (one of several 8-step porches spotted in a 2-block search). But the scale and height of the porch renders these steps appropriate. The 1886 house (right) at 446 NE Tillamook, has 9 steps, but that seems to be an outlier.



I suggest the standard be changed to 8 steps maximum.

33.110.250 C. 4. a. and c. Detached Accessory Structures Additional Standards (p 55),

33.110.260 C. 5. Narrow Lots Exterior Finish Materials (p 73) and 33.110.265.C.2.e.(1) Flag Lots Exterior Finish Materials (p 77)

All of these standards limit materials and finishes on ADUs, and on skinny houses, in a way that the primary house, or a house on a 5,000 s.f. lot, are not similarly limited. These “traditional” materials seem to be an attempt to match a certain era (1910-1930?) of house that is assumed to be the predominant type in single-dwelling zones. This is by no means a certainty. These dwelling types will also be allowed in 1950s and 1980s neighborhoods. To try to limit materials in an attempt to garner political acceptance, the regulations in these sections make these smaller houses seem like a silly throwback from the unrestricted styles that can be built on other lots. They should be eliminated. Eaves may serve a resiliency purpose, but the ban on steel siding products and other innovations is not warranted. The materials listed seem purely an aesthetic choice, which has no place in these regulations. Here’s a couple of examples of contemporary treatments that for unsupportable reasons, would not be allowed on smaller houses:

Remodeled house with metal siding, and house with composite panels and no corner trim:



33.205.030.A. Number of Residents (p 109)

As noted, this entire section should be deleted. As long as building codes are followed, the city should not be in the business of otherwise limiting occupancy, a concept based on historical practices which were, at the least, classist and at worst, racist and exclusionary. Do you really want to limit the 4 units on a lot to a maximum of 6 occupants?  
See: <http://www.sightline.org/2013/01/16/servants-welcome-roommates-barred/>

33.266.120 Parking, Development Standards for Houses, Duplexes and Triplexes

As noted, I believe all remaining parking requirements for single-dwelling zones should be eliminated, as they are not needed in the areas more than 500’ from frequent transit, and parking is already not required for closer sites.

33.405 Additional Housing Opportunity Overlay Zone (pp 125-146)

I support this proposal. As noted, I would also support applying these regulations to all single-dwelling sites within the city.

33.610.200.D. 2. C. Lots in R-5 Zone, Dimensions (p 151)

I support the requirement in that if a lot abuts an alley, any parking provided be accessed on that alley. I encourage, though, a new look at the paving standards, that would allow gravel alleys, so this requirement is not as burdensome as hard paving requirements, which would be an issue especially for low-income housing providers. Also, a specification of amount of grade on the lot, or between the alley and the lot, could trigger an exemption, without need for an adjustment.

33.611.200.C.3 Lots in R-2.5 Zone, Dimensions (p 155)

I would suggest the minimum 25' lot width be reduced to 22', so that the common 45' (and also 44') lot widths in many older subdivisions will allow for lot splits, for attached rowhouses to be built.

Below, Rowhouses at 1515 and 1523 SE 35<sup>th</sup> Place, built on a 46.7' wide lot (in this case, using the "transitional lot" provisions):



Conclusion

I thank BPS staff and all who have contributed for the well-thought-out concepts included in this proposal, and hope these minor tweaks can be incorporated in the Proposed Draft.

Thank you.

11/29

Agree, there is a need for affordable housing.

Yes, there are smart, equitable, and efficient methods to satisfy the need. The current process does not satisfy those descriptors. Rather than forcing changes on citizens in a ham fisted way, develop incentives that are appealing to property owners and move them willingly in the direction of change you desire.

This current RIP proposal eerily recalls the well documented, much abused, Air BnB process developed and mismanaged by the same staff and Project Managers, Morgan Tracy and Julia Gisler. The proposal lacks well thought out protections/regulations and has reckless disregard for values of single family neighborhoods which have long been cherished by the City and its citizens.

The current project draft fails to abide by amendments communicated by Portland City Council at the December 7th 2016 City Council meeting. This is an unconscionable deviation from documented Council intent. The lack of professionalism exhibited by the staff is appalling.

The current process may have already missed the optimal window for implementation, as the needs of the populace are changing to 2 and 3 bedroom homes, not studios and one bedroom ADU's.

- Portland Tribune 9/5/17 article by Jules Rogers
- NPR All Things Considered 9/15/17  
<https://www.npr.org/2017/09/15/551232392/as-millennials-get-older-many-are-buying-suvs-to-drive-to-their-suburban-homes>
- Portland Tibune 9/22/17 article by Jim Redden

Here are some suggestions to deliver a more equitable and acceptable project:

Create and adopt a policy that defines, and limits, the percentage of lots on each city block that can be developed in this manner. This would help maintain the long cherished, by city planners and property owners, characteristics and integrity of existing single family neighborhoods. This will affect a compromise option in the space between no infill and the systematic transformation of single family neighborhoods into motel zones.

Develop an effective protection system to monitor and manage compliance with the policy while also providing checks on potential abuses.

- Create a standard rental contract to be utilized in all rental agreements for all properties associated with the project
- contract will be updated annually with the current Median Family Income numbers
- contract will be available on-line at the portlandoregon.gov website and at public facilities: libraries, post offices... Responsibility of the City to ensure available hard copies are current
- create a "Hotline" phone number, listed on all contract forms, for prospective renters to call if the proposed rental fee is above the current Median Family Income; or if there are other discrepancies with the program requirements.
- Require the property owner listed on the property deed to be the principal resident in one of the units on the property for a minimum duration of six months plus one day each year

- Impose significant, escalating monthly penalties for non compliance with final action being seizure of the property and sending it to auction
- the property owner must be an actual person, not a legal entity i.e. trust, LLC etc..

Provide independent engineering analysis to ensure that existing utility infrastructure (sewer, water, power, gas, communications) has the necessary extra capacity to maintain existing service quality and to absorb the additional demand imposed by the new development. Failure to perform this analysis, and act appropriately as the results dictate, will be an unconscionable dereliction of duty to act prudently and responsibly and will result in enormous future costs to correct the insufficiencies by upgrading the various systems. Ultimately the ratepayers/citizens will bear these costs.

- Develop a fee associated with these RIP developments to capture the proportional cost of infrastructure upgrades necessitated by this development.

Mitigate the egregious over reach exhibited by planners when turning virtually every area of the city that has a commercial identity of any magnitude into a “center” for the sake of maximizing the “a” overlay. “Centers” within the city have been defined on maps for years and were configured within a rational paradigm. The recent expansion of “centers” without public input and process is outrageous and must be reversed.

Adopt a realistic “a” overlay zone associated with transit “Frequent Service” routes as defined on the TriMet website <https://trimet.org/schedules/frequent-service.htm> ; and associated with areas that actually provide “amenities”. Applying the overlay to non “Frequent Service” lines and to areas that do not provide “amenities” is unfair to new and existing residential properties and just plain lazy and unprofessional, a matter of convenience for planners.

Instead of rezoning historically platted narrow lots to R2.5 develop a menu of incentives for the property owners to rezone these lots when they are sold. It should be easy as a lot that can have two dwellings built on the same area that previously had one dwelling should be more valuable to the seller when a sale is made. Put this process in the hands of the existing property owners and not in the hands of developers. As proposed earlier in this document limit the number of lots on a block that can be developed in this manner.

Step back and review all aspects of the current draft proposal. Identify the parts that are professionally developed, fair and equitable, appeal to a willing audience for change, and return a draft that is worthy of a meaningful cooperative collaboration with the citizens of the city.

11/29

I support those provisions of the Residential Infill Project (RIP) that retain the character of the existing neighborhoods. Reducing the scale of new housing, measuring building heights from the lowest point of the lot, and averaging setbacks will allow infill to blend into the neighborhoods. These provisions will assure that Portland grows in a way that protects the great place that it is today.

I oppose the RIP's A overlay that will affect 85,000 properties in the City. It adds capacity that is not needed. The Draft 2035 Comprehensive Plan clearly states that there is more than

	<p>enough capacity under the current zoning for the growth that is projected through 2035. There is no need to add additional capacity for 85,000 units of unaffordable housing or 170,000 units of affordable housing. The RIP's A overlay adds these capacities by increasing the number of housing units allowed in the base zones. It will turn single-family zones into multifamily zones. I do not accept the flawed concept of the A overlay.</p> <p>If additional capacity is needed, then I support land-use planning best practices that require that base zones be changed in the Comprehensive Plan with community input. This approach would be consistent with Oregon's Land Use Goals. I urge you to remove the A overlay from the RIP. Please add this to the record.</p> <p>Thank you,</p> <p>Portland, Oregon 97219</p>
11/29	<p>See below my comments on the proposed residential infill zoning amendments.</p> <p>Create separate proposals</p> <p>The RIP proposal includes three very different proposals: Scale of Houses, Housing Opportunity, and Narrow Lots. Each of these topics would be complex enough on its own, but when amalgamated into a single proposal it becomes overly complicated and confusing. Please move each of these components into its own proposal, which could be discussed independently from the others.</p> <p>Scale of new houses</p> <p>Most would agree that the existing zoning code permits structures that are too large for their context in the R2.5 and R5 zones. These larger structures don't fit well with their neighbors, and tend to be overly expensive and unaffordable.</p> <ul style="list-style-type: none"> <li>• The proposals for reducing housing size are a good start, but do not go far enough. Though the proposal represents a significant reduction from what is theoretically buildable now, the proposed structure sizes are still much larger than almost any of the existing housing stock in my neighborhood. Please further limit structure size, perhaps by including basements and attics in calculations of a house's square footage if they are less than 2ft above ground, or are are tall enough for dormers to be added to create a usable living space respectively. Limiting FAR to 0.5 would be more appropriate for a single-family zone.</li> <li>• I like the increased uniformity of setbacks you have proposed, and would like to see a similar approach applied to height, perhaps limiting houses to a height of their tallest neighbor plus 5 feet.</li> </ul> <p>Housing Opportunity Overlay</p> <p>I am deeply concerned that making such sweeping changes to the zoning code, without any site-specific context, will have many unintended consequences. Portland just went through a major process to update the Comprehensive Plan, taking into account factors such as</p>

infrastructure, walkability, and livability; many of the proposals in this section are far more blunt, and in many cases undermine or counteract that recent, more nuanced work. Further, many of these proposals will encourage increased demolitions, leading to an accelerated loss of affordable housing and historic structures. Finally, while the proposals may increase the supply of (upper end) rental property, they will do little to increase ownership opportunities in the city.

- The Housing Opportunity proposals fundamentally redefine what it means to live in a single-family zone. If that is your intent, please simply change the meaning of the underlying zones rather than rely on the overlay mechanism, and extend the provisions citywide.
- Where triplexes are permitted on corners, please ensure that at least one entrance is facing each street. This is likely what was intended, but the proposed code language does not require this.
- Allowing internal conversions of larger single-family houses to duplexes or even triplexes is a good way to add density and create more housing opportunities while avoiding many of the negative issues associated with new construction. Require that the street-facing facade remains intact when a structure is internally converted, and ensure we have a clearer definition "demolition" and "major remodel" to ensure internal conversions don't lead to de facto demolitions.
- Disqualify projects involving the demolition of "viable" structures from eligibility for any of the overlay bonuses, allowing bonus units only when existing structures are preserved.
- Rewrite provisions for mid-block duplexes and corner triplexes (or 4-plexes with a bonus) to mimic the current corner duplex code, which allows each unit its own lot, and allows units to be owned separately.

#### Narrow lots

Narrow lots are a historical anomaly, and were never meant to be built as such. Using them as a basis for zoning decisions today is misguided.

- Allowing narrow lot subdivision in R5 zones would directly contradict work done for the Comprehensive Plan. Where it made sense, R5 has already been converted to R2.5.
- In most locations and contexts, narrow lots do not support the architectural character of Portland.
- Where narrow lots currently exist, I support the proposal to require adjacent houses to be attached, as well as an elimination of the parking requirement. This will increase the livability of the units, and will improve their exterior appearance.

## Affordability

What is missing from this proposal is any focus on our disappearing stock of affordable housing. To the extent that the Housing Opportunity ideas work, they will accelerate the demolition and redevelopment of our most affordable housing structures, replacing them with significantly less affordable units. This pattern has been playing out in my neighborhood, and is being repeated around the city. Demolitions destroy affordability.

To reduce the incentives for further losses of affordable housing, please consider the following:

- Additional limitations on the size of housing (as outlined above) are probably the single most effective way to limit the cost of new housing. Smaller houses are inherently less expensive than larger houses. While smaller structures are not a panacea for our housing crisis, they can help more slow the growth in housing prices more than anything else in this proposal.
- Reduce or eliminate subsidies for ADUs that are not used for affordable housing. Do not continue to waive SDCs for projects that do not commit to dedicating units for long term rental housing at affordable prices.
- Introduce further limitations on using ADUs as short-term rentals, thereby encouraging them to be rented to long-term tenants. Encouraging the development of more ADUs does not help with affordability if the units are not available to those that need them.
- Where a bonus unit is awarded on grounds of affordability, please lower the definition of "affordable" from 80% MFI to 60% MFI to allow these units to benefit those who are having the most difficulty in the current market.

## Conflict of interest

Allowing members of the RIP committee that stand to profit directly or indirectly from the proposals they are recommending undermines trust in the process. Given the committee's recommendations have the potential to make a huge impact on neighborhood character, affordability, and livability across the city, trust and confidence in the independence of those developing the proposals is essential. In most places, such conflicts of interest would punishable offenses.

There are some good elements in this plan, but overall I am concerned that it will set into motion a process that will increase the cost of housing while damaging the fabric of the neighborhoods that make Portland such a special place. I am confident we can do better.

Yours sincerely,

SE Tibbetts, Portland

11/29	<p>The HOOZ RIP proposal builds on failed policies.</p> <p>The “a” overlay has been around since 1996. This allows developers to add additional density on 45,000 SFR lots in Portland, today. This overlay exists in Sellwood, King, Kenton, Boise, Sabin, Concordia, Montavilla, Woodstock, and many neighborhoods east of 205. Since 1996 only 212 out of 45,000 lots have produced that additional unit. That’s only .4%. (POINT 4%)</p> <p>Duplexes on every corner? Has produced, according to BPS, only 3.5 to 5% of possible duplexes.</p> <p>These “incentives” have not resulted in the hoped for result. Why? Developers want to build single family houses. That’s where the largest profit lies. Why cover 85% of the SF areas and convert them to multi-family as proposed here? BPS hopes that developers will build what we need, not what sells.</p> <p>You can’t build you way out of a housing affordability problem.</p> <p>This year over 600 permits for new houses have been issued. Last 2 years, 700 each. In 2010, only 300. So let’s assume this building boom will continue forever.</p> <p>700 units a year, approximately 350 demolitions, so a net increase of 350 new houses a year. Push that forward 20 years and you get 7,000 new households. Assume they will all be duplexes and there’s 14,000. Still short of the 24,000. And we know that developers will not simply build all duplexes. And they will not be affordable.</p> <p>Costs- RIP is for the rich.</p> <p>Analysis of a hypothetical 9 unit cluster development on SE 92nd- land, permits, construction, profit, sales, etc. will yield a 1,250 square foot home for \$381,000. This is affordable to a household income of \$75,000.</p> <p>Let’s look at those house diagrams in the RIP booklet. All of these cost examples assume a land cost of \$350k with demolition of an existing house.</p> <p>First, a 2500 sf duplex would need to sell for \$833,000. So half would be \$415,000. Affordable to families making \$85,000 plus.</p> <p>A 2500 sf house with a 750 square foot ADU in back would be \$942,000.</p> <p>A 2500 SF duplex with detached ADU would be \$976,000.</p> <p>A 2500 square foot house with 1250 sf basement and detached ADU would be \$1,118,000</p>
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	<p>Who can afford these?</p> <p>ADU's</p> <p>The ADU boom is also contributing to increased density. 2,813 ADU's since 2000 have been permitted. In the last 3 of those years, 1,316 have been permitted or an average of 450 per year. Assuming this blistering pace continues, ADU's will add 9000 additional units in 20 years. This amazing growth has happened since SDC's have been eliminated for ADU permits. That expires in June of 2018. Will it continue? If it expires, it will add approx. \$15,000 to the cost of the average ADU which is currently \$160-200,000. Rentals range from \$1100 to \$2000 per month. Not affordable.</p> <p>Real Estate Taxes</p> <p>Nowhere does the RIP proposal discuss the real estate tax implication of re-zoning vast areas of Portland multi-family. We can only look at the recent debacle of the ADU taxation.</p> <p>My recommendations: Proceed with a "test" HOOZ zone of 1/10 of a mile at centers and corridors. Look at this area to be rezoned R-1 to truly provide middle housing where it belongs. Transit oriented development. Not scattershot densification proposed by RIP.</p> <p>Utilize the \$60-80 million BDS "slush fund" to significantly reduce permit costs for those projects that fall within the affordability spectrum. Do the same for residences that are remodeled and expanded instead of demolished.</p> <p>Continue the SDC waiver for ADU's.</p> <p>Revise the building code to allow 4 unit buildings to be constructed under the residential code.</p>
11/29	<p>To whom it may concern:</p> <p>I have attended your "informational" meetings on the new RIP A overlay and I am appalled by the lack of consideration the city has given to long-term residence in the area. While my property taxes increase with every new bond measure my property value decreases with the RIP plan and people living in RVs in neighbor's driveways! I spoke to a project representative and asked how the city planned to address parking on our narrow neighborhoods streets and I was told it was not the city's concern. It's just going to be the wild wild west of parking out here. I have already been woken up early in the morning by garbage trucks honking their horns because somebody parked on the narrow street in front of my house and they couldn't get through. To add insult to injury - I live on a street that is not maintained by the city. As neighbors, we all pitch in to maintain this street but as the increase of capacity continues, the cost of the street maintenance goes up with NO ADDITIONAL FUNDS from people now using the street and certainly nothing from the city. It's a gravel street so the increased traffic increases the dust and debris all over our homes. Cramming more people</p>

	<p>into a well-established small neighborhood just breeds resentment, transitive tenants and property decline.</p> <p>I oppose the RIP's A overlay that will affect 85,000 properties in the City. It adds capacity that is not needed. The Draft 2035 Comprehensive Plan clearly states that there is more than enough capacity under the current zoning for the growth that is projected through 2035. There is no need to add additional capacity for 85,000 units of unaffordable housing or 170,000 units of affordable housing. The RIP's A overlay adds these capacities by increasing the number of housing units allowed in the base zones. It will turn single-family zones into multifamily zones. I do not accept the flawed concept of the A overlay.</p>
11/29	<p>Thank you for the opportunity for input. Please address the questions and comments below</p> <p>While increased density is great in many ways, it cannot be done without consideration for 1: the existing neighborhood plans (Buckman's plan is Oregon Law), 2: Without the understanding of limits to growth 3: Impacts to the infrastructure schools, healthcare.</p> <ol style="list-style-type: none"> <li>1. Does the current City Plan for inner SE comply with the Buckman plan of increasing density on major streets and preserving the character of the community?</li> <li>2. Limits to growth are real. Particularly given the proximity to the Willamette River.       <ol style="list-style-type: none"> <li>A. Can the existing sewage treatment facility even handle the maximum capacity necessary for this density? If not, what are the plans for its expansion and when will that happen?</li> <li>B. Has this increase in density been considered in the Willamette River Basin Review Feasibility Study? If so how?</li> <li>C. Can the sources for Portland Water handle the increase development and growth projections? If so how? How does this effect the growth of Portland? What is the maximum number of people the Bull Run water source can support? Has the swing in extreme weather conditions effected the quantity of ground water and quality?</li> <li>D. Can the existing power grid supply the power need to support the increase in growth? What are the inherent limits and how with the City plan to increase, in a timely fashion the necessary infrastructure to support increased demands tied to the growth?</li> </ol> </li> <li>3. Impacts to infrastructure       <ol style="list-style-type: none"> <li>A. How will the city respond to the limited infrastructure in place to deal with an earthquake given the already overcrowded roads and the increase in density in the city center in river bed land fill?</li> <li>B. Given the limited tax bases for Schools, the waving of development taxes the City has already done, how will the necessary public schools be funded?</li> </ol> </li> </ol>

	<p>C. Increase density means the increase of infectious diseases as population increases. Can the medical infrastructure deal with this increase? Has it been studied?</p> <p>D. The city's current model for development has not relieved the housing crises- new housing on the market is not affordable to most Portland residents? How will this change with the new development?</p> <p>E. Given the global crises with the environment and the rising sea levels, why would the city encourage development next to the river? What effects to the Willamette River and its flood plain will happen when the sea level raises 4 inches?</p> <p>4. The changes to inner SE Portland (Buckman industrial zone) will force many small businesses out of Portland. Has this impact been considered. As a business owner in SE industrial area (10 and Hawthorne) will be forced out of the one story building I'm in and move over \$3 million dollars of business out of Portland. I am only one business owner and support 12 families.</p>
11/29	<p>Residential Infill Project staff,</p> <p>I am writing to express support for the residential infill project.</p> <p>I genuinely appreciate the overall goals of the project and the mechanisms proposed to meet those objectives. Improving the residential codes to be more flexible in terms of housing types is essential as the city grows into being the center of an increasingly major metropolitan region.</p> <p>In particular, I strongly support the allowance of two ADUs on residential properties! Thanks for including this important design concept in the project.</p> <p>The two areas that I believe require more staff attention are the following:</p> <ol style="list-style-type: none"> <li>1) The housing opportunity overlay zone should be applied to all over Portland's residential zones, and not exclude certain districts based on their lack of transit access or other services. I fear that the City hasn't considered how the current proposed boundaries may adversely impact the districts that are excluded from the proposal. If it's truly an opportunity zone, and I believe it is, then the City should provide that opportunity to areas that don't have as much opportunity. Either it's an opportunity, or it's not. If it is, then that opportunity should be provided equitably.</li> </ol> <p>The optics of the excluding portions of east Portland do not look good, even if the rationale for the exclusions were well-intentioned.</p> <p>Do the less wealthy neighborhood residents in east Portland actually explicitly want to be excluded from RIP? For that matter, do any residents (besides City staff) concur</p>

	<p>that these specific areas should be excluded? I have not heard the public clamoring for these geographic boundaries for the overlay zone.</p> <p>Who (besides City staff) have expressed that they want particular districts in east Portland and St. Johns to be excluded from the overlay zone?</p> <p>While I know that there has been a displacement analysis, I think that the City is somehow really off target on this matter. I encourage the City to broaden the A-overlay to all residential areas with some legal exclusions where necessary (eg. historic overlay zones).</p> <p>2) The FAR standards need to be tweaked to foster more accessory units. I suspect that would be a better if the FAR increased for the attached ADU and slightly for the detached ADU as well. Also, the FARs may need some adjusting for duplexes and triplexes.</p> <p>Since the City wants is aiming to foster more small housing units, it would make sense to involve developers to ascertain what FAR standards would foster more additional units.</p> <p>As it stands, I sense that the FAR limits do not seem to sufficiently foster a second ADU or duplexes and triplexes. But, since this is new, it's hard to know this without talking to the actual developers who would be dealing with this code professionally.</p> <p>Would they be more inclined to build a single family house in a standard 5,000 sq ft lot? Or, would they be more inclined to build three units on a standard 5,000 sq ft lot? And what factors would come into play for them to make those decisions?</p> <p>The City should ensure that the regulations are designed in such a way that most small-scale developers are inclined towards the latter. If so, that's great. If not, then the RIP will not accomplish its goals.</p> <p>Those and some other minor code tweaking aside, thank you for putting together a fantastic proposal. I hope that it comes to fruition, as regardless of the aforementioned details, it certainly steers Portland in the right direction to create more inclusive housing options.</p> <p>3) One other suggestion regarding internal conversions: Increase the size of basement ADU conversions to allow any size up to full size of the basement level by right. Limiting them to 800 sq ft does not make sense when many basements exceed 800 sq ft. This is something Portland should have done years ago and it should be updated in this code.</p>
11/29	<p>Comments on the draft Residential Infill Project plan Nov 30, 2017</p> <p>In brief, what I like, overall:</p>

- Adding to the housing stock using “middle housing”.
- Reducing the scale of housing.
- Spreading out the middle housing throughout most of the city.

In brief, my concerns:

- Limit on type of “middle housing” in the Overlay area.
- Insufficient incentive - or requirements - for affordable housing.
- Subtraction zones should be limited Overlay some elements rather than complete subtraction [see below].
- No real solutions to displacement.
- Parking issues appear to have not been sufficiently considered.

Detailed comments:

## 2. Housing opportunity

- A. As I grew up in a city with lots of “middle housing” I am very comfortable with this concept. However, I do not understand the “intensity” distinctions in this statement, with the exception, perhaps of “live-work” units:

Page 5: “A paradigm shift towards more “middle” housing

Middle housing is a term used to describe housing forms that are compatible in scale with single-dwelling areas but accommodate more units. These housing types range from duplexes and triplexes on the low-intensity end to bungalow courts in the middle of the spectrum and live-work units and courtyard apartments on the higher-intensity end. This project focuses on the low-intensity end of the “middle” housing spectrum....

In my opinion, “bungalow courts” and “courtyard apartments” should be encouraged as well. In my experience, these types of apartments are often single-story [although they don’t have to be]. They are often more attractive than duplex or triplex buildings, which tend to be multiple story. I feel the height actually allows them to fit into single home neighborhoods better. Also, in my vision they presume some sort of courtyard, which provides a more attractive look than the duplex or triplex buildings I envision. They should be created as both homeownership and rental opportunities.

	<p>B. RIP says, “A duplex or triplex could better offer this opportunity at a price that is more affordable than that of a single-family home.” This appears to be a statement without substantiation. One would like to think this would be true but on what basis can we say it will be? This brings me to my main issue:</p> <p>C. My biggest concern is that whereas you say “increasing the amount of affordable housing” is one of the main objectives, there is not much of plan for that, apart from a hope that a larger supply of housing will bring prices down and some minimal “bonuses” for including affordability in the added middle housing.</p> <p>I agree that adding to the housing supply will help. But, that is far from sufficient. Adding a “bonus unit” onto an already increasingly dense lot is not the answer, either. The options for expanding density in the RIP are already generous [possibly a bit too generous]. The city would be going overboard by adding even more. I’m not sure what the solutions are for affordability but they must be sought.</p> <p>D. In terms of the subtraction Overlay, I actually live in one of those areas. The concern about displacement and affordability is appreciated but, at the same time, there should be some options - perhaps more limited - for those living in these areas. I strongly think we should look at the CDCs developing affordable cottage clusters in single home zones, as well as other types of middle housing. Cottage clusters would work for both homeownership and rental.</p> <p>E. ADUs should not become a vehicle for creating an inventory of short-term rentals in neighborhoods. The criteria for allowing ADUs should be strict, in this regard.</p> <p>One last thing, since the estimation over the next twenty years is that only about 5% of available locations will use any of the increased density options, why not limit the Overlay to an area closer to corridors and centers and see how it goes? Evaluate before extending beyond those locations.</p>
11/29	<p>Hi Morgan,</p> <p>Been a while. I hope you are doing well.</p> <p>I would like to submit the attached testimony regarding the Residential Infill Project Discussion Draft.</p> <p>[Attachment content follows:]</p>

November 30, 2017

To: Morgan Tracy and BPS staff

Re: Residential Infill Project – Discussion Draft

Mr. Tracy,

We are writing to request some modifications to the Residential Infill Project Discussion Draft to make the 'alternative housing options' (e.g. corner plexes, mid-block duplexes, cottage clusters) work for a wider range of for-profit and non-profit builders.

These housing types are ideal for first time homebuyers, and the Discussion Draft does a good job of ensuring that they'll fit in well with existing neighborhoods. But they'll only get built if Portland's homebuilders can actually use these provisions. A few changes are in order for this to happen.

As currently proposed, RIP provisions for 'alternative housing' do not support fee simple ownership models. This is a major obstacle, since builders, buyers and lenders all prefer fee simple ownership.

It's true that some builders have reluctantly started using condominium ownership as an end run to Portland's unwieldy and time-consuming subdivision processes. Even so, it's unlikely that for-sale versions of these alternative housing types will get much traction if that's the only option on the table.

Fortunately, code language to provide fee simple options has already been written. Portland's existing 'corner duplex' code allows builders to drop in property lines to create attached homes. This language can readily be adapted to other 'alternative housing' situations, as summarized in the attached document. Such changes should not require any modifications to the subdivision chapters of Title 33.

With cottage clusters, the only option on the table in the Discussion Draft relies on builders being willing and able to navigate both a planned development land use process and condominium ownership. Although this is technically possible and might occasionally happen, we should recognize that nearly most cottage cluster or 'pocket neighborhood' developed elsewhere in the US are legally subdivisions, with lots owned fee simple by residents. To adopt a cottage code that excludes this portion of the broader building community would be quite short-sighted.

Much as we wish the RIP could reform Portland's subdivision process, that's no reason to give up on the notion of allowing small homes on their own small lots. In fact, this is *exactly* the kind of housing we should be supporting to meet the demands of moderate-income homebuyers who have been largely shut out from the current new home market.

### Attached Home Land Division Option

**For corner plexes and mid-block duplexes, allow attached homes (on their own lots) subject to the following lot size constraints:**

- In the R5 – R20 zones, lots must meet the minimum lot dimension standards stated in Chapter 33.611, Lots in the R2.5 Zone.
- In the R2.5 zone, there are no minimum lot dimension standards for the new lots.

*Commentary: This mimics the way corner duplex lots are treated under existing code (33.110.240.E.3.)*

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### Cottage Clusters

**Provide two paths for cottage cluster development:**

**(1) Mix of primary homes and accessory dwelling units through a PD process:**

- Allow an internal and detached ADU in the "a" overlay or a single ADU (internal or detached) outside the "a" overlay.

*Commentary: This mirrors what would be allowed on fee simple lots through a subdivision process and is similar to the current Discussion Draft proposal. It levels the playing field between what would be allowed on subdivided lots and what would be allowed through a planned development.*

- At least 50% of homes must face onto common landscaped open space that includes at least 400 square feet of grassy area, play area, or dedicated gardening space, which must be at least 15 feet wide at its narrowest dimension.

*Commentary: The Discussion Draft proposes this language for all PDs with detached homes. This language makes sense for cottage clusters, but not necessarily for other PDs with detached homes. Dimensional requirements are borrowed from Portland's existing rules for common greens.*

- Cap building coverage at the greater of Table 110-4 or 35% of site area.

*Commentary: Building coverage requirement for single dwelling zones are designed for situations of 1 home per lot, so typically need to be adjusted to work for more than 1 home on a larger lot. Applying a standard building coverage based on lot size to addresses this issue is a common feature of cottage cluster codes (Bend allows 50% for 6,000sf or smaller lots; 35% for 6,000sf+ lots; Grants Pass allows 35% for cottage*

clusters regardless of lot size). Capping building coverage based on the greater of Table 110-4 or 35% of site area uses the existing table to deal with smaller lots (where higher coverage percentages are appropriate) and the 35% cap for larger sites.

- Review through a Type IIX PD process.

*Commentary: Matches Discussion Draft proposal*

**(2) More traditional cottage cluster option:**

- Allow double the base zone density, subject to homes no larger than 1,200sf.

*Commentary: This size cap is large enough for a modest 3-BR home, yet is less than half the size of an average new home in Portland. Using this provision would yield less building mass than would typically get developed in a non-cottage cluster project. Also, 1,200sf was established as a square footage transition point for PBOT SDCs based on an expectation that this would be a natural demarcation point in the RIP.*

- Max height: 25'

*Commentary: Traditionally, cottages fall in scale somewhere between ADUs and single family homes. Detached ADUs are capped at 20' in height; single family homes are capped at 30'. Capping height at 25' is mid-way between, effectively limiting cottages to 2 stories. This is the height limit found in Sister's, Bend's, and Langley's cottage cluster codes.*

- Base code provisions apply for setbacks, property line fencing, FAR, off-street parking. Building coverage capped at greater of Table 110-4 or 35%.

*Commentary: To ensure size, massing and privacy impacts on adjoining properties are no greater than would be allowed by other by-right development, cottage clusters should have to meet these standard base code provisions. Exceptions to standard provisions (such as 0' setbacks to alleys, parking waivers near transit; front yard setbacks where adjoining properties have 10' setbacks...) would also apply to cottage clusters. See prior comment re: building coverage cap.*

- Exempt 1 pre-existing home (built before \_\_\_) per cottage cluster from the 1,200sf size cap and 25' height limit, so long as the entire cluster complies with the FAR limit and other requirements of the zone and of this title.

*Commentary: If an existing home is larger than 1,200sf and/or taller than 25', this should not disqualify the property on which it sits from being used for a cottage cluster development, so long as the home gets preserved.*

- Max. homes per cluster: 16

*Commentary: Some cottage cluster codes cap the number of homes in a cluster (e.g. 12 in White Salmon; 14 in Sisters, OR) and some don't cap the number at all (e.g. Bend). Portland's zoning code already caps the number of homes around a common court at 16. This seems like a reasonable number to use for a cap on homes in a cottage cluster.*

- At least 50% of homes must face onto common landscaped open space (which could be a common green or within a shared court) that includes at least 400 square feet of grassy area, play area, or dedicated gardening space, which must be at least 15 feet wide at its narrowest dimension.

*Commentary: The Discussion Draft proposes this language for all PDs with detached homes. This language makes sense for cottage clusters, but not necessarily other PDs with detached homes. Portland's dimensional requirements for common greens would apply, even in a planned development where no common green is technically created.*

- Accessory dwelling units shall not be permitted in cottage cluster developments

*Commentary: A cottage cluster code is an alternative way of building more, smaller homes on a property. Adding ADUs would effectively 'double dip' on two types of density bonus. Bend's cottage cluster code has an ADU prohibition, presumably based on this same logic. Portland's current corner duplex provision similarly disallows ADUs.*

- Allow cottage clusters to include 1 and/or 2-unit buildings

*Commentary: Integrating duplexes or 2-unit attached townhomes into a cottage cluster development facilitates the creation of more substantial open areas by decreasing the amount of land dedicated to side yards between homes. Neighbors would not be negatively impacted, since the largest possible 2-unit building in a cottage cluster would be 2,400sf and capped at 25' in height, which is less massive and shorter than typical new single family homes allowed by right.*

- A "common house" detached, covered, accessory structures in a cottage clusters containing shared kitchen facilities and guest bedroom(s) would be permitted so long as it falls within overall FAR, height, setback and building coverage limits for the site. Such a building would not count towards the maximum allowed density so long as a covenant is recorded against the property stating that the structure is not a legal dwelling unit and will not be used as a primary dwelling.

*Commentary: Under current regulations, a 'common house' with kitchen and sleeping facilities is treated as a dwelling unit. This means the builder pays SDCs for the structure and it counts against maximum allowed density for the site. These costs significantly decreases the likelihood that such shared amenities will ever get built. An alternative approach is to treat such a structure as a commercial structure. But this has its own complications & added expenses – since building code would treat it*

	<p><i>as a mixed occupancy structure and hence trigger full NFPA-13 sprinkling and associated 2" water service with accompanying quarterly fees in perpetuity. Covenanteeing the property could be a way to allow common houses without burdening them with these additional costs/regulations.</i></p> <ul style="list-style-type: none"> <li>• Don't layer on additional restrictions often associated with cottage cluster codes that rarely, if ever, get used (e.g. min. covered porch areas, design restrictions, fences, ...)</li> </ul> <p><i>Commentary: Many cottage cluster codes have rarely, if ever, been used. This is reminiscent of ADU codes from around the country with low utilization rates. Over-regulation may be a driving cause in both instances. In cities where regulations have been trimmed back on ADUs, numbers have typically increased. Given the public policy benefits of cottage cluster housing, it makes sense to try reducing regulations so they are more likely to get developed as an alternate to traditional single family homes (which would be larger and more expensive). Any design restrictions (e.g. historic design, community design standards, street window glazing requirements...) that would apply to single family homes would also apply to cottage cluster homes. But additional design requirements specific to cottage cluster homes should be avoided.</i></p> <p><b>(Version 2a) Single lot cottage cluster through a Planned Development:</b></p> <ul style="list-style-type: none"> <li>• Type Ix PD process for: <ul style="list-style-type: none"> <li>○ Lots less than or equal to 15,000sf;</li> <li>○ Preserves an existing home; and</li> <li>○ Doesn't take advantage of the density bonus portion of the cottage cluster code.</li> </ul> </li> </ul> <p><i>Commentary: Make the land use process as easy as possible for someone who is preserving an existing home on a relatively small lot and not using the density bonus provision.</i></p> <ul style="list-style-type: none"> <li>• Type II PD process for all other situations</li> </ul> <p><b>(Version 2b) Subdivision cottage cluster:</b></p> <ul style="list-style-type: none"> <li>• For cottage cluster homes in R5 – R20 zones, lots must meet the minimum lot dimension standards stated in Chapter 33.611, Lots in the R2.5 Zone.</li> <li>• For cottage cluster homes in the R2.5 zone, there are no minimum lot dimension standards for the new lots.</li> </ul> <p><i>Commentary: This mimics the way corner duplex lots are treated under existing code (33.110.240.E.3.). Cottage cluster homes on separate lots could be attached (up to 2) or detached.</i></p> <ul style="list-style-type: none"> <li>• Type Ix, Iix or III procedure based on thresholds applicable to subdivisions or partitions of the same number of lots.</li> <li>• Compatible with Common Greens or Shared Courts (see 33.654)</li> </ul>
11/30	<p>I've filled out your more structured survey, but wanted to include some free-form comments as well:</p> <ol style="list-style-type: none"> <li>1. Please consider if and how it would be appropriate to have FAR or unit bonuses next to higher intensity zones. In today's code, a lot adjacent to a commercially zoned parcel gets an extra unit. This could be expanded to structures sharing a rear lot line with a commercial or multi-dwelling zoned lot.</li> </ol>

2. Please reconsider the front setback proposal. This is not a particularly forward-looking urban layout, but even if this is really desirable, please consider loosening the standard to allow setback matching of any lot on the same block face.

I understand that the better housing by design project proposes to modify setbacks for some multi dwelling zones. Setback creep should be kept to a minimum. Please coordinate and agree that future development in all residential zones will have compatible setbacks.

Finally, I'm concerned that adding another five feet to the front setback is going to make the geometry for detached ADUs or other accessory structures more complicated.

3. It appears that the affordable housing bonus is intended to be managed in a way that only subsidy-funded (not just non-profit) developers could take advantage of, and this seems intentional. I think this is misguided, for two reasons, and this allowance will almost never be used.
  - a) There is an extremely limited amount of funding available for subsidized housing, and so even if it weren't true that almost all development in single dwelling zones is done for-profit, this provision would still be rarely exercised.
  - b) The affordable housing unit bonus directly ties density to perceived poverty. I'm young enough that I still remember making under 60% AMI, but many other residents aren't. I can think of no better way to build hostility in increasingly expensive and exclusive single-dwelling areas of the city than this. I am not a developer, but rationally, I would expect a subsidized building to have a less attractive exterior to try to compensate for the expense of the subsidy. So... density, poverty, less attractive buildings.

A better policy might allow a single below-market-rate unit or a fee-in-lieu at some semi-annually-adjusted amount for the extra unit. This would allow the provision to be exercised when it makes financial sense, and still be available to non-profit developers. As a bonus, the tie between density and poverty is much weaker.

4. Please consider your proposal to consider the height of a dormer if based on its distance from the outer wall. A better rule might base the height contribution on distance from the property line (and not the setback).
5. Please fold the (A) overlay provisions into the base code for the entire city.
6. Consider how an owner-occupied duplex with an ADU would be treated under proposed relocation fee ordinances.
7. There is seemingly a provision of current code allowing land divisions for fee simple ownership of attached houses on 5000 square foot R5 corner lots. Can this be made available for attached houses on non-corner lots?

8. There are many conforming R5 lots, especially in inner-ring neighborhoods, that are substantially smaller than 5000 square feet. It's clear from the staff report that you don't want to see a conforming lot split to double the permissible density of the site, but it would be a shame to force the 3600 sq. foot lots in Buckman (like the one I own) to pay to be rezoned because they're slightly too small to qualify for the extra unit.
9. Visitability is pretty neat, but I don't think an adjustment should be necessary to get a ramp into a basement. Your staff report seemingly waves away the difficulty of finding space for stairs that could wrap around the house inside the magic 5-foot zone. This almost certainly will not be possible with a ramp to the basement, since ramps have a very mild maximum slope they will typically need "switch backs" to get below grade. Please consider how this could be done without an adjustment, and if this allows more flexibility for basement stair placement, that would be wonderful also.

Thank you,

SE 62nd Ave., Portland, OR 97215

11/30

Dear City Staffers and Decision Makers,

Thanks you for all the great work you do and for moving Residential Infill Project forward.

My comments on the RIP discussion draft echo those of Portland for Everyone.

My basic recommendation are:

1. Scale of Houses:

- Keep scale as proposed
- add: increase Floor Area Ratio for duplexes and Triplexes to make them pencil out for developers.

2. Housing Types:

- Keep provisions Duplexes on all lots, Triplexes on Corner lots, Two ADUs with one Duplex and
- Change allowance form one extra unit if all are affordable to allow extra units if one is affordable, and additional FAR for family-sized affordable units.

3. Narrow Lots

- Change from 'a' overlay 1/4 mile form centers and transit corridors to allow in ALL single dwelling ones

	<ul style="list-style-type: none"> <li>• Keep rezone historically platted narrow lots to R2.5</li> </ul> <p>4. Preventing Demolitions:</p> <p>Change from 'a' overlay 1/4 mile form centers and transit corridors to allow in ALL single dwelling ones</p> <ul style="list-style-type: none"> <li>• Allow internal conversions into 2-4 units for any house more than 10 years old.</li> <li>• No density limit for historic resources.</li> <li>• Allow flexible site plans reduced parking requirements and additional FAR</li> </ul> <p>5, Cottage Clusters</p> <ul style="list-style-type: none"> <li>• Allow as either Portland Developments of Subdivisions</li> <li>• Provide a density bonus for smaller houses</li> <li>• Provide an additional density nobus for fully accessible houses</li> </ul> <p>Thank you for considering the updates.</p> <p>Cully Homeowner</p>
11/30	<p>Morgan Tracy –</p> <p>Please register my objections to the A Overlay of the Residential Infill Project. While I support the provisions of this project to limit house size, I oppose strongly the provision to allow multiple units on my street in Multnomah Village and generally in my neighborhood. What this overlay does is to drastically alter the neighborhood without gathering input from city residents. This change is so sweeping it should be put to a city-wide vote. The people themselves should decide what they want to happen to the city in which they live.</p> <p>The existing zoning can accommodate the additional housing Portland will need. There are places where it make sense to do more dense redevelopment, such as Hillsdale where the residents have been supportive of this project. But in Multnomah village, we oppose this overlay which would destroy what makes our neighborhood a healthy and enjoyable place to live. The urban forest, so important to us, will be destroyed if this proposal is enacted. Our yards will become construction sites. Our streets will become clogged with parked cars and cars trying to wind their way through what's left of the street.</p> <p>Multnomah Village will become not a quiet and lovely neighborhood, but a maze of construction projects that make it dangerous to live, walk or drive in its confines. This proposal is bad land use planning because it does not follow the guidance of a comprehensive plan and should be abandoned.</p> <p>Please listen to the people who live here. Remove the A Overlay from Multnomah Village and allow people to decide their own destinies.</p>

	<p>Sincerely,</p> <p>SW 33rd Avenue, Portland, Oregon 97219</p>
11/30	<p>Dear Project Manager Tracy and City Council Members:</p> <p>I support those provisions of the Residential Infill Project (RIP) that retain the character of Portland's existing neighborhoods. Reducing the scale of new housing, measuring building heights from the lowest point of the lot, and averaging setbacks will allow infill to blend into the neighborhoods. These provisions will assure that Portland grows in a way that protects its existing neighborhoods and current residents.</p> <p>I oppose the RIP's A overlay. It adds capacity that is not needed. The Draft 2035 Comprehensive Plan clearly states that there is more than enough capacity under the current zoning for the growth that is projected through 2035. There is no need to add additional capacity for 85,000 units of unaffordable housing or 170,000 units of affordable housing. The RIP's A overlay adds these capacities by increasing the number of housing units allowed in the base zones. It will turn single-family zones into multifamily zones. I do not accept the flawed concept of the A overlay.</p> <p>My wife and I have lived in our current location for over 30 years. We were very careful to buy a house on a large lot in a neighborhood of large lots and modest homes. We raised three children here, have spent three decades improving our property and hoped to retire and live out our lives here. Your A overlay would convert our neighborhood into something very different; something we do not want. Citizens should have the benefit of their investment-backed expectations.</p> <p>If additional capacity is needed, then I support land-use planning best practices that require that base zones be changed in the Comprehensive Plan with community input. This approach would be consistent with Oregon's Land Use Goals. I urge you to remove the A overlay from the RIP.</p> <p>Please add my comments above to the record.</p> <p>SW Troy Street, Portland, Oregon 97219</p>
11/30	<p>Any plan that only values quantity with absolutely no regard for quality is deeply flawed. This proposed RIP plan packs as many people into East Portland without a thought to the quality of life such ill conceived density will create. Supposedly thousands of people will be moving to Portland in the near future. Yet not all of Portland will be required to take this growth. The SE is expected to bear a disproportionate and unfair burden fo new density. Inner East Portland is already contains some of the densest neighborhoods in the city. This fact is evidenced by the current over used, worn parks that are in SE Portland. The streets narrow from all the cars parked on streets due to density without required parking. Public transportation is jammed pack full for all commuters in the inner East side. What started as a plan to put high rise density along transportation corridors has somehow morphed into a plan to destroy all family friendly neighborhoods. There are no plans for new parks in this area. There are no plans for new schools in this area. Where will families live in Portland? Is</p>

	<p>it time for another flight to the burbs? Recent surveys indicate many Portlanders are fed up and looking to move out of Portland.</p> <p>This current plan is nothing but a give away to developers. Pricing is not about size, it's about location, location, location. Lower priced homes that might need some work will be snapped up by developers building big houses for big profits. High rise apartments for young singles, not families, are going up all over.</p> <p>Some consideration should be given to the current political climate. Home ownership may no longer be available to many if the mortgage interest deduction disappears. Will people still be moving to Portland if our high state and local taxes can no longer be deducted from our Federal taxes? A cautious and more incremental approach seems more prudent and responsible.</p> <p>This proposed plan will adversely affect the livability of Portland's inner neighborhoods. Stop and consider quality of life when planning for our future. RIP is this current form does not.</p> <p>SE Ankeny, Portland, OR. 97214</p>
11/30	<p>My comments regarding the Residential Infill Zoning Amendments:</p> <p>It is at least improper, and ought to be illegal, for the RIP committee to include members who stand the benefit financially from the upzoning proposed in the latest draft of the proposal. This conflict of interest has not gone unnoticed, nor will it be forgotten.</p> <p>Notwithstanding, the current plan should not be implemented until important questions are answered:</p> <ul style="list-style-type: none"> <li>• The current proposal does not address loss of embodied energy and carbon cost the increased demolitions and new construction. Unless offsets are mandated and enforced, the current plan is an environmental disaster.</li> <li>• Likewise, the current proposal does not address the increased temperatures as the loss of tree cover and expanded built surface area increases the urban heat-island effect.</li> <li>• Nor does the current plan address the increased storm-water run-off as hardscape and dwellings cover permeable ground. What will keep the Willamette between its banks in the next twenty or fifty years?</li> <li>• The current plan does not address the upgrades to utilities and infrastructure required by the increased density.</li> <li>• The current plan cannot but reduce single family housing and owner-occupied housing. This will inevitably have the effect of moving money out of the local economy as rental properties are are purchased by RITs and private rental companies located away from Portland.</li> </ul>

	<p>Increasing density in the the high-demand close-in neighborhoods will not decrease housing costs as much as it will increase the stock of high-rent properties and act against the stated goal of increased density inside the urban growth boundary. Families will move away from the the close-in neighborhoods to find lower housing costs. This will mean more and longer commutes by car as children are shuttled around and parents commute to jobs away from the neighborhoods. This will mean more congestion on the thoroughfare routes. The effect will also be to depopulate the neighborhood schools and create more childless ghettos.</p> <p>Furthermore, the current plan discards the existing comprehensive plan out of hand. The projected housing demand can be met without increased demolitions, without the destroying the character of the city or the quality of life for those already living here.</p> <p>Regards,</p> <p>SE 16th Ave., Portland, OR [signed by two individuals]</p>
11/30	<p>Hello –</p> <p>My family and I live in the Collins View neighborhood in SW; have owned the property for 20 years; and have been a resident of Portland for 40 years.</p> <p>I have read thru the Project Draft and agree with its proposals. They are thoughtful and do take into consideration efforts to maintain the character and ‘livability’ of our neighborhoods while finding reasoned methods to accommodate expected growth.</p> <p>On the other hand, I believe the opposition to the Project made by the SWNI Board of Directors does NOT represent the opinions of the majority of residents in the SWNI district. I have confirmed this view by discussing the Draft with 8 of my immediate neighbors in Collins View. The SWNI board seems to be taking an overly protective, restrictive, and short-sighted view of how best to accommodate future growth. Some of the bullet points in their submission appear to be based on a misunderstanding of specifics in the Draft. For example, they incorrectly claim that “the RIP allows three unaffordable unites of four affordable units on almost all properties in the A overlay” (emphasis added). In fact, none of the properties on my street nor on neighboring streets are effected by the A overlay; only the corner lots are covered. Making such sweeping generalities serves no legitimate purpose, other than protecting the status quo and/or pushing development out of our neighborhood and onto others.</p> <p>regards...</p>
11/30	<p>Re: Draft Residential Infill Project - Remove the A Overlay</p> <p>I support those provisions of the Residential Infill Project (RIP) that retain the character of the existing neighborhoods. Reducing the scale of new housing, measuring building heights from the lowest point of the lot, and averaging setbacks will allow infill to blend into the neighborhoods. These provisions will assure that Portland grows in a way that protects the great place that it is today.</p> <p>I oppose the RIP's A overlay that will affect 85,000 properties in the City. It adds capacity that is not needed. The Draft 2035 Comprehensive Plan clearly states that there is more than</p>

	<p>enough capacity under the current zoning for the growth that is projected through 2035. There is no need to add additional capacity for 85,000 units of unaffordable housing or 170,000 units of affordable housing. The RIP's A overlay adds these capacities by increasing the number of housing units allowed in the base zones. It will turn single-family zones into multifamily zones. I do not accept the flawed concept of the A overlay.</p> <p>If additional capacity is needed, then I support land-use planning best practices that require that base zones be changed in the Comprehensive Plan with community input. This approach would be consistent with Oregon's Land Use Goals. I urge you to remove the A overlay from the RIP.</p> <p>Please add this to the record.</p> <p>Thank you,</p> <p>SW Moss ST., Ptld, OR 97219</p>
11/30	<p>Hello:</p> <p>Please accept the attached comments on the Oct 2017 Residential Infill Project code revisions.</p> <p>Thanks,</p> <p>Home: NE Hoyt St Portland, OR 97232 / Office: SE Water Ave Portland, OR 97214</p> <p>[From attachment:]</p> <p>Dear Mr. Tracy:</p> <p>Thank you for the opportunity to comment on the October 2017 discussion draft of the proposed Residential Infill Project (RIP) code revisions.</p> <p>As a member and supporter of the Portland For Everyone coalition, I urge you to consider the comments and suggestions from P4E in future RIP code revisions. I believe that additional measures are needed in the draft code to safeguard and incentivize both affordable housing and tree conservation. As housing prices escalate and redevelopment threatens urban trees, we need a thoughtful package of code revisions like those suggested by P4E and others I suggest below. We need these changes to strengthen the proposed code, preserve urban forest canopy, and foster investment in gentle infill development that supports more affordable housing choices.</p> <p>I was disappointed to see that BPS staff ignored the City Council's requests from last year to address tree preservation in relation to the new RIP code provisions. Below I have outlined two suggested code edits on front setbacks (A1 and A2), five suggested edits related to off-street parking requirements (B1-B5), and one tree code edit at C. Some or all of these edits could work together to better protect trees under the proposed RIP revisions. However, the suggested edits under B4 and B5 are really choices – you wouldn't want to do both. Suggested additions below are <u>underlined</u>, and deletions are <del>lined out</del>.</p>

A. Front setback:

The current discussion draft proposes an increased setback for new homes in certain higher density residential zones. This change could impact trees in rear or side yards, since it would be easier for a developer to obtain a tree removal permit than to secure an adjustment or variance from these setback requirements. The new code should give greater emphasis to on-site tree preservation than to front yard setbacks. Two proposed code changes are suggested as follows.

Option A1 – Retain the existing 10-foot front setback in R7, R5, and R2.5 zones. Do not increase the front setback to 15 feet as proposed in the current discussion draft in Table 110-3.

Option A2 – With or without acceptance of option 1, above, add an additional exception to the required setbacks at 33.110.225 D. as follows to create more flexibility for on-site tree preservation:

D.5 Tree preservation. The front building and garage entrance setback may be reduced to zero if it would prevent a tree that is 12 inches in diameter or greater in the rear or side yards from being removed and prevent no more than 25% of the tree's root protection zone from being disturbed, as required for preserved trees under Title 11, Figure 60-1. Where a side lot line is also a street lot line the side building and garage entrance setback may be reduced to zero. This allowance is automatic and does not require the developer to go through an adjustment/variance process.

B. Off-street parking requirements:

Although the proposed changes represent small steps forward for the City, they are relatively tiny reforms, and we would like to see the City do more to eliminate additional off-street parking requirements within the residential zones to make more space for new affordable housing choices and trees. There are several options for removing/reducing off-street parking requirements from residential lots, across all or a part of the residential zones as follows.

Option B1 – The proposed code adds an exception to the City's off-street parking requirements for all narrow lots, for both those created historically and new ones (the current code only exempts historical narrow lots from off-street parking requirements, not new ones). One change suggested change would be to make the narrow lot threshold higher than the proposed 36 feet, to capture a larger share of residential lots in the City where off-street parking requirements would be waived. This threshold could be raised to 50 feet as follows:

33.110.260 Additional Development Standards for Narrow Lots

B. Where these regulations apply. The following additional development standards apply to all single-dwelling zoned lots, lots of record or combinations thereof that are less than or equal to 36 50 feet wide. Lots in planned unit developments are exempt from these additional standards.

C. Standards. 3. Parking and access. No off-street parking is required. If parking is provided, and the lot, lot of record, or combination of lot or lot of record abuts and alley, vehicle access must be from the alley.

Option B2 – The proposed code at 33.205 (Accessory Dwelling Units) addresses what to do with existing parking and new ADUs. The code clarifies that no additional parking is required for ADUs (a good thing!) but also that existing required parking must be maintained or replaced on site (a bad thing!). The latter pits required off-street parking against space for affordable housing and trees. I would suggest the following revisions, which would probably have to be implemented in concert with other code changes to 33.266 (Parking and Loading) – see Option 4 below.

#### 33.205.040 Development Standards

C. Requirements for all accessory dwelling units. 2. Parking. No additional parking is required for the accessory dwelling unit. Existing ~~required parking must be maintained or replaced on site~~ spaces may be redeveloped for new housing if two or more on-site trees greater than or equal to twelve inches in diameter are preserved.

Option B3 – The proposed code at 33.266 (Parking, Loading and Parking Demand Management) revises standards for off-street parking in residential zones. All of the proposed changes appear to support reduced on-site paving requirements, particularly for triplexes and for sites in the R7 and R10-RF zones. All these changes deserve strong support and we should resist attempts to weaken or remove the proposed code changes here. Beyond this defense of the proposed changes, one way to strengthen the code and further reduce off-street paving for parking would be to make fourplexes eligible for these new standards as follows.

#### 33.266.120 Development Standards for Houses, Duplexes, ~~and~~ Triplexes and Fourplexes.

B. When these regulations apply. The regulations of this section apply to houses, attached houses, duplexes, triplexes, fourplexes, manufactured homes, etc.

Option B4 – The proposed code at 33.405.050 Accessory Dwelling Units, Duplexes, and Triplexes was written to define standards for new or converted housing. Off-street parking requirements are waived for certain sites protecting historic resources or using an affordable housing bonus provision (at 33.405.070 and 33.405.080, respectively), but the parking waiver does not apply to other sites and there is no link to incentivizing on-site tree preservation. Elsewhere in the code under Parking and Loading, reductions in off-street parking requirements are linked to on-site tree preservation in the current Parking and Loading code but it was written mostly for larger multi-family housing sites. I suggest the following changes to make it applicable in single-family residential zones.

#### 33.405.050 Accessory Dwelling Units, Duplexes and Triplexes

D. Standards. 5. Minimum parking may be reduced by one parking space for each tree 12 inches in diameter and larger that is preserved. Required on-site parking may

be reduced to zero under this provision. However, if all parking is removed, the curb cut must be removed.

Along with this edit, the Parking and Loading code would have to be revised as follows:

33.266.110 Minimum Required Parking Spaces. D. 2. Exceptions

a. Exceptions for sites where trees are preserved. Minimum parking may be reduced by one parking space for each tree 12 inches in diameter and larger that is preserved. A maximum of 2 parking spaces or 10 percent of the total required may be reduced, whichever is greater. However, required parking may not be reduced below 4 parking spaces under this provision, except within the residential ‘a’ Housing Opportunity overlay zone, where the minimum off-street parking requirement may be waived to zero under this provision.

Option B5 – In the current proposed code ADUs don’t count as housing units for triggering minimum off-street parking spaces. This is a crucial element of the proposed code to defend at 33.205.040.C.2 (ADU Development Standards). However, main housing units (as in duplex and triplex units) still do count and the requirement remains 1 off-street parking space per 1 main housing unit, as set forth in Tables 266-1 and 266-2 in 33.266 (Parking and Loading). To maintain open space for existing/future trees and minimize curb cuts for off-street (which eliminate street tree planting sites), we should find additional avenues to eliminate/reduce offstreet parking requirements in some or (radically!) all residential zones. This is likely to be contentious, but short of eliminating all residential zone off-street parking you might try the following suggested edits.

33.266 Parking and Loading

33.266.110 Minimum Required Parking Spaces Table 266-2

[under Standard A] 1 per unit except SROs exempt and in RH, R1, R2, R2.5, and R5, where it is 0 for 1 to 3 units and 1 per 2 units for four + units [to Household Living]

More radical would be this change:

[under Standard A] 1 per unit except SROs and residential sites within the ‘a’ Housing Opportunity zone exempt and in RH, where it is 0 for 1 to 3 units and 1 per 2 units for four + units [to Household Living] and 1 per-4 8 units [to Group Living]

Along with either of these changes could be the addition of a requirement to dedicate any newly eliminated curb cuts to spaces for street trees. I’m actually not sure where to put this in the code (it probably belongs in Title 11). For either of the above-suggested table changes, there is strong precedent for waiving off-street parking for new affordable multi-family housing units (adopted in 2016). The above changes would extend this to certain single-family residential zones where there is the greatest opportunity for infill residential housing.

C. Tree code exemptions for small residential lots:

The Tree Code tree preservation standards at 11.50.040 should be revised as follows to apply to more sites within the residential zone where the new residential infill standards will

	<p>apply. This change would remove the exemption on tree preservation standards for small residential sites.</p> <p>11.50.040. Tree Preservation Standards</p> <p>A. Where these regulations apply.</p> <p>1. Except when exempted by Subsection B., below, this Section applies to trees within the City of Portland and trees on sites within the County Urban Pocket Areas in the following situations:</p> <p>a. On sites. Development activities with ground disturbance or a construction staging area greater than 100 square feet on unpaved portions of the site where there are Private Trees 12 or more inches in diameter and/or City Trees 6 or more inches in diameter and the site:</p> <p><del>(1) is 5,000 square feet or larger in area; and</del></p> <p><del>(2) has existing or proposed building coverage less than 85 percent.</del></p> <p>Again, we thank you for the opportunity to provide these comments. I understand that there are still several opportunities for public comment before us and I look forward to engaging with you, the PSC and City Council on needed reforms.</p> <p>Sincerely,</p>
11/30	<p>Hello,</p> <p>I'm a resident of the Irvington, where we have a fair amount of density, including Dahlke Manor and Grace Peck Terrace, low-income, high-density housing. While I support infill and increasing density, I do not support the Residential Infill Project proposed as a blanket on a city with distinct neighborhoods.</p> <p>I spent years living in Carmel, California, which fought hard to keep the sense of place that made the city what it was. They too had small houses on small lots. These houses would get demolished and be replaced with maximum FAR and coverage structures that were out of place with the neighbors, street, and area. Even with attempts at limiting the nature of change the residential parts of the city, out-of-proportion houses went up. Many neighborhoods in Portland have character worth preserving.</p> <p>The current proposal does not allow the neighborhoods to keep their distinct, existing nature. Some neighborhoods might be well-suited for the RIP proposal, but most are not. Each neighborhood should get to decide on the nature of development going on. No one is talking about stopping development, just adjusting what is allowed based on the existing nature and look of the neighborhood. Irvington has a history of multi-family homes. They were historically designed to have a single-family look to integrate with the neighborhood. It worked, and Irvington has a healthy density that's already increasing with the existing ADU regulation. The Land Use Committee has approved every ADU that has come through.</p>

	<p>Again, I support increased density. RIP is not the way to do it.</p> <p>Allowing most demolition does not increase density as has been shown.</p> <p>Lots just get a bigger two bedroom home on them. RIP appears to me to be a real estate developer's solution that actually does not solve the housing problems Portland faces.</p> <p>Don't rubber stamp a solution that doesn't fit every neighborhood. It's not good governance.</p> <p>NE Hancock ST., Portland, OR 97212</p> <p>[For what it's worth, I have a Master's in Urban Planning from UO.]</p>
11/30	<p>My biggest concern is that any regulations which encourage demolition will displace existing residents, increase the cost of housing and make the neighborhood accessible only to the wealthy.</p> <p>I'm not convinced that making the scale of housing more compatible and other changes will be enough incentive to avoid demolitions.</p>
11/30	<p>I find the Residential in fill process(rip), a rip for neighborhoods. The advisory panel was overloaded with building industry or with people with building industry ties, for a total of 15 people.. the vote, 15 for and 7 against shows ow lopsided the committee was.</p> <p>Whatever limits, the staff thinks is in the process, the developers do not. I have seen adds for 8,000 sq feet corner lots. Developers tell me that houses that are 65 feet tall can be built.</p> <p>the whole process is done to degrade the livability of the existing residents for someone who might come to Portland. There is nothing in the Rip, except the death of neighborhoods.</p> <p>I object to the rezoning of North Portland and the increase of density that will bring 2x to 5 times as many people as are currently residing here. No new public features, like schools or parks are planned.</p> <p>I object to the rezoning of my property 6535 N Fenwick to r-2.5 from single family. At present. there is a 4.4 to 6% vacancy rate in Portland and 5,000 to 6,000 vacant apartments priced at luxury rates. Why are more building s needed?</p> <p>I object to the Rip and it should be halted.</p> <p>Thanks in advance</p>
11/30	<p>To members of the City Council, Planning and Sustainability Commission, and BDS,</p> <p>I write to congratulate you on an excellent and thoughtful first effort at meaningfully amending much of inner Portland's residential zoning in a way more in line with adopted city policy and with the current and future needs of citizens. With that said, I urge you to consider a reformulation with a more specific focus on increasing housing supply and thereby improving affordability.</p>

	<p>As the city staff clearly understand, the primary driver behind housing unaffordability is lack of supply. Furthermore, those neighborhoods that most closely resemble 'complete communities' that truly provide ample opportunity for work, life and play, lack of affordable housing is even more acute. The 'a' overlay corresponds very much with these same areas of Portland. Thus, it seems clear that the new overlay should be focused on increasing the supply of housing in these areas. Instead, it offer no incentives for additional units.</p> <p>I urge the city to increase the number of allowable units per lot in the new 'a' overlay to 4 without condition. Additionally, for each additional unit built, an incremental increase in allowable FAR and a decrease in SDC charges should be offered. This would mean that for every additional unit built the cost of development per unit would go down: incentivizing more reasonably sized units within our neighborhoods. Additionally, for any structure built that has more than one unit (duplex, triplex, 4-plex), the new height and front set-back rules should be waived or significantly relaxed. Once again, lets hit the gas on making our city dense and full of housing that many people can afford in the neighborhoods that offer the most amenities.</p> <p>I would encourage you to offer the 'a' overlay to more if not all of Portland. It is strange indeed to call something an 'opportunity' overlay, and then deny it to the neighborhoods that the city seems to acknowledge have the most need of new opportunity. Moreover, were to city to reformulate the proposal in such a way as to incentivize more housing supply, the RIP could help to reduce displacement and increase mix-income neighborhoods by increasing affordability and range of housing options.</p> <p>Respectfully,</p> <p>SE 33rd Pl., Portland, OR 97202</p>
11/30	<p>Dear Project Manager Tracy and City Council Members:</p> <p>I support those provisions of the Residential Infill Project (RIP) that retain the character of Portland's existing neighborhoods. Reducing the scale of new housing, measuring building heights from the lowest point of the lot, and averaging setbacks will allow infill to blend into the neighborhoods. These provisions will assure that Portland grows in a way that protects its existing neighborhoods and current residents.</p> <p>I oppose the RIP's A overlay. It adds capacity that is not needed. The Draft 2035 Comprehensive Plan clearly states that there is more than enough capacity under the current zoning for the growth that is projected through 2035. There is no need to add additional capacity for 85,000 units of unaffordable housing or 170,000 units of affordable housing. The RIP's A overlay adds these capacities by increasing the number of housing units allowed in the base zones. It will turn single-family zones into multifamily zones. I do not accept the flawed concept of the A overlay.</p> <p>My husband and I have lived in our current location for over 30 years. We were very careful to buy a house on a large lot in a neighborhood of large lots and modest homes. We raised three children here, have spent three decades improving our property and hoped to retire and live out our lives here. Your A overlay would convert our neighborhood into something</p>

	<p>very different; something we do not want. Citizens should have the benefit of their investment-backed expectations.</p> <p>If additional capacity is needed, then I support land-use planning best practices that require that base zones be changed in the Comprehensive Plan with community input. This approach would be consistent with Oregon's Land Use Goals. I urge you to remove the A overlay from the RIP.</p> <p>Please add my comments above to the record.</p> <p>SW Troy Street, Portland, Oregon 97219</p>
11/30	<p>Dear Mr. Tracy,</p> <p>I have attached my comment letter regarding the RIP proposal for the section of Rose City Park neighborhood between NE 57th Ave, NE Sandy Blvd, NE 60th Ave and NE Broadway. This proposal does not address the RIP concerns to reduce demolitions, create affordable housing or directly benefit under-served residents of Portland and it only further exacerbates problems related to infrastructure, traffic and housing costs. I have copied members of our City Council and the Northeast Portland representative for the Portland Planning Bureau on these comments to ensure that issue is not cloaked in the secrecy of a legislative decision void of community input.</p> <p>This is not a NIMBY response, but rather a cry for help to city planners and officials to address the reality for its citizens and to provide the support and plan to best serve residents rather than just line the pocketbooks of developers. The RIP proposal to double density in our neighborhood without sufficient time for comment, consideration, or community input on the planning process. I welcome the opportunity to discuss these comments further and to work with the City and our neighborhood association to create a proposal that we can live with and that best serves all of our communities.</p> <p>Best regards,</p> <p>NE 59th Avenue, Portland, Oregon 97213</p> <p>[From attachment:]</p> <p>Dear Mr. Tracy:</p> <p>I live within the portion of Rose City Park neighborhood that the Portland Planning Bureau ("PPB") has decided to rezone from R-5 to R-2.5 to appeal to developers under the guise of social and racial justice for our City's underserved residents and additional housing for the City's growing population. The current proposal to return to the original lot lines as a way to address the current housing and service needs in Portland is disingenuous at best and destructive at worst. PPB's rezoning of Rose City Park Neighborhood increases pressure on the existing community infrastructure, does not address the concerns that created of the Residential Infill Project ("RIP") and it does not address the actual needs of Portland's underserved neighborhoods or need for additional affordable housing.</p>

## Increased Pressure on the Existing Infrastructure

Utilities. This section of Rose City Park Neighborhood has suffered through Portland Water Bureau's pipe replacement project over the last three years. This construction has closed streets and cracked existing clay connection pipes. I question that the Water Bureau would have significantly increased the number of access portals or double or triple the deliverable volume to handle to increase water and sewer volumes. Additionally, NE 59th Avenue was not paved properly and avoiding potholes and pavement ripples makes the car ride feel like a whitewater rafting trip. Our neighborhood garbage, recycling and compost hauler's trucks have to maneuver on a road crowded with on-street parkers. In some instances, trucks (including emergency vehicles) have been unable to get through and have had to seek alternate routes. The RIP proposal to remove requirements for off-street parking would exacerbate this difficulty. First responders, garbage truck and delivery vehicles may be relegated to parking at the end of a block and walking (running?) to their intended destination.

Schools. Rose City Park Neighborhood just received an official elementary school assignment last week. Even with the assignment of RCP School as the neighborhood elementary (K-5) school, attendance is projected to exceed 89% capacity within 5 years which is the school district's threshold for an "overcrowded school." Additional housing units within this school boundary will accelerate the crowding and resource imbalance for RCP neighborhood children. As a parent of two small children, I have been involved in the current PPS Northeast Portland Boundary Adjustment and have been frustrated with the difficulty of this process. Is the City willing to provide additional resources and/or consideration to Portland Public Schools to redistrict or reallocate resources due to the random assignment of residential density?

Transit. Only designated transit route near the proposed RIP rezoning area is TriMet's bus route number 12 which runs along Sandy Blvd. When I have ridden the bus, there are no seats available when the bus arrives at the Sandy & NE 57th Avenue bus stop during morning rush hour. To add insult to injury, often several route 12 buses deny pick-up downtown for evening rush hour due to overcrowding. I have had the same experience with MAX light rail during morning and evening commutes. A significant addition to the number of housing units in this neighborhood requires significant increase in the quantity and frequency of service of this route. Additionally, frequent service (at least every 15 minutes) would also need to be added for bus routes 24, 71 and 77 to serve commuters heading to other areas of the City. Is the City willing to provide additional resources and/or consideration to TriMet so that it can increase operations to serve this small, but dense area supposedly designed for public transit commuting?

Traffic. It is important to note that while the City and PPB desire residents without cars, the vast majority (86.3% in 2016, a 1 % increase over 2015) of households have at least one car and that car will need to be parked somewhere. The current RIP proposal removes requirements for off-street parking for multi-unit development and that would place at least 3 additional cars on the street per multi-unit development. Additionally, as residents often commute to commercial districts, they will be commuting on increasingly congested roadways increasing both commuting and rush hour duration. Rose City Park is served by Sandy Boulevard - a four lane surface street and Halsey Rd2 and NE 5th Avenue - each two

lane surface roads. The interior neighborhood streets designated for RIP - NE 58th Avenue, NE 59th Avenue and NE 60th Avenue are 20-ft wide neighborhood streets and as mentioned above, these streets are often crowded with on-street parking. Additionally, during school pick-up and drop-off, special events at RCP School or RCP Methodist Church, and busy customer hours for businesses along Sandy Boulevard further crowd neighborhood streets to the point of blocked driveway and difficult navigation. None of these roads are planned for expansion to handle additional vehicles.

Does not address concerns that initiated RIP

From the City's own publication<sup>3</sup>, the Residential Infill Project was initiated to address overlapping concerns related to these changes:

- The number of demolitions and the size of infill houses.
- Increasing housing costs and the loss of affordability.
- Lack of housing choices, especially in high-opportunity neighborhoods.
- The impact of narrow lot development rules on both neighborhood character and the loss of opportunities for needed infill housing.

Unfortunately, the proposed rezoning of a segment of Rose City Park neighborhood does nothing to address any of these concerns. This plan to require multi-unit residential development in the middle of a neighborhood zoned R-5 is inconsistent with adjacent streets and does not follow the stair-step density increases called for in Portland's Comprehensive Plan. This "spot zone" for double-density appears to be targeting prime family housing to provide a giveaway to developers.

The segment of Rose City Park neighborhood bounded by NE 5th and NE 60th and Sandy Blvd and Broadway has only 2 vacant lots which means that any new construction will require demolition of at least one existing home. This plan DOES NOT reduce demolitions. Secondly, the size of newly constructed homes could be addressed through increased setback requirements or maximum interior area thresholds without changing the existing zoning or lot lines.

Housing costs are rising but unfortunately, newer smaller homes are not increasing affordability of these homes. There direct evidence of the extreme housing prices that will result from the implementation of RIP in Rose City Park. In 2014 a developer constructed and sold a two bedroom "skinny house" at [redacted] NE 58th Avenue. This house sold for \$415,000 and when compared to the housing affordability statistics<sup>4</sup> maintained by the City, even with an \$80,000 down payment and a 4% interest rate, the mortgage would exceed \$2,100 per month (before taxes and insurance) - nearly 175% of the "affordable" rental rate for a 2 bedroom residence. Additionally, a modern "skinny house" was constructed at 1733 NE 59th Avenue and is currently listed for sale at \$649,000. If a buyer can provide a down payment of \$130,000, at a 4% interest rate, the monthly mortgage payment for this 3 bedroom home is approximately \$2,800 per month (before taxes and insurance) - nearly 155% of the "affordable" rental rate for a 3 bedroom residence.

The RIP proposes bonus units and other incentives for units priced at 80% MFI, but there is no evidence that pricing would remain at affordable rates and even without the bonuses, developers are raking in gigantic profits from infill housing - no matter what size it is.

RIP intends to address a lack of housing choices in high-opportunity neighborhoods, but has failed to demonstrate that Rose City Park fits the criteria for a high-opportunity neighborhood. While bordered by a single designated transit route (Sandy Blvd), it does not have the ideal transit access of the Hollywood, Laurelhurst or Brooklyn neighborhoods.

And, while there are some businesses located on Sandy Blvd, no business adjacent to this RIP "up-zone" employ more than 20 employees nor could these small businesses (3 restaurants, a bike shop and a travel agency) be considered employment attractors. There are no grocery stores, convenience stores, or parks within this "up-zone" and there is only one school and it is in need of significant seismic retrofit and ADA upgrades. Furthermore, Sandycrest Apartments are located on the west side of NE 57<sup>th</sup> Avenue and this complex has a variety of apartments and townhomes that complement the larger, family-sized homes on the east side of NE 57<sup>th</sup> Avenue. Contrary to PPB's ideas for its City's residents, most people do not dream of graduating from an apartment to a duplex, otherwise developers would be constructing duplexes throughout the City rather than larger, family-sized homes.

The RIP website states that Portland's households are getting older and have fewer people. However, this declaration may actually be a result of a lack of houses large enough for families including those with several children or multiple generations. And as a supplement, less children residing in Portland may be a result of lackluster public schools and unaffordable childcare. Families with the means to do so often relocate to Beaverton, Hillsboro, Lake Oswego and West Linn due to the availability of larger homes, great schools and thoughtful city planning.

Several times a year, I have become so frustrated with Portland (planning, schools, transportation, and housing costs) that I search for homes in neighboring cities. But I don't want to give up on Portland and I don't want to give up on my neighborhood. When we purchased our home in Rose City Park five years ago, my dream of living in a nice home in a friendly, safe neighborhood within a reasonable distance from each of our jobs came true. This place is idyllic and to change the character and composition of our street and the street directly to the east and west is a developers' giveaway by the City at the expense of its residents. Why choose these three streets and not focus density along transit routes, employment centers and community resource rich areas of the City?

#### Address the Portland's Underserved Neighborhoods

The new Comprehensive Plan finds that accommodating growth in and around Centers and Corridors is the best strategy to achieve these community goals including increased access to the benefits of healthy neighborhoods while increasing equity through more housing options, improving the market for local-serving businesses and reducing the need to drive while increasing the use of and access to transit, protecting air and water quality and reducing carbon emissions.

	<p>The best way to address Portland's underserved neighborhoods, including impoverished and minority communities such as Lents and Gateway is not to convince lower income and minority individuals to move to Rose City Park, but to invest directly in the neighborhoods in which they are already residing. Providing incentives to developers to construct new housing options - including cluster developments and duplexes in areas with lackluster options enhances those communities by encouraging mobility within their existing neighborhoods and attracting new residents.</p> <p>Portland should direct incentives to businesses such as grocers and service providers to locate in these areas. Often lower income neighborhoods are characterized as "food deserts" due to the lack of available grocery stores and markets. A focus on the elimination of "food deserts" should be the highest priority for PPB because of the associated rise in hunger, malnutrition, obesity, other significant health problems correlated to increased distance from grocers. Additionally, grocers and service businesses create jobs accessible by walking, bicycle and transit as well as providing necessary services (including personal care, laundry and restaurants) to local residents.</p> <p>Furthermore, Portland Public Schools should direct additional funds to improve facilities and instruction opportunities in underserved communities. The implementation of special programs (language immersion, special focus options and TAG opportunities) can improve neighborhood student experiences and attract students from outside neighborhoods to help balance the achievement levels throughout the district. There is no reason that any public school within the City should have significant differences in educational opportunities, resources or achievements.</p> <p>I apologize for the length of this letter as I understand that you all are extremely busy with RIP as well as the other projects and priorities of the PPB and the City of Portland, but I appreciate that you have taken the time to consider this information. I ask you to reconsider the "up-zoning" of this section of Rose City Park and follow the guidelines set forth in the City's Comprehensive Plan to concentrate density within city centers and along transit corridors. And moreover, recognize the reality of our current City including the actual use by its residents and design development to improve the lives of all of our residents. I don't want to give up on Portland, but if you do not put the needs, values and uses of its current citizens ahead of developers, we will be just one more family that will move to Clackamas County for a better life.</p> <p>I appreciate your consideration and I am available to discuss this matter in further detail either by phone at [redacted by staff] or by email at [redacted by staff]</p> <p>Best regards,</p>
11/30	<p>Hello Project Director Morgan Tracy</p> <p>Please remove the "A" overlay from the current version of the Residential Infill Project.</p> <p>I support those provisions of the Residential Infill Project (RIP) that retain the character of the existing neighborhoods. Reducing the scale of new housing, measuring building heights from the lowest point of the lot, and averaging setbacks will allow infill to blend into the</p>

	<p>neighborhoods. These provisions will assure that Portland grows in a way that protects the great place that it is today.</p> <p>I oppose the RIP's A overlay that will affect 85,000 properties in the City. It adds capacity that is not needed. The Draft 2035 Comprehensive Plan clearly states that there is more than enough capacity under the current zoning for the growth that is projected through 2035. There is no need to add additional capacity for 85,000 units of unaffordable housing or 170,000 units of affordable housing. The RIP's A overlay adds these capacities by increasing the number of housing units allowed in the base zones. It will turn single-family zones into multifamily zones. I do not accept the flawed concept of the A overlay.</p> <p>If additional capacity is needed, then I support land-use planning best practices that require that base zones be changed in the Comprehensive Plan with community input. This approach would be consistent with Oregon's Land Use Goals. I urge you to remove the A overlay from the RIP.</p> <p>Please add this to the record.</p> <p>Thank you,</p> <p>SW Moss St., Portland OR 97219</p>
11/30	<p>The first email bounced back. Please see my letter in opposition below:</p> <p>To whom it may concern,</p> <p>I know Portland is growing and needs to absorb more people in a sensible way that does not produce sprawl. Density and capacity should be achieved in a way that preserves old homes and neighborhoods. In its current form, the infill plan incentivizes the destruction of old homes instead of encouraging preservation of homes while promoting density. If there are no protections for existing homes, we risk losing the very nature of our Portland neighborhoods and encouraging wasteful and environmentally harmful practices.</p> <p>It does not make sense to pack more people in and not make any provisions or allocations for new parks, recreation, and school facilities. Density must be balanced with quality and character. We can do much better than the current proposal. I strongly oppose the infill plan in its current form.</p> <p>Sincerely,</p>
11/30	<p>Re: Draft Residential Infill Project - Remove the A Overlay</p> <p>I support those provisions of the Residential Infill Project (RIP) that retain the character of the existing neighborhoods. Reducing the scale of new housing, measuring building heights from the lowest point of the lot, and averaging setbacks will allow infill to blend into the neighborhoods. These provisions will assure that Portland grows in a way that protects the great place that it is today.</p> <p>I oppose the RIP's A overlay that will affect 85,000 properties in the City. It adds capacity that is not needed. The Draft 2035 Comprehensive Plan clearly states that there is more than enough capacity under the current zoning for the growth that is projected through 2035. There is no need to add additional capacity for 85,000 units of unaffordable housing or</p>

	<p>170,000 units of affordable housing. The RIP's A overlay adds these capacities by increasing the number of housing units allowed in the base zones. It will turn single-family zones into multifamily zones. I do not accept the flawed concept of the A overlay.</p> <p>If additional capacity is needed, then I support land-use planning best practices that require that base zones be changed in the Comprehensive Plan with community input. This approach would be consistent with Oregon's Land Use Goals. I urge you to remove the A overlay from the RIP.</p> <p>Please add this to the record.</p> <p>Thank you, SW 45 Avenue, Portland Oregon 97219</p>
11/30	<p>If you insist on using the increased density that we do not require--At least be honest about the sales tactics. What is it? The increased tax revenue? Pandering to the developers? Trying to create construction jobs? Could you take care of the homeless situation first. Give the developers incentive to build high density low income housing outside the neighborhoods, rather than unaffordable "affordable housing".</p> <p>Re: Draft Residential Infill Project - Remove the A Overlay</p> <p>I support those provisions of the Residential Infill Project (RIP) that retain the character of the existing neighborhoods. Reducing the scale of new housing, measuring building heights from the lowest point of the lot, and averaging setbacks will allow infill to blend into the neighborhoods. These provisions will assure that Portland grows in a way that protects the great place that it is today.</p> <p>I oppose the RIP's A overlay that will affect 85,000 properties in the City. It adds capacity that is not needed. The Draft 2035 Comprehensive Plan clearly states that there is more than enough capacity under the current zoning for the growth that is projected through 2035. There is no need to add additional capacity for 85,000 units of unaffordable housing or 170,000 units of affordable housing. The RIP's A overlay adds these capacities by increasing the number of housing units allowed in the base zones. It will turn single-family zones into multifamily zones. I do not accept the flawed concept of the A overlay.</p> <p>If additional capacity is needed, then I support land-use planning best practices that require that base zones be changed in the Comprehensive Plan with community input. This approach would be consistent with Oregon's Land Use Goals. I urge you to remove the A overlay from the RIP.</p> <p>Please add this to the record.</p> <p>Thank you,</p> <p>SW Capitol Hill Rd., Portland OR 97219-2638</p>
11/30	<p>Re: Draft Residential Infill Project - Remove the A Overlay</p> <p>I support those provisions of the Residential Infill Project (RIP) that retain the character of the existing neighborhoods. Reducing the scale of new housing, measuring building heights</p>

	<p>from the lowest point of the lot, and averaging setbacks will allow infill to blend into the neighborhoods. These provisions will assure that Portland grows in a way that protects the great place that it is today.</p> <p>I oppose the RIP's A overlay that will affect 85,000 properties in the City. It adds capacity that is not needed. The Draft 2035 Comprehensive Plan clearly states that there is more than enough capacity under the current zoning for the growth that is projected through 2035. There is no need to add additional capacity for 85,000 units of unaffordable housing or 170,000 units of affordable housing. The RIP's A overlay adds these capacities by increasing the number of housing units allowed in the base zones. It will turn single-family zones into multifamily zones. I do not accept the flawed concept of the A overlay.</p> <p>If additional capacity is needed, then I support land-use planning best practices that require that base zones be changed in the Comprehensive Plan with community input. This approach would be consistent with Oregon's Land Use Goals. I urge you to remove the A overlay from the RIP.</p> <p>Please add this to the record.</p> <p>Thank you,</p>
11/30	<p>Multiple family dwellings will destroy the quality of our single family residential neighborhoods and it will drive families out of Portland which is NOT WHAT YOU WANT!!</p> <p>PLEASE DON'T DESTROY OUR SINGLE FAMILY HOME RESIDENTIAL STATUS- Don't destroy our neighborhood- help us preserve what we have!!</p> <p>I support those provisions of the Residential Infill Project (RIP) that retain the character of the existing neighborhoods. Reducing the scale of new housing, measuring building heights from the lowest point of the lot, and averaging setbacks will allow infill to blend into the neighborhoods. These provisions will assure that Portland grows in a way that protects the great place that it is today.</p> <p>I oppose the RIP's A overlay that will affect 85,000 properties in the City. It adds capacity that is not needed. The Draft 2035 Comprehensive Plan clearly states that there is more than enough capacity under the current zoning for the growth that is projected through 2035. There is no need to add additional capacity for 85,000 units of unaffordable housing or 170,000 units of affordable housing. The RIP's A overlay adds these capacities by increasing the number of housing units allowed in the base zones. It will turn single-family zones into multifamily zones. I do not accept the flawed concept of the A overlay.</p> <p>If additional capacity is needed, then I support land-use planning best practices that require that base zones be changed in the Comprehensive Plan with community input. This approach would be consistent with Oregon's Land Use Goals. I urge you to remove the A overlay from the RIP.</p> <p>Please add this to the record.</p> <p>Thank you,</p>

	SW Capitol Hwy (since 1975)
11/30	<p>As a resident in a neighbourhood that is seeing lots of 1:1 demos (affordable single family homes demolished for upper class McMansions) I strongly support re-legalizing "missing middle" housing in as much of Portland as possible, including duplexes, corner triplexes, internal division of historic homes and cottage clusters. Reducing the size of new houses is a thoughtful compromise for reducing demolition, especially one-for-one demolitions that only accelerate displacement.</p> <p>More missing middle housing will be viable if the city waives on-site parking requirements near transit. Garages should be legal but not mandatory, especially since every driveway removes an otherwise good curbside space and, potentially, a tree.</p>
11/30	<p>Attached please find my comments to the City's Infill Project, which are due today.</p> <p>Thanks for your consideration.</p> <p>[From attachment:]</p> <p>To Portland Infill Project (Submitted via email)</p> <p>I am a resident affected by this project and have already submitted comments via your online survey. However, I wish by this letter to get my name into the record and to provide you with specific comments not addressed by your survey format.</p> <p>I am a retired planner and have been observing with great interest Portland's procedures in light of the major problems with housing availability and affordability in Portland these past few years. My first observation is that Portland has lost track of the need to plan comprehensively and to view planning issues holistically. This has resulted in multiple separate projects which are addressing problems in a piecemeal fashion. In such a situation, problems (more often than not) do not get resolved.</p> <p>I recently was a moderator at the joint ISOCARP/OAPA conference in Portland. I attended 2 other sessions with Portland Planning speakers who talked about the Portland Plan and the Southwest Corridor Project. In both sessions, the speakers admitted that the Portland Plan was lacking in how it addressed housing needs in light of State Goal 10 (Housing). The plan did not adequately address the need for a variety of housing types to fit a variety of income levels. This is likely one reason why there is a "missing middle" in terms of available housing and a housing affordability crisis in Portland today.</p> <p>The Infill Project is a piecemeal approach to address the above. However, it does not look at the issues of housing availability, variety and affordability in a holistic manner. In fact, this project has the potential to greatly impact the livability and character of many older established neighborhoods in Portland without consideration of the "missing middle", infrastructure needs, needs for new parks, street maintenance needs, etc. In short, this is a piecemeal approach to planning.</p> <p>The Infill Project also appears to be extremely biased in trying to "inject" substantial density into Portland's east side neighborhoods (east of the river out to I-205) with very little impact</p>

on Portland's west side. This protects the integrity of neighborhoods in west Portland while exposing thousands of acres of existing older single family neighborhoods in east Portland (which includes north Portland, east Portland and SE) to the potential for demolition of older houses and replacement by skinny homes, duplexes/triplexes, and ADU's. The density increases proposed by your half mile corridor swath rezonings, the proposed 'a' overlay, and the push for ADU's will result in increases of from 2 to 4 times the current density allowances, depending on the parent zone. The areas involved with these proposed changes will no longer be low density residential. They will, in essence, be moved into a moderate density range. Is the Infill Project attempting to make existing low density areas into areas that can accommodate the "missing middle"? If so, that is not the way concentric zoning theory works and something the flawed Portland Plan should have addressed, but evidently didn't.

As mentioned, the 'a' overlay and zone density increases along a ¼ mile radius from transit streets (a half mile swath) is a substantial change to neighborhood character. My own property is proposed by this for a change from R5 to R2.5. And my neighborhood is an older neighborhood of craftsman bungalows, cottage style, cape cod, and other varieties of homes. Under the proposal, I fully anticipate many of these homes will ultimately be torn down and replaced by skinny homes, duplexes/triplexes, and rowhomes, which will clash with existing architectural styles. I also anticipate many homes, because of the tight fit of homes on smaller lots, will not provide any landscaping or driveways, and that parking onstreet will be in complete chaos because of this new density and from all the new apartment buildings going up on nearby transit streets which do not have their own parking. In short, you're going to turn our neighborhoods into crowded ant farms, but you won't be fixing the streets, doing anything about parking problems, or adding new neighborhood level parks to accommodate the thousands of anticipated new residents. How do you justify this by the Statewide Planning Goals? Granted, the changes will not come overnight as planning doesn't work that way. However, in 20 years our neighborhoods will not be the same as now. The question then becomes, will they be better or worse?

And what about the "missing middle"? Wouldn't it make sense to hold off on the Infill Project until you can figure out how to accommodate the "missing middle"? Think of the potential to provide for housing needs if you had areas designated in moderate to medium density which could contain courtyard apartments, garden apartments, tiny home clusters, communal living clusters, etc. Take a look at the housing cluster located at SE 41st and SE Division to see how a variety of housing sizes/shapes can be located on a smallish site but including landscaping for separation and buffers. We need more of these types of developments! Again, the housing crisis should be looked at holistically, not in piecemeal fashion, as good comprehensive planning calls out for. And if you had areas identified to accommodate the "missing middle" you wouldn't need to densify the "heck" out of our traditional single family neighborhoods.

Your proposed bonus unit in the 'a' overlay for affordable housing is questionable. How would this be implemented? Also, you need to realize that the 80% mark indicated is still substantially higher than a person earning minimum wage can afford. You need to lower the bar or your level of affordability will be too high. And the push for ADU's is surprising since for years these were not considered to be viable to count as "units", but now they are?

	<p>And if you do go ahead with changing the lot size allowance per unit for R5 (from 1/5000 sf to 1/3000 sf), you should change the name of the district to R3 so as not to be misleading.</p> <p>In defense of home builders, Portland has the reputation of being the most expensive and bureaucratic city to build in within Oregon and most of Washington. Part of the problem is, the bigger Portland becomes, the more cumbersome and expensive the permitting processes. In addition, the current archaic commission form of government complicates processes because of the separation of bureaus under different commissioners leads to budget competition and lack of cooperation between bureaus. You might consider major simplification to permit processes with dedicated staff to work just in those areas and with specific processing timelines. If you improved processing and cut expenses, you would see better quality housing being constructed and it would be easier to encourage the construction of more affordable (to all) units.</p> <p>Finally, I resent that East Portland appears to be singled out for densification while the west side gets to keep its character and integrity. This type of activity has the potential to create not only a new type of gentrification within our older east side neighborhoods, but to also change the character and livability of those neighborhoods in a negative way. What is the justification for this, and, why the rush? I also urge you to extend the comment period for this project. I only discovered the project website recently and others I've talked to were unaware of it at all (the project has not been well advertised considering the large area of the City it impacts). Please plan for Portland's growth holistically and get it right the first time, otherwise we will all suffer in the future from today's mistakes.</p> <p>Thanks for your consideration.</p> <p>Retired Planner</p> <p>SE 44th Ave., Portland, OR 97215</p>
11/30	<p>Hi, I am against the currently proposed RIP plans. As a homeowner, a voter, and someone invested in maintaining my neighborhood, there are many reasons that I oppose the current plans. Most importantly, the RIP does not incorporate the amendments approved by City Council on December 7, 2016.</p> <ul style="list-style-type: none"> <li>• The RIP ignores City Council's amendment disallowing rezoning of narrow lots in R5 zones to R2.5.</li> <li>• The RIP ignores City Council's amendment to provide options for the housing opportunity overlay zone map.</li> <li>• The RIP ignores City Council's amendment allowing front-loaded garages on narrow lots.</li> </ul> <p>Furthermore, RIP violates the purpose of the zoning code, which is to provide stability and predictability to neighborhoods and the development process.</p> <ul style="list-style-type: none"> <li>• With the "housing opportunity overlay zone" the R5 zone becomes more dense than the existing R2 zone. The R2.5 zone becomes more dense than the R1 zone.</li> </ul>

	<ul style="list-style-type: none"> <li>• A potential triplex on every lot is a multi-family zone by definition and erases the purpose and intent of single-family zoning. The credibility of the code (along with civic leadership) is lost as is the expectation for stability when every home sale becomes a potential teardown.</li> </ul> <p>Please address these concerns in a manner that is pro-individuals, pro-neighborhoods, and does not continue to favor developers who are not invested in the good feeling and longevity of neighborhood preservation!</p> <p>Thank you,</p>
11/30	<p>Enclosed are my comments regarding the RIP draft</p> <p>Thanks.</p> <p>[From attachment:]</p> <p>Dear Planning and Staff,</p> <p>I live in inner eastside Portland, and like the current density. Its walkable, I know most of my long term neighbors that are homeowners or long term renters, and involved with a core group of neighborhood associations that are actively involved in the neighborhood. There is a sense of community.</p> <p>The RIP proposals are a little disturbing in that they seem to be circling back to a history in the Buckman neighborhood that shows development of apartment blocks and rental housing tore at the fabric of a neighborhood. I’m including two pages of the Buckman Neighborhood Plan that talks about the history – a history that we should learn from. <a href="https://www.portlandoregon.gov/bps/article/88656">https://www.portlandoregon.gov/bps/article/88656</a> (Many of the recommendations from 1991 within the plan are still pertinent to the neighborhood.)</p> <p>I’m most concerned about the vested interests of property owners and creating an actively engaged community. Buckman is a tough neighborhood to get involvement compared to our neighbors in Richmond and Sunnyside. We find those neighborhoods have active participation from home owners. In comparison, we see lots of turnover in our neighborhood group, and less active involvement, as the predominately renter population continues to turn thru. While the proposal may provide much needed housing, I question its ability to the right kind of housing and density for Portland.</p> <p>Thanks.</p> <p>SE 20th Avenue, Portland Oregon 97214</p> <p>[Attachment also included a scan of an article titled, “History of Zoning in Buckman.”]</p>
11/30	<p>hi,</p> <p>we are opposed to rip..</p> <p>we agree with [redacted by staff] comments</p>

See below my comments on the proposed residential infill zoning amendments.

#### Scale of new houses

- In the single family zone, an FAR greater than 0.5 is not appropriate. For FAR greater than 0.5, the result will be more like townhomes.
- Limiting the FAR will also prevent inappropriate heights.
- Fully below-grade basements could be exempted from FAR. Half-basements or walk-out basements need to count toward FAR.
- Allowing internal conversions to save historic housing is a good idea. Street-facing facades must be preserved in an internal conversion.
- Ensure that creation of ADU's increases supply of owner-occupied or long-term rental property, and does not go toward increasing short-term rentals.

#### Housing Opportunity Overlay

- Creating more housing that is affordable and accessible is important.
- The blanket approach toward densifying does not respect the immense work that went into the Comprehensive Plan and wipes out all of the nuances in long-range planning that support Portland built character.
- As currently defined, the overlay will only precipitate demolition of historic, economically viable housing to line pockets of investors.
- The overlay does not take into account infrastructure.
- The overlay basically destroys single family house zoning and does not acknowledge the fact that single family home ownership/rental is desirable within the city; not allowing it puts pressure on the Urban Growth Boundary by people who want this housing choice.
- The concept of town centers, walkability and livability is not reflected in this blanket densification; this is not good planning. Planning is not just about housing.

#### Narrow lots

- Narrow lots do not support the architectural character of Portland except in Old Town.
- Narrow lots will create a street wall of garage doors at pedestrian level, which is incompatible with current zoning code.

	<ul style="list-style-type: none"> <li>• Allowing narrow lot subdivision in R5 zones is UPZONING, which goes against City Council's recommendation and also contradicts the myriad zoning studies which took place during the Comprehensive Plan.</li> </ul> <p>Conflict of interest</p> <p>By allowing committee members on the RIP with self-serving interests, this zoning amendment project is benefitting those people at the expense of Portland's individual neighborhoods, historic character and livability.</p> <p>City Council's refusal to recognize this fact is inexcusable. In other cities and states, allowing committee participants who have a vested interest in the outcome of the committee recommendations is considered a crime.</p> <p>I am deeply disappointed in the direction Portland has taken.</p> <p>Sincerely,</p> <p>thx,</p> <p>ne 15 97212 and ne sumner 97211</p> <p>[signed by two individuals]</p>
11/30	<p>I understand it's impossible to please everyone. But what many residents/anti-demolitionists don't understand is how the RIP, in its current form, will encourage single detached houses rather than more housing units. It will price out all but the most affluent residents and create a brain-drain resulting from middle-income families fleeing the city. This isn't sustainable.</p> <p>Unless we want to become a city exclusive to high-income transplants living in single detached boxes, Portland must grow up. We can't afford to force out creatives and teachers and tradespeople and families. Our future vitality and success hinge on the true opportunity we create today.</p> <p>Attached you will find comments written by myself and [redacted by staff], published earlier this month in the Portland Tribune. Please enter these into the public record.</p> <p>Truly,</p> <p>[Link to referenced article that was included as an attachment:  <a href="http://pamplinmedia.com/pt/10-opinion/377933-262545-my-view-residential-infill-project-needs-changes">http://pamplinmedia.com/pt/10-opinion/377933-262545-my-view-residential-infill-project-needs-changes</a>]</p>
11/30	<p>Please disregard my previous version of this</p> <p>[From attachment:]</p> <p>Dear Portland Staff and Decision Makers:</p>

While I am a strong supporter of increasing housing options throughout the City and have specialized in building 3-8 unit infill projects, I cannot support the recommendations of the Residential Infill Project in their present form. On balance, rather than discouraging the demolition of existing affordable housing units, I believe that the proposal will increase teardowns randomly throughout most of the City.

The basic problem with the proposal is that, no matter what we call them, the proposal would allow tri-plexes on every single family lot in the overlay area and allow density greater than in the R2 zone. This is due to the fact that the 800 square foot allowance for ADU's, and the .5 FAR, would encourage redevelopment of sites with three 800 square foot two bedroom units instead of the imagined one large single family unit and two small accessory units. This gets to a project size that would be more comfortable for non-resident investors, rather than a home owner looking for a little extra income. Portland has a history of enacting zoning regulations with the hope of developing a newly desired housing type without consideration of what else might be developed under the new code. I fear the RIP is another case of this where we all imagine happy homeowners with their adu's only to get a bunch of poorly designed and built triplexes owned by people outside the neighborhood who care little about the residents around their investment property.

The following are my comments on specific aspects of the proposed code which need to be addressed to get the project closer to its goals. In order to keep this simple, I have not included every area where I have issues, and my silence should not be assumed to mean support.

Issue: Overlay Area

The area proposed for the overlay covers most, but not all, of the neighborhoods east of the Willamette River. However, areas in East Portland which have significant redevelopment potential are excluded, because there is fear that the infill tools could lead to displacement.

Recommendation: Reduce the area proposed for the overlay to a much more focused area or, after modifying the proposal to limit displacement, apply it to all of the City except for areas with environmental overlays.

Issue: Triplexes everywhere.

As staff has acknowledged, there is very little difference between a tri-plex, a duplex with one ADU or a single family house with two ADU's. With an FAR limit of .5, each 5000 square foot site could have 2500 square feet of building. With ADU's allowed to be up to 800 square feet, three virtually identical two bedroom apartments could be created.

Recommendation: Either reduce the maximum size for the ADU's to 500 square feet, or convert the code to an FAR only code where there is no limit on the number of units, only the total FAR and lot coverage.

Issue: incentives lacking for preservation.

While the project takes some steps towards neighborhood character, it does not do enough to encourage the preservation of existing houses.

	<p>Recommendation: allow the third unit only if an existing house is being preserved.</p> <p>Issue: FAR measurement</p> <p>The switch from regulating by unit number to FAR limitations is a significant step forward in moving towards a designed based code, and I support the change. However, as with any new code, it is hard to understand exactly how it is going to play out and how it will be gamed. The simpler the measurement system, the less likely it is to cause problems down the road</p> <p>Recommendation: count as FAR all areas that the building code considers habitable.</p> <p>Issue: Front yard Setbacks</p> <p>The RIP proposes to increase the front yard setbacks from 10' to 15', with a reduction if the neighboring houses are closer to the street. This is a step in the right direction, but in many areas of the City, especially the postwar developments in Southwest and East Portland were built with setbacks much greater than 15'</p> <p>Recommendation: make the setbacks more suited to their neighborhoods by either requiring that the setbacks match the neighboring house, or increasing the base setback to 20', or by setting different front yard setbacks for the different areas of the City.</p> <p>I hope these suggestions are helpful as you move forward with the project, and I look forward to continued participation in the process</p>
11/30	<p>Hello,</p> <p>Please see my attached testimony relating to the Residential Infill Project A Overlay to which I am opposed.</p> <p>Thank you,</p> <p>SW 31st Avenue, Portland, OR 97219</p> <p>[From attachment:]</p> <p>Re: Draft Residential Infill Project - Remove the A Overlay</p> <p>I support those provisions of the Residential Infill Project (RIP) that retain the character of the existing neighborhoods. Reducing the scale of new housing, measuring building heights from the lowest point of the lot, and averaging setbacks will allow infill to blend into the neighborhoods. These provisions will assure that Portland grows in a way that protects the great place that it is today.</p> <p>I oppose the RIP's A overlay that will affect 85,000 properties in the City. It adds capacity that is not needed. The Draft 2035 Comprehensive Plan clearly states that there is more than enough capacity under the current zoning for the growth that is projected through 2035. There is no need to add additional capacity for 85,000 units of unaffordable housing or 170,000 units of affordable housing. The RIP's A overlay adds these capacities by increasing</p>

	<p>the number of housing units allowed in the base zones. It will turn single-family zones into multifamily zones. I do not accept the flawed concept of the A overlay.</p> <p>If additional capacity is needed, then I support land-use planning best practices that require that base zones be changed in the Comprehensive Plan with community input. This approach would be consistent with Oregon's Land Use Goals. I urge you to remove the A overlay from the RIP.</p> <p>Please add this to the record.</p> <p>Thank you,</p> <p>SW 31st Avenue, Portland, OR 97219</p>
11/30	<p>I understand that today is the deadline for comments on the residential infill project. As a recent home-buyer in Montavilla, I am writing to support the re-legalization of "missing middle" housing throughout as much of the city as possible. I feel strongly that Portland's leadership should be doing everything in its power to avoid the displacement of longtime residents while increasing density in a way that promotes access to affordable housing.</p> <p>In my admittedly limited reading on the subject, it seems to me that the easiest way to do this is to provide developers the opportunity to build smaller and more affordable homes in desirable areas, and to discourage one-for-one demolitions (i.e., demolitions in which still-viable single family residences are replaced with newer/larger versions of the same) as much as possible. Although I understand that the current draft of the residential infill code lacks a fully viable "cottage cluster" zoning option (and I think it should, ideally, include that option), I certainly think that other "missing middle" housing should be encouraged in low-density residential areas.</p> <p>Thank You,</p>
11/30	<p>To Whom It May Concern:</p> <p>I am generally supportive of density, urbanism, and policies that will allow for the construction of additional homes and reduce our reliance on automobiles.</p> <p>The RiP Is a Good Start But Leaves the Ugly Status Quo In Place</p> <p>I think it is a travesty that such a large fraction of our housing stock is subject to exclusionary zoning, which is just another ugly vestige of slavery and racism in the U.S.</p> <p>I am generally supportive of the RIP proposal, as it moves in the right direction, but it is no substitute for the massive upzoning we should be doing in the inner neighborhoods.</p> <p>I very much appreciate the reduced envelope available to builders of single family homes, but I'm frustrated that there is no additional FAR available to people who would like to create additional density. In my mind, there should never be another single-family structure built within city limits.</p> <p>To Preserve Old Homes and Allow Density, Permit Any and All Internal Conversions that Do Not Expand The Building Envelope</p>

In order to promote the retention of historical homes, there should be no limit on internal conversions that do not expand the building envelope beyond the new limits. The giant four-squares and Victorians, which are often as big as the maligned newer construction should be allowed to hold as many families as want to live there.

With respect to the additional ADUs allowed under the draft language, I am strongly in support and would prefer a form based code that did not limit the number of partitions of each building.

#### Remove the Nonsensical Size Restrictions for Internal ADUs and Limit External ADUs Based on the Entire Primary Structure

I do think that with the allowance of two ADUs, the code language that limits the size of an ADU based on the "primary unit" does not make sense. The FARs, height limits, setbacks, and unit limits will protect whatever interest the city feels the neighbors have with respect to scale, massing, parking, and unit density. It is unnecessary and counterproductive to tell people how to divide the space.

As an example. Suppose a pre-existing 5,000 square foot R2.5 lot with a 1500 sq. ft. primary residence (1000' downstairs, 500' in the finished attic) and an external ADU built to the 800 sq. ft limit. Under the proposed regulations, if the owner of that parcel decided to convert the attic into an internal ADU, the primary residence would be reduced to 1000 sq. ft., and the ADU would be non-conforming. While a variance may be possible, it is hard to understand what policy is served by forcing the owner to jump through this hoop. Dividing the front house will create the extra density our policies demand and will not change the scale, massing, etc. of the buildings.

The regulations should be modified to allow an ADU to be built up to 800 sq. ft. or 75% of the floor area of the primary structure, not the primary dwelling unit. For internal ADUs, there should be no such limit on how the two units are divided.

#### Please Do Not Expand Front Setbacks

The finest examples of urban form around the world often have zero front setbacks. Many of the most beloved neighborhoods in Portland have setbacks smaller than the 15' proposal. It does not advance any of our goals to promote suburban-style front lawns or encourage large driveways. Requiring a large front setback threatens back-yard trees. Having houses further from the sidewalk reduces the "eyes on the street" effect and makes neighborhoods less walkable. The front setbacks proposed are a suburban policy that has no place in Portland.

#### Cottage Clusters

Please allow and encourage true cottage cluster developments, as well as other housing forms that were common before we implemented exclusionary zoning laws.

#### Parking

Please take this opportunity to remove all parking requirements in single family neighborhoods. There is no requirement that homeowners park in their required parking spots, and where curb-zone parking is free, they rarely do. In that way, minimum parking requirements actually decrease the parking available in the neighborhood as parking is excluded in front of the curb cut, and residents continue to store their vehicles on the street. Moreover, curb cuts reduce pedestrian safety and comfort and, thus, harm walkability.

#### Front Doors

Please take this opportunity to remove the silly restrictions on multiple front doors on homes. Many of our handsome historic homes were built as, or have been converted to multi-family units with two or more doors facing the street. Limiting the locations of entrances makes it harder to add homes and does not advance our stated goals.

#### Restrictions on Materials

Please remove the language limiting the aesthetic choices available to builders of ADUs. Any materials, styles, etc. that are acceptable for a primary residence should be available to be used on the ADU whether they match the primary residence or not.

#### Apply The Changes Citywide

No neighborhood should be excluded from these policies. It is inequitable to allow wealthier inner-neighborhood homeowners to build additional income-generating homes (with waived SDCs!) while excluding less-privileged, more-diverse homeowners in the outer neighborhoods from doing so.

Faithfully yours,

SE 36th Ave., Portland, OR 97202

11/30

Hi there,

As a lifelong Portland resident, I'd like to offer some feedback on the Residential Infill Project proposal. I'd think it could be improved in a few ways, in order to maximize affordability of new construction and prevent displacement.

First off, we should eliminate parking requirements to the greatest degree possible; they are huge, expensive barriers to duplexes, triplexes, and internal conversions. There are other policy tools, like parking districts, that can more efficiently manage neighborhood parking demands.

I also believe the "housing opportunity" areas should be expanded to the entire city. If it's an effective way to promote affordability, there's no reason wealthy neighborhoods should be excluded.

We also need to make sure sure that affordable housing incentives are workable. If they aren't significant enough it's possible they won't be used.

Thank you,

11/30	<p>Re: Draft Residential Infill Project - Remove the A Overlay</p> <p>I support those provisions of the Residential Infill Project (RIP) that retain the character of the existing neighborhoods. Reducing the scale of new housing, measuring building heights from the lowest point of the lot, and averaging setbacks will allow infill to blend into the neighborhoods. These provisions will assure that Portland grows in a way that protects the great place that it is today.</p> <p>I oppose the RIP's A overlay that will affect 85,000 properties in the City. It adds capacity that is not needed. The Draft 2035 Comprehensive Plan clearly states that there is more than enough capacity under the current zoning for the growth that is projected through 2035. There is no need to add additional capacity for 85,000 units of unaffordable housing or 170,000 units of affordable housing. The RIP's A overlay adds these capacities by increasing the number of housing units allowed in the base zones. It will turn single-family zones into multifamily zones. I do not accept the flawed concept of the A overlay.</p> <p>If additional capacity is needed, then I support land-use planning best practices that require that base zones be changed in the Comprehensive Plan with community input. This approach would be consistent with Oregon's Land Use Goals. I urge you to remove the A overlay from the RIP.</p> <p>Please add this to the record.</p> <p>Thank you,</p> <p>SW Hamilton Way, Portland Oregon 97221</p>
11/30	<p>Dear Mayor and Commissioners,</p> <p>I am writing to express my opposition to the proposed residential infill zoning amendments. I have lived in Buckman for the past 17 years, and my two young children now attend Buckman Elementary. I am deeply disturbed by many facets of the proposed amendments. I am concerned that the proposed amendments would destroy single family house zoning, and would create a type of densification that would damage the walkability and livability that many cherish in Buckman. I am also concerned that the narrow lots would create a wall of garage doors at pedestrian level, which is incompatible with current zoning code.</p> <p>Thank you - I hope that feedback from long-time residents of Buckman is taken into account on this important issue.</p> <p>Thank you, SE Pine St.</p>
11/30	<p>Dear Tom Berkowitz and RIP,</p> <p>Before moving any further with this one size fits all effort to increase density please look at how your existing infrastructure and current efforts to increase density are functioning.</p> <p>You already allow duplexes on every corner lot and accessory dwelling units on every lot, how successful has that been? It does not look like these options to increase density are</p>

	<p>being utilized. You should seek to make these existing efforts work before proceeding any farther with RIP.</p> <p>You must look at the existing infrastructure and whether that infrastructure can support any growth. Your plan must improve the existing infrastructure. Congestion on Portland's roads is increasing how does this project improve traffic? RIP must quantify the impacts of increasing density to the city and state infrastructure and then fund and build the infrastructure improvements necessary to support RIP.</p> <p>You must include TriMet in your project. An affordable, convenient and reliable public transportation system is required to allow any increase in density to work for average citizens.</p> <p>How much of the new housing being built in Portland is affordable? Buying a \$400,000 home, demolishing it and replacing it with an \$800,000 home is what I see happening now. How will RIP be different? RIP fails to insure housing affordability and will likely result in continued demolitions of affordable housing, and the rebuilding of unaffordable housing which will continue to drive up the cost of housing in Portland.</p> <p>RIP's one size fits all approach will ruin the unique character of Portland's neighborhoods which are clearly desirable to the growing population.</p> <p>RIP should not move forward until it is put to the citizens of Portland for a vote. The city clearly has its hands full right now and must engage all citizens in a vote of confidence in its efforts at this critical time in Portland's history. It is the citizens that make a city great, allow them to vote on RIP.</p> <p>Sincerely,</p> <p>Landscape Architect</p>
11/30	<p>Dear Bureau of Planning and Sustainability,</p> <p>This email is less of a detailed examination of the RIP plan than a response to the decision that the Inner SE has to be the focus of the plan.</p> <p>The Inner SE (together with Inner NE and N) has borne the brunt of often-unthinking development over the last few years and has experienced a subsequent decline in the livability of our neighborhoods - more people, more crowding, more parking problems, more ugly large buildings lining our streets, more crime. Why do we now have to be the center of residential infill as well? Other neighborhoods, such as those past 82nd Ave., have more space and could benefit from the city's attention.</p> <p>If the goal is to provide more housing close to downtown, then other neighborhoods are also close. If RIP is such a wonderful thing, why not try it in Irvington or Laurelhurst or Eastmoreland or the West Hills? Why are these neighborhoods allowed to retain their characters while ours is destroyed? Why are we the ones to be experimented on?</p> <p>This is an impassioned plea though I know that my voice and those of my neighbors will likely not be heard. The city listens more to developers than to residents and cares more</p>

	<p>about people who have not moved here (and may never move here) than it does about people who have lived here all or most of their lives. Nevertheless, I hope that the Bureau will reconsider.</p> <p>Beyond the details about lot size and setbacks, etc., I would urge the Bureau of Planning and Sustainability to consider spreading RIP around the city rather than once more imposing on Inner SE!</p> <p>Sincerely,</p>
11/30	<p>Dear Mayor and City Commissioners,</p> <p>Writing to express strong opposition to this scheme which erupted outside of the long-vetted Comp Plan Process.</p> <p>The stakeholder committee was full of developers who will profit from this illegal rezoning...which ironically excludes the West Hills where many of those in power and wealth live.</p> <p>This is wrong, illegal and will cost the City so much money in lawsuits. And will only increase exponentially housing costs as beautiful homes are demoed to make way for \$800,000 townhomes...just now 2-3 to a lot.</p> <p>We already 'have' a plan and process. It's called the Comprehensive Plan.</p> <p>Thank you,</p> <p>NE Portland</p>
11/30	<p>Thank you for your work on this issue, which I also believe is important to Portland.</p> <p>Please allow me to go on record as being AGAINST the RIP. I have been a resident of Portland for the past five years and am a board member of the Rose City Park Neighborhood Association. I've met and talked with scores of my neighbors, and while we agree that Portland needs more housing and in particular more affordable housing we also strongly agree that the RIP should not be approved as it has been outlined by the BPS. I am in full support of the arguments raised by the RCPNA, as sent to you by our chair, Tamara DeRidder.</p> <p>Here's one active voter's perception: I believe the RIP is a plan designed by developers for the benefit of developers and those involved in real estate. I believe it puts the concerns of people who haven't yet moved to Portland over the concerns of people who already live here and pay the taxes that provide your salaries. Want to kill the heart of a city? Turn its governance over to the developers.</p> <p>I talk to and listen to my neighbors, not only all of us who would be affected by the "a" overlay but also those of us who live in the arbitrarily-selected zones slated to be rezoned from R5 to R2.5. They're absolutely against the RIP. They realize that the main if not only reason properties lying on so-called "historically-zoned narrow lots" were chosen by the BPS was to aid the developers. They wonder who runs this city. They feel surprised and rushed</p>

	<p>and angry, and several have noted that it doesn't seem accidental that the extremely limited response time was scheduled over a busy holiday season. They feel betrayed by Portland. It warrants a second mention: my neighbors, the hard-working people who make Portland what it is, feel betrayed. They question the city's real vision and priorities. They wonder, for example, why a huge storage unit was allowed to be erected across the street from the 60th Avenue MAX station when it could have been an ideal spot for a housing unit, particularly for people who rely on TriMet to get to their jobs.</p> <p>Let me add that both my spouse and I vote and we contribute modestly to campaigns. We're politically active. We voted for Mayor Wheeler as well as for Commissioner Chloe Eudaly. We put our trust in you. We will respond positively to the politicians who oppose the RIP and give neighborhoods time to work out plans that will significantly affect them. We are strong believers that neighborhood associations are vital to the health and strength of a community. We're also aware that the "a" Overlay fails to adhere to the City Council's 2016 directive, and that the projected rezoning of properties from R5 to R2.5 reverses the City Council directive given the BPS last December.</p> <p>I know that a great deal of work has already gone into this plan. I applaud that work, but please let's take our time and get this right!</p> <p>Again, thank you for listening to my views.</p> <p>NE 60th Avenue, Portland, Oregon 97213</p> <p>[signed by two individuals]</p>
11/30	<p>Greetings Project Director Morgan Tracy</p> <p>Please remove the "A" overlay from the current version of the Residential Infill Project.</p> <p>I support those provisions of the Residential Infill Project (RIP) that retain the character of the existing neighborhoods. Reducing the scale of new housing, measuring building heights from the lowest point of the lot, and averaging setbacks will allow infill to blend into the neighborhoods. These provisions will assure that Portland grows in a way that protects the great place that it is today.</p> <p>I oppose the RIP's A overlay that will affect 85,000 properties in the City. It adds capacity that is not needed. The Draft 2035 Comprehensive Plan clearly states that there is more than enough capacity under the current zoning for the growth that is projected through 2035. There is no need to add additional capacity for 85,000 units of unaffordable housing or 170,000 units of affordable housing. The RIP's A overlay adds these capacities by increasing the number of housing units allowed in the base zones. It will turn single-family zones into multifamily zones. I do not accept the flawed concept of the A overlay.</p> <p>If additional capacity is needed, then I support land-use planning best practices that require that base zones be changed in the Comprehensive Plan with community input. This approach would be consistent with Oregon's Land Use Goals. I urge you to remove the A overlay from the RIP. Please add this to the record.</p>

	<p>Thank you,</p> <p>SW Moss St., Portland OR 97219</p>
11/30	<p>Dear Bureau of Planning and Sustainability</p> <p>Please find attached my comment and attachment to the proposed RIP. I would appreciate an acknowledgement of receipt.</p> <p>Best regards</p> <p>[From attachment:]</p> <p>RE: Comments on the Residential Infill Project (RIP)</p> <p><a href="https://www.portlandoregon.gov/bps/article/663023">https://www.portlandoregon.gov/bps/article/663023</a></p> <p>I have reviewed the Draft RIP and have a fundamental objection to its content and proposals made in it. It fails to consider in any substantive manner to range of impacts that the implementation of the policy will have on the City of Portland neighborhoods especially with regards to infrastructure, utilities, livability, environment, and other areas where adverse impacts on those neighborhoods will occur.</p> <p>The fact that Oregon has no environmental impact legislation that requires projects such as RIP to be evaluated against a specified set of criteria to determine where and how adverse (or positive) impacts will/may occur does not prevent the City of Portland from making such an evaluation. Instead we have a politically driven policy document which ignores basic tenets of fairness with regards to which parts of the City will bear the adverse impacts if the RIP were to be put in place as currently written.</p> <p>I am attaching a letter sent to your office by the President of the Laurelhurst Neighborhood Association. I have reviewed the letter and as a resident of the Laurelhurst neighborhood I fully agree with its content.</p> <p>Sincerely,</p>
11/30	<p>Please find my comments on RIP October 2017 draft attached.</p> <p>Thank you!</p> <p>SE 36th Ave., Portland, OR 97202</p> <p>[From attachment:]</p> <p>COMMENTS ON RESIDENTIAL INFILL PROJECT DISCUSSION DRAFT, OCTOBER 2017</p> <p>To Whom It May Concern:</p> <p>I am a mother of two young children, a nurse at OHSU, and a resident of the Richmond neighborhood.</p>

I am also co-Chair of the Richmond Neighborhood Association, but please note that the RNA has not yet heard community input on the current version of RIP, and my comments do not reflect the position of either the board or the neighborhood.

I came to know Portland first as a Reed College student from 2000 to 2004, and returned here in 2012, excited about the direction the city is moving.

The current RIP is a step in that direction, although not as large a step as I would like to see. I'm not going to address each point of the plan here, as I feel others have done so better. I just want to say that in general and in spite of pushback from many Portland residents, I believe that increasing density is not only necessary to slow the increase in housing costs and to provide places for the many people who want to be here to live, but it also will improve our lifestyles.

Although I recall them fondly in some ways, the days of driving all over the city with no traffic and ample parking, and buying a house for so much less than in other major coastal cities, are over. More people want to live in cities now, which I believe is a win for the environment, and more people want to live here, and resisting change will only allow housing prices to skyrocket and lead to more congestion on the roads.

The way I see it, we need a lot more housing, more of it needs to be suitable for families, and it needs to be connected to better public transportation options. Our neighborhoods also need to be more inclusive and diverse.

I also believe that density promotes better living and safety for an aging population and for people with disabilities. As my grandma aged, when she was no longer able to drive safely and she had a hard time with stairs, she found it much easier to live independently in a condo in a city, with an elevator and an accessible bus that stopped close by, than in a suburban retirement community with parking lots and wide roads. Additionally, my older son has a visual impairment that may prevent him from driving a car and possibly from bicycling safely, but he is extremely outgoing and will not want to be isolated at home. I believe a dense, walkable community with efficient, rapid public transportation will be the most livable option for him.

Furthermore, I believe density promotes safety. When I lived in Manhattan, I once mentioned to coworkers that I missed my solitary walks on the beach in the small town I had moved from. They all laughed because they couldn't imagine feeling safe in such an isolated setting. To them, safety was derived from having a lot of people around, and I believe that crime statistics support that feeling. I think people feel safe when they're alone on the street in an exclusive, wealthy community where everyone looks like them, or in a diverse setting when there are lots of people around and "eyes on the street," and I believe the latter is what we should be aiming for here.

I've lived in many different settings, including rural small towns in the Pacific Northwest; apartments in old buildings in San Francisco, Manhattan, and Paris; a large old home in Seattle's reconfigured for multiple housemates; and sprawling, car-centric San Diego, California and Stillwater, Oklahoma. In Portland, I chuckle when I see yard signs about welcoming refugees in neighborhoods that are seeking historic designation that would

effectively exclude anyone who is not wealthy (such as refugees). I see people composting, recycling, bringing their own bags, sometimes bicycling, and complaining about climate change and fires but being unwilling to accept the changes our city needs to make to get people out of their cars and to protect farmland and natural areas from being turned into suburbs. Based on my experiences with a variety of city planning approaches, and my goals of inclusivity and environmental responsibility that I believe I share with many residents of this city, as well as my personal interest in accessibility for my son and others who can't drive, and my interest in safety for myself and a sense of community with my neighbors, I celebrate our city planners' goal of increasing density (along with enhancements for walkability, safe bicycle routes, and more convenient public transportation).

I think some concessions have been made in RIP to appease residents who are upset by large, bulky buildings close to the sidewalk. Politically, I understand that, but I would love to see more commitment to the goal of a vibrant, affordable community.

For instance, I would love for the minimum front setback in R-5 and R-2.5 to remain at 10' or be reduced to 0' or somewhere in between. This promotes safety (eyes on the street, being able to talk to people on their front porches) and flexibility of structure placement, which might allow a tree to be saved in a backyard by shifting a house forward. I'm a lot more interested in preserving trees than in wasteful, environmentally harmful front lawns.

In terms of height and size restrictions, I appreciate the discouragement of oversized single-family homes, but I have no problem with large, bulky buildings that house more than one family. I hate to see older, modestly sized homes torn down and replaced with larger single-family homes, but if a multi-family unit or a cottage cluster or row houses or a house with one or two ADUs can replace it, I feel it's well worth the sacrifice of the older home. People need places to live, and it's better for the environment if every family doesn't have to take up a huge chunk of land, doesn't have to travel as far to work, can walk to the store, etc. I would support removing any restrictions that discourage adding housing, in general. Open up the possibilities of who can live in an ADU, how many people can live in a unit, and how big each unit can be. Remove parking requirements.

I support adding requirements and incentives that promote density, affordability, and inclusivity such as housing unit minimums when a lot is redeveloped, or allowing additional units if they meet affordability standards.

I would also like to see the city demand more of developers in terms of livability and access (such as pedestrian access through developments like Waverly Commons, community gathering spaces, shared open spaces and natural areas, etc.).

We are at a critical juncture in our city's development, and the decisions we make now will affect housing availability and livability of our city for decades to come. I look forward to living in an ever more inclusive, vibrant, accessible, and safe city as isolated single family homes are discouraged and density (with walkability and improved public transportation) is promoted.

Thank you very much to all involved for all the hard work that has gone into the RIP, and thank you for your attention to my comments.

	Sincerely,
11/30	<p>Please find my comments on RIP October 2017 draft attached.</p> <p>Thank you!</p> <p>SE 36th Ave., Portland, OR 97202</p> <p>[From attachment:]</p> <p>COMMENTS ON RESIDENTIAL INFILL PROJECT DISCUSSION DRAFT, OCTOBER 2017</p> <p>To Whom It May Concern:</p> <p>I am a mother of two young children, a nurse at OHSU, and a resident of the Richmond neighborhood.</p> <p>I am also co-Chair of the Richmond Neighborhood Association, but please note that the RNA has not yet heard community input on the current version of RIP, and my comments do not reflect the position of either the board or the neighborhood.</p> <p>I came to know Portland first as a Reed College student from 2000 to 2004, and returned here in 2012, excited about the direction the city is moving.</p> <p>The current RIP is a step in that direction, although not as large a step as I would like to see.</p> <p>I'm not going to address each point of the plan here, as I feel others have done so better. I just want to say that in general and in spite of pushback from many Portland residents, I believe that increasing density is not only necessary to slow the increase in housing costs and to provide places for the many people who want to be here to live, but it also will improve our lifestyles.</p> <p>Although I recall them fondly in some ways, the days of driving all over the city with no traffic and ample parking, and buying a house for so much less than in other major coastal cities, are over. More people want to live in cities now, which I believe is a win for the environment, and more people want to live here, and resisting change will only allow housing prices to skyrocket and lead to more congestion on the roads.</p> <p>The way I see it, we need a lot more housing, more of it needs to be suitable for families, and it needs to be connected to better public transportation options. Our neighborhoods also need to be more inclusive and diverse.</p> <p>I also believe that density promotes better living and safety for an aging population and for people with disabilities. As my grandma aged, when she was no longer able to drive safely and she had a hard time with stairs, she found it much easier to live independently in a condo in a city, with an elevator and an accessible bus that stopped close by, than in a suburban retirement community with parking lots and wide roads. Additionally, my older son has a visual impairment that may prevent him from driving a car and possibly from bicycling safely, but he is extremely outgoing and will not want to be isolated at home. I</p>

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	<p>big each unit can be. Remove parking requirements.</p> <p>I support adding requirements and incentives that promote density, affordability, and inclusivity such as housing unit minimums when a lot is redeveloped, or allowing additional units if they meet affordability standards.</p> <p>I would also like to see the city demand more of developers in terms of livability and access (such as pedestrian access through developments like Waverly Commons, community gathering spaces, shared open spaces and natural areas, etc.).</p> <p>We are at a critical juncture in our city’s development, and the decisions we make now will affect housing availability and livability of our city for decades to come. I look forward to living in an ever more inclusive, vibrant, accessible, and safe city as isolated single family homes are discouraged and density (with walkability and improved public transportation) is promoted.</p> <p>Thank you very much to all involved for all the hard work that has gone into the RIP, and thank you for your attention to my comments.</p> <p>Sincerely,</p> <p>SE 36th Ave., Portland, OR 97202</p>
11/30	<p>I support those provisions of the Residential Infill Project (RIP) that retain the character of the existing neighborhoods. Reducing the scale of new housing, measuring building heights from the lowest point of the lot, and averaging setbacks will allow infill to blend into the neighborhoods. These provisions will assure that Portland grows in a way that protects the great place that it is today</p> <p>I <u>oppose</u> the RIP's A overlay that will affect 85,000 properties in the City. It adds capacity that is not needed. The Draft 2035 Comprehensive Plan clearly states that there is more than enough capacity under the current zoning for the growth that is projected through 2035. There is no need to add additional capacity for 85,000 units of unaffordable housing or 170,000 units of affordable housing. The RIP's A overlay adds these capacities by increasing the number of housing units allowed in the base zones. The RIP's A overlay:</p> <ol style="list-style-type: none"> <li>1. Arbitrarily turns single-family zones into multifamily zones.</li> <li>2. Incrementally increases the supply of unaffordable housing units while destroying the character of long-established single-dwelling units.</li> <li>3. Will not increase affordability of housing.</li> <li>4. Fails to address swelling traffic issues resulting from an influx of residents.</li> <li>5. Fails to address the impact RIP would have on infrastructure such as schools, roads and sewage systems.</li> <li>6. Fails to address more nuanced zoning that adjusts based on the unique qualities of different lots and neighborhoods.</li> </ol>

	<p>7. Fails from a lack transparency and genuine public accommodation. I do not accept the flawed concept of the A overlay.</p> <p>I do not accept the flawed concept of the A overlay.</p> <p>I request that you eliminate the A Overlay in Multnomah and come up with a more neighborhood friendly way of locating density to accommodate growth.</p> <p>If additional capacity is needed, then I support land-use planning best practices that require that base zones be changed in the Comprehensive Plan with community input. This approach would be consistent with Oregon's Land Use Goals. I urge you to remove the A overlay from the RIP.</p> <p>Finally, I believe the current RIP recommendations are so incredibly far-reaching – affecting every person living and/or doing business in Portland – that the RIP recommendations should be placed on the ballot for a final-decision by the voters. Please add this to the record.</p> <p>Thank you, Sw Dolph Court, Portland, OR 97219</p>
11/30	<p>To Whom It May Concern,</p> <p>I am writing in against several provisions of the Residential Infill Project and in support of a recommendation regarding R2.5 zoning.</p> <p>Support:</p> <ol style="list-style-type: none"> <li>1. As a resident in an R2.5 zoned area, I strongly support decreasing the minimum lot width to 25 feet for land divisions. This is a great way to promote an increase in the supply of housing in areas that can accommodate increased density. It also support allowing property line adjustments creating a flag lot when retaining an existing home, as this also promotes the increase of supply of housing and adds an additional option for development in the area.</li> </ol> <p>Oppose:</p> <ol style="list-style-type: none"> <li>1. While I do support the building of duplexes and triplexes on larger lots, I do not support provisions that require attached housing after a demolition or any provision that makes it harder to build smaller ("Skinny" style) detached housing. Due to the demand for housing and need for increased supply it is short-sighted to eliminate options that would provide additional housing, especially in close-in neighborhoods.</li> <li>2. I oppose any limits to the size of new homes on a lot after a demolition. This effectively decreases the ability of a developer to meet market demand, and it effectively raises the cost of building in Portland (by decreasing profit) which decreases incentives for building in Portland, therefore limiting supply and putting upward pressure on prices.</li> </ol>
11/30	Attached are my comments on the proposed Residential Infill Project.

Thank you for your consideration of them.

S.E. Pine St., Portland, OR 97214

[From attachment:]

SUBJECT: Comments on Draft Residential Infill Project Revisions

Thank you for the opportunity to comment on the proposed revisions to the Residential Infill Project concept.

I support the goals of the RIP project but believe that the proposal, as currently written, will fail to reach these goals and could actually set back progress toward meeting them.

My specific concerns and recommendations:

- Incentivized Demolitions with No Guarantee of Affordable Replacements. As currently drafted, RIP seems more likely to incentivize the demolition of smaller, more affordable homes than to increase the city's supply of affordable housing. Recommendation: If the city is going to encourage the demolition of existing homes, it should at least require that the new replacement structures/units be affordable. Moreover, "affordability" should be defined as housing costs that are at or below 30% of one's income – not 80% of income, as proposed in RIP.
- Scattered vs. Focused Density: The proposal scatters density rather than focusing it. For this reason, RIP is unlikely to yield benefits that can result from smart, focused density – e.g., reduced auto dependence, better usage of transit, etc. Recommendations:
  - Review the proposed Housing Opportunity Overlay zone and provide more options for the HOOZ zone map, as called for in the amendment sponsored by Commissioner Amanda Fritz and approved by the City Council at its December 9, 2016 meeting.
  - Examine the focused-density approach taken by Arlington, County, Va. (where I used to live), which has:
    - produced 11.7 million square feet of new development (8.8 million of which is residential, with 7,511 affordable housing units) along the county's transit corridors;
    - dramatically reduced car trips (and their carbon emissions); and
    - preserved and reinvested in established residential neighborhoods. See [https://www.fairfaxcounty.gov/dpz/projects/reston/presentations/40\\_years\\_of\\_transit\\_oriented\\_development.pdf](https://www.fairfaxcounty.gov/dpz/projects/reston/presentations/40_years_of_transit_oriented_development.pdf). See also

<https://www.youtube.com/watch?v=nHQ-cpoox5A&feature=youtu.be> at 30 minutes into the video.

- Walkability, Pedestrian-Friendly Design, and Health. While the RIP proposal highlights its advancement of guiding principles (e.g., equity, economic prosperity, etc.) in the 2035 Comprehensive Plan, it glosses over other key goals in Comp Plan and Portland’s Climate Action Plan, such as:
  - “Encourag[ing] building and site design that promotes a healthy level of physical activity in daily life”
  - “Mak[ing] neighborhoods more walkable to reduce carbon emissions”
  - “Mak[ing] it easier to walk for typical errands to [cut] pollution and provide everyday opportunities for healthful stress reducing activities”

The RIP proposal seems most likely to degrade existing 20-minute neighborhoods while failing to create new ones. By contrast, the residential infill proposal of Tacoma, Wash. (see [http://cms.cityoftacoma.org/planning/Residential%20Infill%20Pilot%20Program/Tacoma%20Infill%20Pilot%20Program%20Handbook%20\(Nov2016\).pdf](http://cms.cityoftacoma.org/planning/Residential%20Infill%20Pilot%20Program/Tacoma%20Infill%20Pilot%20Program%20Handbook%20(Nov2016).pdf)) states:

- "Walkability and connectivity are core principles... Walkable neighborhoods promote health and wellness and create an accessible environment with more ways to engage citizens. Pedestrian-friendly design will be a key component of any proposed development...Parking, while very important, often detracts from good neighborhood design if it is too prominently located. Each proposal should consider ways to de-emphasize parking – every proposal must meet the parking requirements...in a manner that makes parking less visible and dominant, particularly from the public right-of-way."
- “Parking areas must be softened or screened with landscaping.” (p. 21)
- "Infill" is defined as "new development...sited on vacant or undeveloped land within an existing community..." (p. 1)
- Infill's site design is to be "responsive to and harmonious with neighborhood patterns and character." (p. 1)
- If a proposed project is in a historic district, the proposed design must be responsive to the...neighboring structures." (p. 23)

As noted below, nationally recognized public health experts have highlighted the importance of good design to a community’s walkability – and, in turn, to the health benefits that come from such physical exercise as walking:

- “Aesthetic factors...were identified among four categories of characteristics that encourage physical activity.” Source: *Urban Sprawl & Public Health*, by Howard

Frumkin, Lawrence Frank, and Richard Jackson, M.D. (Dr. Jackson narrated a 5-part series, Building Health Communities, that aired on public television)

- “People are more likely to get out and be active in places that are attractive and aesthetically appealing.” Source: Urban Sprawl and Public Health (noted above)
- “Streets that have bland architecture and that are dominated by long featureless horizons will not only be less interesting to the non-motorist but will also increase the perception of the distance that one needs to cover to reach a particular designation.” Source: Health and Community Design: The Impact of the Built Environment on Physical Activity, by Lawrence Frank et al at [http://www.oregon.gov/LCD/TGM/docs/cool\\_planning\\_handbook.pdf](http://www.oregon.gov/LCD/TGM/docs/cool_planning_handbook.pdf)

Recommendations:

- Review the RIP draft in light of its potential for degrading 20-minute, walkable neighborhoods that already exist; and
- Do more to protect the pedestrian-friendliness of existing neighborhoods and to create new, 20-minute neighborhoods
- Test Assumptions; Do a Pilot: If implemented as proposed, the RIP will have far-reaching, permanent effects on the city’s neighborhoods. Recommendation:
  - Remember a key lesson from urban renewal – i.e., well-intentioned programs can have disastrous and permanent consequences; and
  - Consider testing RIP’s assumptions through a pilot project (as Tacoma is doing with its RIP) before risking irreparable damage to existing neighborhoods while failing to achieve the desired affordable housing and other goals.

Thank you for your consideration of these comments.

S.E. Pine Street, Portland, Oregon 97214

11/30

I think the infill housing proposal has some good components but has others that need reconsideration.

1. A maximum house size of 2,500 SF is way too low for a 5,000 SF lot. There are all kinds of homes larger than that on 5,000 SF lots throughout the City, and in many areas, market demand and lot prices dictate at least having the flexibility to go to 3,000 SF. I'd say 3,500 SF to 4,000 SF is more realistic with 2,500 SF punitive and too low.
2. Rezone of historically narrow lots to R2.5 is a good idea.
3. Requiring attached housing when a house is demolished in R2.5 restricts the market.

	<p>4. Removing provisions that allow sub-standard lots to be built on in R5 is good, if that means through the lot confirmation process. I believe, density should be achieved through outright zoning not through lot confirmations of 100+ year old historic lots that are not consistent with zoning or existing housing.</p>
<p>11/30</p>	<p>Hi Berry, and Planners:</p> <p>I respectfully disagree with [redacted] positions below. If supported, this only creates inequity between the Investors immediate neighbors; where as, the Developers has means to hire a highly skilled Land Use Attorney, the immediate neighbors must go to GoFundMe to hire an attorney to process the State Historic Preservation application. June 16, 2016, the State Advisory Commission unanimously recommended their application on the Peacock Land Historic District move to Washington, D.C. The rest is history!</p> <p>At the time, when Sunnyside Neighborhood Association asked for Commissioner Dan Saltzman for assistance to stop the proposed resident infill cereal box between to 1925 circa English Cottages — his quick response, “Developer’s by-right” ... ! And yes, I remember when the former DRAC Chair told the SE Uplift Board of Directors how it was getting harder and harder to find cheap dirt to construct housing.</p> <p>Worth repeating, those selected to serve on the RIPSAC designed infill and quarter mile mapping policies that benefited most of them financially.</p> <p>Did City Council take into consideration the seven (7) members serving on the RIPSAC who addressed strong opposition in Council Chambers?</p> <p>Or did City Council take into consideration the Residential Infill Project — Participant Observation Report from [name redacted], PhD. Portland State University on Aging, 10/14/2017?</p> <p>Apparently, when the proposed [address redacted] SE Peacock Lane buyers lost their garden — they walked away. It may still be on the market. The mega house to the left is currently on the market. Did the Developer take time to attach holiday lights? Like you, I’m clueless.</p>



Once again when policy reads MAY vs SHALL — is often THAT loophole a the Developer “by-right” can falls back on. MAY does not REQUIRE INFILL DWELLING to “blend-in” with existing character of the block.



[name and address redacted] SE Washington Street, Portland OR 97214-3203  
[phone number redacted]

Unlike the newly constructed mega cereal box on Peacock Lane, this charming common-wall Duplex with three-bedrooms, one and 1/2 bath rental blends in with the character of the 1909 bungalows as well as 1924 Portland four-square houses. As did the college students parking their cars (six cars) on Washington Street. Never a problem, until the Eastside 101 opened 106 units on SE Cesar E Chavez Blvd, with 40 on-site parking spaces at \$125.00 monthly fee little wonder overflow parking by tenants park on my corner.

Kindly keep this common-wall duplex in mind, as it may be what Mayor Ted Wheeler had referenced when seeing skinny houses on narrow lots with ten-feet between units. Did I fail to mention, nothing grows on the land lacking sun light? Might I also suggest checking Portland Maps to see where 4-skinny houses that replaced a six-bedroom manner house at [redacted] SE Belmont Street. Sub Contractors who hired hourly labor did not provide work gloves or safety eyes glasses. To Laborers credit, the house was demolished into dumpsters — mill work, book case leaded windows, kitchen cabinetry, doors, roofing materials within

24-hours. Yes, about the time when SWNI Land Use neighborhood volunteers printed door hangers alerting immediate neighbors to dangers of asbestosis and lead paint flying 430 feet into the air.

In closing, Peacock Lane was but the tip of the RIPSAC infill iceberg. Final coffin nailed on Monday, June 3rd, when Home Builders' Association paid lobbyist 1000 Friends of Oregon were able to cut their 28 amendments from HB2007 (died on June 30th) and then stuffed those 28 amendments in SB 1051 inclusionary. Senate committee approved SB1051 "as presented" -- declared it an emergency; thereby, sending SB 1051 to the joint floor session bi-passing a debate. A point made by retired Lobbyist [redacted] on March 3rd,

Still at risk is the Publicly Owned School Property held in the commons for the common good, when the PPS Board of Directors declare a property surplus, sell it directly to a investor looking for cheap dirt! As was the case with the 1.31 open field facing SE Morrison between SE 14th and SE 13th. Learned, Commissioner Amanda Fritz lied to [redacted], [redacted] and yours truly, September 2016. She knew PPS entered into a second MOU May 20, 2014 -- blindsiding the CEID as well in that the Portland Public School's \$12 million appraisal on 1.31 acres open field facing SE Morrison Street between SE 14th and SE 12 Streets, had already expired 3-years prior. I was told it was currently worth \$7.5 million. As a matter of law, we Citizens must find a way to protect publicly owned school property held in the commons for the common good sacrosanct. Once open space is lost it is gone forever. Wake up Planners this issue is in your best interest to seriously think about the generations to come.

Lastly, I am counting the days until November 7, 2018 when those former PP&R city commissioners are up for re-election. Trust me, snow flakes will freeze in a hot place before I vote those former PP&R City Commissioners back into office. For what it is worth, my two cents on RIPSAC Developer's "by-right" to cut down back yard trees to make room for a detached ADU.

Respectfully,

Community Advocate

SE 38th Avenue, Portland, OR 97214-3203

[Included text from referenced post:]

[Name redacted], Richmond

Actually, the plan allows, on a single 5,000 s.f. lot, one more ADU. So, you're allowed one now (all over the city, for the last 10 years), and under this plan you'd be allowed to do a second one. One must be in the main house. So, 3 units instead of two (a 50% increase).

You could do a duplex, but you'd then only be allowed one ADU. Still a total of 3 units. That's up from the 2 you're allowed now, so a 50% increase, not tripling.

Unless you meet one of the special cases below, you can't build a duplex and 2 ADUS)

On a corner lot, you can right now do a duplex. It would now allow a triplex. Again, only a 50% increase.

That said, if you make all four units "Affordable" to 80% MFI, you can build a fourth unit. So, 4 instead of two. That's double, but it seems unlikely that a lot of those will happen. The same provision goes for saving an Historic house (must be on some official list). You get that same additional unit (no, not valid with any other coupons. One or the other). I think the extra unit for "all affordable" also applies to corner triplexes, but not the historic (unless it's an historic triplex?)

I hardly think this will "destroy" neighborhoods (or "lives"!), any more than the long-standing allowance for ADUs has "destroyed" them. Most people don't even notice those. And those that do live in them enjoy being in a close-in neighborhood, where they can use transit and walk to the store, without paying the price of a full house on a lot.

And, gosh, I'm not a powerful real estate developer, just a homeowner, and so far no-one has paid me to say anything. I just think it's the right thing to do, so more people will have places to live in neighborhoods where the infrastructure can easily support them, like inner Portland. But I also support extending this plan to the entire city, and not cutting out those east of 82nd.

Original post by [redacted] from Sunnyside (4 replies):

Powerful real estate and development interests, the majority on the RIP advisory committee, drives a machine that destroys affordable housing, and poops out tasteless boxes, with rents doubled. They...

11/30

Hi all,

This person Gerson, (see below). who I've never for some reason copied me if his notes to our Mayor and Honorable Commissioners so I thought I would respond.

Please include in the official record.

I must respectfully say that I do not support the Residential Infill Project for a number of reasons.

I am deeply troubled, with not only the process, and the heavy extent those who stand to profit from this massive rezoning of Portland's east side were actual, active crafters of this proposal, but also with the recommended product which I believe will increase unnecessary demolitions, devastate neighborhood character and livability and worst of all, create even more expensive and unaffordable housing.

Gerson says that in his opinion, all neighborhoods should be "restored" to this kind of zoning. The problem is, many of the neighborhoods now being collectively rezoned were built with the zoning, intention and design of exactly how they are today.

	<p>Also, many beautiful *close in* neighborhoods which one could argue should be made more accessible and have 'ample' room for lot and structure redivision (West Hills, NW Portland, etc.) are NOT included in this plan?</p> <p>Why is this?</p> <p>Surely a hill can not be a rational reason to not rezone all the West Side too? Doesn't everyone deserve access to the views, good schools and west side amenities of the West Hills and environs?</p> <p>Why only the East side?</p> <p>Could it the designers of this proposal know that it would be DOA when faced with the money and political clout of the west side?</p> <p>This "plan" is more like a "scheme" which will enriched developers and raise housing prices even higher per square foot.</p> <p>It is being foisted on a mostly ignorant public as a means to "create more housing options".</p> <p>My neighborhood, Buckman already has very high density and many housing options. Yet it was 'after' the new apartment buildings went in on the transit corridors that rents really started to go up.</p> <p>Yes...the creation of those new developments and their new astronomical rents caused long-term landlords to start to try to match what they saw others charging.</p> <p>The RIP will simply make that now happen with all the houses...as a flipper can buy one, demolish it, and build 2-3 in its stead. Charging \$700-900,000 *each*. Not to mention the short term rental boon that will flourish for big profits.</p> <p>I strongly oppose this plan. This isn't "Portland for Everyone". It's "Portland Developers Use a Committee Set Up To Address their Demolitions and Excesses to Line Their Pockets Via a Rigged Process"</p> <p>Or for short: "West Side Still Rules...and has big houses, big lots, and tons of street parking...available to only.them"</p> <p>This plan stinks with corruption and manipulation. Stick with the Comp Plan which is where we were all told these kinds of decisions were to be made.</p> <p>SE 17<sup>th</sup>, Portland, OR 97214</p>
11/30	<p>Hi there, I support the current discussion draft of the Residential Infill project, but I agree with Portland for Everyone that it needs the following modifications:</p> <ul style="list-style-type: none"> <li>• Allow the “housing opportunity” provisions in all areas of the city to improve equity outcomes and encourage the creation of additional walking scale neighborhoods.</li> </ul>

	<ul style="list-style-type: none"> <li>• Make the affordable housing incentives workable to increase the likelihood that they will be utilized.</li> <li>• Allow internal conversion of existing houses into multiple units in all areas, and provide additional incentives for housing preservation.</li> <li>• Create a true cottage cluster code that will encourage the development of smaller, more affordable homes.</li> <li>• Rezone all historically narrow lots from R5 to R2.5, with design improvements, to share land costs and provide housing options that more families can afford.</li> <li>• Support a healthy urban tree canopy by designing flexible code provisions that incentivize saving trees and creating less impervious surface.</li> </ul> <p>We need more housing, period, and I feel that by following the bullet points above Portland will be able to offer more housing that's affordable to more people.</p> <p>Sincerely,</p> <p>NE Broadway, Portland OR 97213</p>
11/30	<p>To Whom It May Concern,</p> <p>I am generally in favor of all the proposed changes but I feel that the proposal doesn't go far enough. It would be much stronger if it would:</p> <ul style="list-style-type: none"> <li>• Eliminate minimum parking requirements to preserve trees and remove barriers to duplexes, triplexes, and internal conversion.</li> <li>• Allow the "housing opportunity" provisions in all areas of the city to improve equity outcomes and encourage the creation of additional walking scale neighborhoods.</li> <li>• Make the affordable housing incentives workable to increase the likelihood that they will be utilized.</li> <li>• Allow internal conversion of existing houses into multiple units in all areas, and provide additional incentives for housing preservation.</li> <li>• Create a true cottage cluster code that will encourage the development of smaller, more affordable homes.</li> </ul> <p>I realize you've probably seen similar bullet points from others, but I agree with all of them.</p> <p>I am a long-time resident of Ladd's Addition and live in a four-plex that is setup as a condominium. I've lived there for the last 8 years and before that I lived in a converted tri-plex house in Ladd's Addition.</p>

	<p>I would not have been able to live in the neighborhood without these housing choices and would love to see many others have the same opportunity.</p> <p>Sincerely,</p> <p>SE Hemlock Ave.</p>
11/30	<p>Comments on the RIP report</p> <p>NE 34th Ave., Portland Oregon 97211</p> <p>[From attachment:]</p> <p>To the Portland Bureau of Planning and Sustainability</p> <p>Comments on the Residential Infill Project Staff Reports</p> <p>Page 3, Guiding Principles, 1. Equity Principle stated as "increasing the amount of affordable housing," What type? Certainly not single family detached housing. You should put a number on the income required for a family to buy a house. Otherwise, numbers are all over the place. I found a 2015 story in Oregonian/OregonLive by Mike Francis saying median income in Multnomah County was \$54k which indicated a house purchase price of up to \$285k. There aren't any new houses for anywhere near that. It's hard to take the report seriously if it starts with patent falsehood. I realize numbers change, but you are disingenuous to speak of affordability as a goal. Maybe a low cost rental, but that's not what the report is about.</p> <p>Page 3, Guiding Principles, 2. "Support a low-carbon economy..." A study by Preservation Green Lab of the national Trust for Historic Preservation says building reuse almost always yields fewer environmental impacts than new construction when comparing buildings of similar size and functionality. Energy efficient housing can take between 10 and 80 years to overcome, through efficient operations, the negative climate change impacts that were created during the construction process.</p> <p>Page 3, Guiding Principles 3. Human Health. I agree with avoidance of negative health impacts up until the last phrase where you're going to "reduce financial stress and increase potential for active mobility through reduced automobile use." I am 76 years old and arthritic. I live in a highly walkable neighborhood and take public transportation most of the time. Nonetheless I drive occasionally when it's necessary. I find it ludicrous to say reducing automobile use would increase the potential for active mobility. I won't be less mobile if you take my car away.</p> <p>Page 4, Guiding Principles 4, Environmental Health. I favor increasing open space. Mandating smaller houses is a good start. A citywide FAR of .5 would be fine. I think setbacks are a false issue. If the house is smaller a shorter setback should mean a larger back yard. I favor uniform setbacks when there is a pattern. New houses in my neighborhood have almost no yard at all, front or back. This is not environmentally healthy.</p>

Page 4, Guiding Principles 4, Resilience. I'm all for retrofitting older houses to make them more fire and earthquake resistant. It is not necessary to bulldoze old houses and put their stored carbon in a dump. New houses may be more energy efficient, but it can take decades of savings to make up for the carbon loss from demolition and construction.

Page 5, Missing Middle. This is sophistic. We're supposed to get dewy eyed at the plight of the young couple who can't afford a house in an existing neighborhood so we should put them in a smaller house or multifamily unit. Nonsense. New construction is invariably unaffordable by people making whatever percentage of median income is labeled "affordable". In April 2016, the broadcaster KOIN estimated it takes about \$60k/yr to live comfortably in Portland while the median household income is approximately \$53k. The only hope for the young couple is to find an older house that comes closer to the spread. It is grossly unrealistic to say new construction on demolished land is cheaper.

I submit there's a middle ground between demolition and new construction on one hand and densifying and updating old properties. I have no problem with ADUs for long term--not airbnb--housing or converting old single family houses into multifamily. I've seen this a lot of this in the southeast.

Page 6, Online Questionnaire. Other respondents to the questionnaire said what I did, that affordability and neighborhood compatibility were top concerns. The RIP recommendations that tell us what we're going to do with all this land we have after we demolished old houses make a bad condition worse.

Page 11, The report says Portland will need 123k more units to house the influx of people and that about 25k will be in single family neighborhoods. Fine. But will they be single family houses? The study also notes that average number of people per household is declining. So why are new houses larger and have more bedrooms and bathrooms than the homes they replace? In my neighborhood, Concordia, I've seen almost no new houses smaller than three bedrooms and 2.5 baths.

I don't agree with the proposal to exclude attics with low ceilings and basements from house size limits. I believe if any part of an attic is eight feet floor to ceiling and if a basement is habitable both should be counted as floor space. The report is needlessly confusing as it is.

I believe FAR should be capped at .5. Makes it easy for a layman to understand. I would agree with the recommendation for an accessory structure that would be for long term housing.

Page 12. Encourage two story new construction. I believe that's already the norm for new construction. I also believe there's lots of one story houses that could be refurbished. Don't start with the notion that they must all be demolished.

I agree with the height recommendation.

Page 15, Setbacks. One size should not be made to fit all. Defining setbacks should consider back yard play and recreation space too.

Page 17, Improve building design. I favor no more than seven steps from the sidewalk except where the site is already built up. Consider old people have difficulty climbing steps.

Page 18, Housing Opportunity. As I've noted, "affordable housing production" is an oxymoron. There is no affordable single family construction except maybe cheap apartments. And they cost \$300k per unit to build.

I'm all for age friendly housing. Be mindful of steps to climb.

Page 20, 'a' overlay zone. The comprehensive plan should be fairly easy to read and grasp. It should tell people what they can and cannot do. Replacing the 'a' overlay zone with another 'a' overlay zone makes things less clear. A person going to Portland Maps or the tax office website should not be tripped up by the designation of 'a' overlay zone. The old zone is greatly different from the new zone. Reading an earlier version of the code is needlessly confusing. Call the new overlay zone something else.

Page 23, 7. Provide incentives for affordable housing. Staff recommended allowing a bonus unit for people making "up to 80% of median family income." How much is that? This is straight from Humpty Dumpty telling Alice "it means just what I choose it to mean--neither more or less." I realize numbers change with each census, but this ranks with "sustainable", "organic" and "healthy". A recent story in the New York Times spoke of top tier apartments available for "those who earn anywhere from 51 to 165 percent of the median income for the metropolitan area or from \$43,000 to upward of \$141,000 for a family of three." That may not be precisely accurate and subject to revision in a few years, but the Staff seems indifferent to people's comprehension.

Page 24, internal conversions. The commentary seems gratuitously negative. I believe that converting a house into two three units may be uniquely challenging and costly. But it is worth it.

Page 2, cluster development. I agree with the concept, but there needs to be a minimum lot size (recommend >10k sf). A recently announced development, Going Street Commons, is a prime example of some of the recommended features. The site is 1.3 acres. Eleven units are estimated to be available for \$675k to \$750k.

Page 28, Narrow Lots. Skinny houses get bad press. Some of the recommendations seem to be motivated by prejudice. Skinny houses look different, at least when they're first built. People get used to them. Trees grow around them. I believe the anti-skinny suggestions such as no garages facing the street, are overbroad and vindictive. I think consideration should be given to people who own 7500 sf tax lots of which there is a 25' strip on one side of their house shouldn't have their lot zoned so as to be virtually worthless.

## CONCLUSION

The report is a cynical amalgam of misinterpretation and half truth that will please developers and harm minorities and the elderly. It makes me glad I am old, in good health and fairly rich.

11/30	<p>Thanks, Todd; I appreciate the thorough explanation. I still don't quite understand the combination of factors, though.</p> <p>There are a LOT of renters in these skinny houses in North Portland, as you note, the largest concentration of them in the entire city. We will definitely be displaced when they fall into disrepair and can't be replaced unless an owner/developer also owns the lot next door-- and, since they were cheaply constructed and mostly 10-15 years ago, that will be happening in the next 10-20 years for sure. Mostly the rented ones are purchased by a single investor, then rented to families or groups of unrelated adults because the long skinny character actually provides a decent amount of privacy, and with the garages and driveways as they are, provide parking for multiple adults. Currently they rent in the \$1500-2000 range (up from \$1000-1300 10 years ago), and that's hard to beat when it's divided by 2 or 3 and you don't have to live in an apartment with no storage.</p> <p>Why, then, not add an A overlay to allow missing middle development to be added in our neighborhood? Many of the folks-- myself included-- who rent skinny houses (and have to share them with roommmates, not fun in your 40's) would be perfectly accommodated by garden apartments, duplexes/triplexes, cottage clusters, and the like. I fail to understand-- I guess is my biggest question-- how you decided that removing the proposed A overlay from big portions of North Portland protects renters.</p> <p>I love my neighborhood and I want to stay. But as a low income single adult who depends on a car for work, I'm kinda screwed by this proposal, at least as I understand it. Thanks for the dialogue.</p>
11/30	<p>I just want to say that you need to revisit the overlay and the rezoning of much of Roseway from R5 to R2.5. Please PLEASE do not REQUIRE that 2 units be built when new construction is built. If you have actually visited this neighborhood you will see it actually does not have the services, infrastructure or transportation to double or triple its population and in addition you will make it horribly ugly. Just because we have a couple of bus lines and a Safeway doesn't mean we are a bustling location that can handle more units. Also, when new skinny houses are built, they are almost never affordable - you will encourage new construction that will actually force out longtime residents as opposed to make opportunities for those who can't afford the latest newly built construction. So you are not going to be solving any problems, you will only be creating new ones.</p> <p>Many of our streets are too narrow for two cars to drive by each other. Some of our streets are not even paved. We are also quite far from downtown and jobs, and not near a Max line at all. So what you need to do is find ways of creating smaller multi-unit buildings in much more inner NE Portland that are actually close to businesses and Max lines and then you may not have to worry about including parking. Some of the newer construction around here sticks out like sore thumbs and looks absolutely horrible. Please don't allow construction that we're all going to regret. And I don't see how adding ADUs is going to help with housing - many people don't want renters living in their backyard, so they will just Air B n B them or not rent them out.</p> <p>Also I just want to say that there has not been enough information about this and I bet a lot of people who could be affected by it don't even know about it - you shouldn't be allowed to change the zoning on my lot without my say-so. You don't own it, I DO.</p>

	<p>It's clear to me that you are doing this for the benefit of real estate developers and that's about it. The rest of us will not benefit at all, and you will solve no problems but create new ones.</p>
<p>11/30</p>	<p>The form was broken, so I am quickly trying to compose this before the deadline:</p> <p><i>Limit the size of houses while maintaining flexibility (R7, R5 and R2.5 zones).</i></p> <p>I am for smaller house size! I live in an old Victorian, less than 1400 sq feet with a large yard. I worry what happens to all the green space around the traditional homes in our neighborhoods when they are torn down and huge houses are built that loom over the remaining homes and have no green space left. Also, 2 smaller homes will allow moderate income folks to enter into home ownership.</p> <p><i>Improve building design (R10, R7, R5 and R2.5 zones).</i></p> <p style="padding-left: 40px;">These seem to be about buildings being more to human scale and I like that, especially limiting number of stairs to entrance.</p> <p><i>Create a new Additional Housing Opportunity overlay zone – the new ‘a’ overlay zone.</i></p> <ul style="list-style-type: none"> <li>• <i>Allow the following housing types in the new ‘a’ overlay if one of the units is “visitable”:</i> <ul style="list-style-type: none"> <li>• <i>House with two accessory dwelling units (ADUs), one attached and one detached</i></li> <li>• <i>Duplex</i></li> <li>• <i>Duplex with one detached ADU</i></li> <li>• <i>Triplex on corner lots</i></li> </ul> </li> <li>• <i>Require the following visitability features for one unit: a low- or no-step entry, wider halls and doors, and living space and bathroom on the ground floor.</i></li> <li>• <i>Allow an additional 0.15 FAR for triplexes on corner lots.</i></li> </ul> <p>This overlay is proposed for my street, I believe. I am okay with it, providing green space is preserved. Duplex, Triplex okay as long as they aren't such huge buildings as we have seen recently. Although, it would be better to see 3 families accommodated in those large homes rather than just one.</p> <p>I think the "visitability features" are especially important for allowing diverse ages and physical abilities in our neighborhoods!</p> <p><i>Provide incentives for affordable housing and historic preservation (new ‘a’ overlay zone).</i> Historic preservation is super important to me. Keep Portland Portland! Keep the human scale of our neighborhoods! Preserve trees and green space!!</p>

	<p><i>Encourage more cottage cluster development (all single-dwelling zones).</i></p> <p>A bunch of smaller homes surrounding a central courtyard is so appealing. All the beautiful neighborhoods, e.g. Ladds, Northwest, have attached, small units around courtyards. Attached or detached, it is a nice design and accommodates more households on a lot. What about converting older homes into condos? Preserving the historic exteriors and dividing the houses into duplexes and triplexes?</p> <p><i>Make improvements to the R2.5 zone.</i></p> <p><i>Create rules for small flag lots that restrict the size of the new house to 1,000 square feet and the height to 20 feet, and require exterior design elements.</i></p> <p>Yes, this is to me a very good implementation of infilling. Small is beautiful!</p> <p><i>Please take a moment to tell us a little about yourself.</i></p> <p>I own my home. I have lived in Portland a little over 4 years. I am 45-59, female.</p> <p>Thank you for letting me share my views!</p>
11/30	<p>Please, please reconsider this ill-advised proposal. In it's present form it will forever negatively alter the single family neighborhoods of the east side. All of this in the name of greater density standards which do not apply to areas beyond 82nd St. or westside neighborhoods. Additionally, the declared goal of creating affordable house with RIP is absurd. At today's land values, developers have no incentive to build such homes. Ironically, RIP will instead incentivize them to pull-down perfectly serviceable and affordable smaller homes in many neighborhoods.</p> <p>Again, please defeat this unfair and reckless proposal.</p> <p>Yours sincerely,</p> <p>NE Glisan St., Portland, OR 97213</p>
11/30	<p>Dear Sir or Madame,</p> <p>I write formally to express my strong opposition to the plan put forth called the Residential Infill Project.</p> <p>In my opinion this is not a plan...but a scheme that seeks to create wholesale, widespread redevelopment and enrichment opportunities of much of the inner east side of Portland (protecting the west side, of course), which will serve developers, investors, short term rentals (Air BNB), fee generating agencies (BDS), the City coffers, but do <i>*little*</i> to serve the citizens of this town....and certainly nothing to create affordability.</p> <p>This plan...supported by those who simply want more areas to rip up, tear down and make money uses misleading populist rhetoric and argument which fools those who haven't lived here long that this is a "solution" to Portland's housing issues.</p>

	<p>But let's look at the facts. Under this plan, one could sell their house for \$4-500,000 and have it replaced with at least two-three \$900,000 units with an income generating Air BNB "granny" unit where the back yard tree used to live.</p> <p>And please don't tell me that won't happen.</p> <p>Lifelong Portlander. Six decades plus. Lived in all parts of the city. This plan undoes the careful work and process of the Comp Plan and is a totally give away to the developers.</p> <p>And really...why, if this is such a "good and *equitable* plan, were the close in, beautiful, historic West Hills totally left out??!!</p> <p>Doesn't "everyone" deserve to live there too.....or only on the "East" side?</p> <p>Please do not support this. It will only further divide the city, create expensive and protracted litigation, and ruin beautiful, stable, healthy neighborhoods many will no longer be able to live in.</p> <p>Thank you,</p> <p>SE 17th Avenue, Portland, OR 97214</p>
11/30	<p>Please, reconsider this especially the density change. The City is mucking with what makes our city wonderful and liveable!</p> <p>I understand there is a (alleged) demand. And that growth has benefits especially in tax dollars gained. BUT we must consider the unintended consequences of splintering our city and further affecting the wonderful nature of our neighborhoods. Do we really want to be like Seattle which has increased its density and done nothing to improve housing prices. The two are not necessarily connected in ways we would like.</p> <p>Please don't pass this. Already our traffic is terrible and many elements of our wonderful place are being negatively affected. We can hold firm to what we love and not give into to improvident efforts to "develop" many of which do not have our best interests as citizens at heart.</p> <p>Thank you.</p> <p>NE 20th Portland 97212</p>
11/30	<p>To implement such a broad-sweeping plan without anticipating unintended consequences seems rash. Please consider a test neighborhood for this policy, one that would welcome densification and increased infrastructure.</p> <p>Sincerely, SE Alder St., Portland, OR 97214</p>
11/30	<p>I would like to offer my support for the current Residential Infill Discussion Draft, and in particular the Housing Opportunity component. I support the relatively broad 'a' overlay zone that is being proposed for several reasons. One is that a broad region of inclusion is necessary to meet housing affordability goals. Second is that the growth of the city depends</p>

	<p>on a uniform increase in density rather than heavily concentrated density in just a few pockets. A broader pattern will support more a effective public transportation system, for instance. In addition more even growth will better utilize our existing schools, parks, hospitals, etc. I support all the areas that have been selected for the 'a' overlay zone and the reasoning behind their selection.</p> <p>SE 33rd Place, Portland OR 97202</p>
11/30	<p>Dear Sir, Dear Madam,</p> <p>I am writing to comment on the Residential Infill Project. I have heard a lot of discussion of this in my neighborhood, and most of my neighbors don't like most of the ideas that are being proposed.</p> <p>I've looked at the Project Summary, and I have to say that it lacks something quite important: a vision of what you are aiming to accomplish. What will our neighborhoods look like after five years? After ten years? After twenty years?</p> <p>Will there still be something cohesive about the place we have chosen to live our lives, or will the feeling of neighborhood be destroyed by the changes that are being proposed? The lack of a clear statement and/or depiction of your goal makes us feel as if you don't care what the resulting neighborhoods look like. Is that actually the case? Is your only goal to have greater density, and who cares about the neighborhoods that made Portland such a wonderful place? We care very much about whether our neighborhood is changed into something completely different from the one in which we are invested. We would appreciate it if you could explain and show us what you think the result will be, and why it is worth it to change the place we've chosen to live.</p> <p>Sincerely,</p>
11/30	<p>Dear BPS staffers and reviewers:</p> <p>Thanks for the opportunity to comment on the staff draft of the Residential Infill Project. These comments are submitted for the Architectural Heritage Center's Advocacy Committee by Steve Dotterer, the Committee Chair. If you have questions, please contact him at the above email or 503-233-0023.</p> <p>In general, The AHC Advocacy Committee supports the intended direction of the comments submitted by the United Neighbors for Reform.</p> <p>We also believe that Bigger is not cheaper. Claiming that affordability is not an objective of this project at a time when the City has declared an housing affordability crisis and while the city is experiencing a period of very rapid housing construction makes the bureau and the city seem very uncoordinated. Housing affordability should be a primary objective of this project.</p> <p>Specific items that we want to call your attention to include:</p>

1. Support for elements that incentivize keeping the existing house, its façade and front yard. This includes the allowance of an additional (second) ADU when the existing house is maintained.
2. Keep the size limit of 2500 sq. ft. in R5 zone (0.5 FAR). We believe that all of the main house habitable space (including basements that can be used) should be included in this FAR.
3. The visitability requirements are a desirable addition to this project for new construction. Given the difficulty of meeting all the current building code requirements when subdividing/remodeling existing houses, we recommend that the requirement be applied sparingly to existing buildings. If the BPS-requested changes to state building codes are improved, a different requirement might be reasonable.
4. Use of the new units: We recognize that monitoring ownership and use of the new units and ADU's is difficult. But given the affordability objectives of the city, they can not be avoided. The goal is to increase the supply of long term rental units, especially those at affordable rents. This will require a level of monitoring that has been avoided in the past. It also means a more nuanced approach to incentives like fee waivers: Don't give SDC waivers for AirBnB units, do give them for affordable units.
5. HOOZ broadly applied vs. pilot studies and market analysis: We agree with the comments from UNR about the importance of pilot studies and the impact of applying the zone revisions on a citywide basis without having a clear understanding of their market impact. The City's experience with the Gateway zoning changes (which seem to have increased the asking price for land without speeding up construction over the last ten years) and the application of the R2.5 zone to large areas adjacent to main streets (without any significant increase in housing construction) suggest that a more nuanced approach is needed. At a minimum, it would be logical to consider code approaches that recognize the differences in the three residential landscapes of Portland- the hills, the streetcar neighborhoods and the post war areas. The market in each is different and the zoning code approach should reflect that.
6. The section 33.405.70 language dealing with historic resource reviews appears well intentioned and it is important to deal with the interim period between the adoption of RIP and the expected later adoption of new Historic Resources Code. However, we believe that it needs significant additional work before the report goes to the Planning and Sustainability Commission. Even among the group of PCHR members who reviewed the draft (many of whom have become true code experts) there was significant confusion about the meaning and intent of the proposed language. We invite BPS staff working on this section of the RIP to come to a PCHR meeting for further discussion and clarification.

Thanks again for the opportunity to comment.

11/30

Dear Sirs and Madam,

	<p>I believe that the RIP is a poorly conceived plan that was rammed through City Council by a mayor who was on his way out. At the time that it happened it seemed like a last minute end of the year thing.</p> <p>My first objection is that it doesn't remedy the demolitions that are taking place across the cities inner neighborhoods. While I am not against all demolitions I believe that what is replacing the demolished housing is not appropriate for the neighborhood and is less affordable. A torn down house is replaced by a house costing 3x as much. How does this solve the housing crisis?</p> <p>Allowing this density increase in neighborhoods that are already the densest in the city really decreases the livability and destabilizes the neighborhoods. Instead of knowing your neighbors the inner neighborhoods become bedroom communities with little input from the renters. Livability should also be included in planning.</p> <p>The exclusion of the West Hills is a real problem. A city planner gave the excuse that earthquake and wildfires were the reason that it was excluded. As a civil engineer I can attest that earthquakes could flatten SE just as readily as the West Hills. The same is true with fire just look at the San Francisco fire of the early 1900. The reason this area is being excluded is because of the wealth of this neighborhood and the fact that the residence have the ability to drag the city into court or have undue influence in our political system.</p> <p>Finally I believe that the advisory committee was made up of a lot of individuals who put there own best interests ahead of the future of this city. Shame on Portland planning and politicians for letting this happen.</p> <p>Thank you,</p> <p>SE Oak Street, Portland, OR 97214</p>
11/30	<p>Commissioner Eudaly,,</p> <p>I am a life long resident of the City of Portland and now live in the home I grew up in. I believe that the City has a fiduciary commitment to the land owners of the City to protect the character of the neighborhoods for the citizens who have invested their lives there. Attached are my feelings on this issue.</p> <p>Respectfully</p>
11/30	<p>..but not Buckman. We have carried the density and housing mix ball for quite a long awhile already.</p>
11/30	<p>Hey there,</p> <p>I'm writing to simultaneously express my support for the discussion draft as compared to the status quo and to express my opinion that the proposed changes can and should go much further.</p> <p>I support all changes suggested by the Portland for Everyone coalition. I also strongly support the following suggested changes:</p>

	<ul style="list-style-type: none"> <li>• Eliminate or expand 'a' overlay. The overlay should be based on where we expect future amenities, not just where certain amenities exist today. Future building will induce many amenities, making many exclusions in the current map rather silly.</li> <li>• For example, NE Prescott east of Cully Blvd has standard bus service today, and the lots north of it are excluded. If and when some lots just off Rosa Parks densify under these changes, TriMet is likely to upgrade bus service to meet demand.</li> <li>• NE 42nd at Fernhill Park has a frequent-service bus and a park, but the lots east of 42nd are excluded. Silly.</li> <li>• Bottom line: we should be allowing density anywhere that we *could* have high-frequency transit, not just where it exists today.</li> <li>• Waive on-site parking requirements within 1/4 mile of planned transit corridors. This is consistent with the City's long-term plans and goals, unlike the current and proposed requirements.</li> <li>• Improve incentives for affordable housing. Proposed 100% requirement is too high; we need incentives that could allow a for-profit developer to build an affordable unit.</li> </ul> <p>Thanks for your work.</p> <p>Best,</p>
11/30	<p>To whom it may concern:</p> <p>We support those provisions of the Residential Infill Project (RIP) that retain the character of the existing neighborhoods. Reducing the scale of new housing, measuring building heights from the lowest point of the lot, and averaging setbacks will allow infill to blend into the neighborhoods. These provisions will assure that Portland grows in a way that protects the great place that it is today while also retaining the charm of older neighborhoods.</p> <p>We oppose the RIP's A overlay that will affect 85,000 properties in the City. The Draft 2035 Comprehensive Plan clearly states that there is more than enough capacity under the current zoning for the growth that is projected through 2035. There does not appear to be sufficient analysis to support the need for adding additional capacity for 85,000 units of unaffordable housing or 170,000 units of affordable housing. The RIP's A overlay adds these capacities by increasing the number of housing units allowed in the base zones. It will turn single-family zones into multifamily zones. We are not happy with the concept of the A overlay and are concerned that it will stress the already deficient infrastructure of our area. Many of the streets in Multnomah Village are in severe need of repair with pot-holes that could practically swallow a car, no sidewalks and very little response from the city to fix these problems.</p>

	<p>If additional capacity is needed, then we support land-use planning that requires that base zones be changed in the Comprehensive Plan with community input. This approach would be consistent with Oregon's Land Use Goals. We urge you to remove the A overlay from the RIP.</p> <p>Please add this to the record.</p> <p>Thank you,</p> <p>Multnomah Neighborhood [signed by 2 individuals]</p>
11/30	<p>I live at [redacted] SE 47th Avenue in Portland - between SE Hawthorne and SE Division.</p> <p>I see that Portland Heights and Healy Heights and Council Crest and abutting neighborhoods are completely and totally EXCLUDED from this project. Why is this area exempt? Once again, the wealthy are favored, and the middle class has to bear the brunt of development. Soon, that area of SW Portland will become a wealthy enclave much like a gated community.</p> <p>Do not tell me that it is because of the "hills." I lived at 1516 SW Davenport Street for 21 years, from 1990 to 2011. I grew up on SW Carl Place in Healy Heights and attended Ainsworth and Lincoln schools. I KNOW the neighborhood -- there are plenty of buildable spaces, and plenty of them are flat or gently sloping. Even the sloping lots are buildable with new techniques.</p> <p>I had a 50' x 100' lot on Davenport. The back portion was a perfect spot for an "infill" home under all your criteria. Why not rezone the lots in that area from R10 (or higher) to R5 or R2.5, as you have done with my lot in SE Portland?</p> <p>My parents' home on Carl Place was 100' by 100'. There was plenty of buildable space on that lot also. Why not rezone that neighborhood to R5 or R2.5?</p> <p>Exempting all of Portland Heights is SHAMEFUL. It is blatant favoritism of the well-to-do and discrimination against lower and middle class homeowners in favor of the rich. You are encouraging teardowns and ruining my beautiful SE neighborhood of historic bungalows, but apparently SW Portland is exempt from teardowns. Except a teardown of one historic home for a single ugly huge McMansion.</p> <p>Whatever criteria you used – hills, earthquake, landslide, etc – served to PERFECTLY exclude most of SW Portland. Which means you needed to change your criteria, not that the outcome is correct. SW Portland is the MOST white area of town and always has been (except for the urban renewal area South of downtown which was destroyed in the 1950s). Any effort to "address inequity in our community" has to include all of SW Portland.</p> <p>Until you include the ENTIRE city in your infill project to accommodate predicted population growth, the whole Project is a joke.</p> <p>I'd be happy to discuss this with any of your planners. However, the last planner I met with at one of your "meet and greets" did not know where Portland Heights is.</p>
11/30	<p>I support the Residential Infill Project, but believe it should go further and allow but not require parking for primary residences. Aside from increase the development cost of houses, parking minimums also do very little to increase the parking supply.</p>

	<p>Per the zoning code, a driveway needs to be at least 9' wide. The wings either side of the driveway are typically 3' each. The total curb length is therefore 15', or 3/4 of the length of a standard 20' parallel parking stall. Driveways also have to be separated 5' from each other, which means in a duplex 35' of curb space will be unavailable for parking.</p> <p>By requiring on-site parking we're therefore doing very little (if anything) to increase the net amount of parking available. The parking that is created is only available to the owner of the house, who's unlikely to be using it all day long.</p> <p>The curb cuts also negatively impact the number of trees planted in the ROW. In addition to the fact that trees can't be planted in the driveway, they also have to be kept at least 3' away from the edge of the throat. It's telling to see how lovely the streetscape of Ladds Addition is, where there aren't driveways on the main streets, as compared with some of the modern skinny houses on narrow lots where the driveways take up the entire frontage.</p> <p>I think much of the opposition to new infill housing comes from the very ugly streetscapes that are an unintentional effect of our zoning code. By removing parking minimums we could again build the kind of streetscapes that Portlanders love.</p> <p>Regards,</p> <p>NW 16th Ave.</p>
11/30	<p>Dear Bureau of Planning and Sustainability:</p> <p>Please accept my comments regarding the Residential Infill Program proposals.</p> <p>While I am supportive of certain individual elements of the proposal (detailed below), and I agree that Portland does need to allow for additional density in carefully selected areas, I am strongly opposed to one of the key elements of the plan: the proposed "Housing Opportunity Overlay Zone." The Overlay zone is an untested, wildly overreaching, wholesale rezoning of the majority of Portland's east side and part of the west side that lacks an appropriate public input process. The "overlay zone" is being proposed without ANY legitimate study or modeling of its potential effects on housing affordability, renter and homeowner displacement, and home demolition. There is very good reason to believe that the Overlay Zone would result in dramatically increased home prices, increased displacement, and the demolition of many more viable, less expensive houses. BPS and the city should instead test the Overlay Zone proposal on a small area of the city (one or two neighborhoods) in a pilot project to determine the impacts first.</p> <p>The best way to add density to existing neighborhoods while maintaining affordability is to allow new units to be created through ADUs and through internal divisions of existing, viable houses--not through demolition of existing homes. ADUs and internal divisions are the only two types of added units that should be permitted on a blanket basis under an "overlay zone." I urge BPS to remove the allowance for new construction of duplexes and triplexes in the blanket overlay zone.</p>

Moreover, the RIP directly violates several decisions taken by the city council on December 7, 2016: It ignores City Council's amendment disallowing rezoning of narrow lots in R5 zones to R2. It also ignores City Council's amendment to provide several map options for the housing opportunity overlay zone--instead, there is only one map. Finally, it ignores council's directive not to allow rezoning of historically narrow lots in R5 zones to R2.5. These glaring violations of the council's decisions should be sufficient reason to stop this process until a revised RIP proposal can be prepared that meets the council's explicit directives.

I am also very concerned that the RIP proposal is deceptive regarding the maximum permitted building size. One of the key reasons for the creation of the RIPSAC was the "mega-homes" replacing small, affordable houses in Portland. The RIP plan claims that the maximum building size will be 2,500 square feet. However "low ceiling attics" and basements (which need only be 4 feet below grade), including finished basements with above-grade windows, would not be included when measuring the square footage of a new house. Additional square footage would be allowed for accessory dwelling units (ADUs), garages, and sheds. Because of these additional allowances, the maximum house described in RIP could actually be 3,250 square feet--plus the basement. Basements must be included in the calculation of square footage for the RIP plan.

I also want to call particular attention to the impact of the RIP proposal on housing affordability for renters, especially low- and middle-income renters. Housing affordability is a top priority for the city, which has declared a housing emergency. However, despite rhetoric claiming that the RIP is a solution to Portland's housing affordability problems, the RIP will in fact severely worsen housing affordability. Specifically, on pages 44-48 of the RIP proposal, city planners acknowledge that displacement of renters is a potential outcome of the upzoning and "opportunity" overlay. Many renters already have been displaced from the proposed "housing opportunity" overlay, and far more currently affordable rental homes will be demolished under RIP, because builders will be able to reap far greater profits (and thus pay higher land prices) by tearing down affordable rental homes once the right to build a duplex (or triplex on corners) is granted. Under RIP, demolitions will likely spread increasingly to neighborhoods with smaller, cheaper houses, causing even greater displacement pressure on their residents, especially renters. The city must commission a comprehensive, independent study to assess the impacts on housing affordability and renters of the RIP proposals before they come to city council for a final vote.

I would also like to comment on a few specific elements of the RIP proposal:

1. Items that I support:

- A maximum of 6 stairs from the street to the front entrance of a house.
- Measuring building height from the lowest point 5 feet from a house.
- Allowing internal conversions of homes to create additional units.
- Mandating that for a bonus unit to be granted, all units in the house must be permanently affordable for 60% of MFI.

	<p>2. Items that I oppose:</p> <ul style="list-style-type: none"> <li>• Not including basements in the calculation of square footage for the purposes of FAR.</li> <li>• Allowing a 35 foot height limit in R2.5 zones. This should be a maximum of 30 feet.</li> <li>• Allowing a 30 foot height limit in R5 zones. This should be a maximum of 25 feet.</li> <li>• Rezoning any historically narrow lots in R5 zones to R2.5. This expressly violates the direction of city council in December 2016.</li> </ul> <p>Thank you very much for the opportunity to comment on this proposal.</p> <p>Sincerely,</p> <p>NE 14th Ave, Portland</p>
11/30	<p>As a homeowner looking to upgrade to a slightly larger home in Portland, but unable to afford the giant new homes being developed, I strongly support making it easier to build more duplexes, triplexes, divided historic homes and cottage plan buildings. I urge you not to allow Nimbyism to prevent Portland from building the "missing middle" type of housing. Portland needs less giant single family houses and fewer garages and more housing people can afford. Please help make that happen.</p> <p>Thanks,</p>
11/30	<p>Subject: Comments on the proposed residential infill zoning project</p> <p>To: residential.infill@portlandoregon.gov</p> <p>As a longtime resident of the Hosford Abernethy neighborhood and board member of HAND (Hosford Abernethy Neighborhood District Association) I support the comments in the letter HAND has submitted regarding the residential infill project.</p> <p>I feel very fortunate to be able to live in the neighborhood and would like to see more economic and cultural diversity returning to the neighborhood. I sincerely hope that as part of this project the city is seeking the input of unbiased economists who can provide a realistic assessment about whether this project will bring affordability and housing opportunity to all Portland residents. There is little assurance in this proposal that the housing created will be affordable to rent or own.</p> <p>It is critical that with these zoning changes the city also establish equity goals, monitor the impacts of the policy, track the housing units, and build in measures to correct course if the goals are not being met.</p> <p>Thank you for this opportunity to provide input.</p>

	SE Orange Ave., Portland, OR 97214
11/30	<p>Please find attached the response of several neighbors, mostly in Buckman neighborhood, that do not support the RIP and associated overlay. We all agree the city is going in the completely wrong direction!</p> <p>Further, we feel the city has its mind made up and this is worthless input. Please don't dismiss us, or the countless other letters against this project. We ARE Portland! We helped make Portland what it is today, but don't want to be a part of what it is becoming!</p> <p>[From attachment (signed by 7 individuals):]</p> <p>November 30, 2017</p> <p>Bureau of Planning and Sustainability,</p> <p>We feel certain you are being bombarded with reasons that the RIP and "A" overlay are objectionable to many of the long-time residents of inner SE Portland, and from the east side of Portland in general. You can include us in that list as well. We feel this plan will destroy the Portland for the citizens you are trying to convince that hordes of people desire to move to. We also feel this proposal has not gotten the city-wide attention it needs despite your public meetings. This conversation is too important to the home owners and citizens of Portland to try and push through without more discussion or a public vote.</p> <p>The few benefits of this plan are lost in the push towards density. Our first objection is the "A" overlay seems to be predominantly on the east side of the Willamette River with very little of this impact happening on the west side of the river.</p> <p>Most of us signers below, having lived in Buckman Neighborhood for many years, should point out that the RIP proposal calls for expanding the new 'A' overlay based on proximity to amenities, such as community centers, parks, schools, and multiple bus lines, yet even the City of Portland acknowledges the Buckman neighborhood has been identified as being park deficient. As a matter of fact, we recently LOST a park with the St. Francis unaffordable housing complex. Note also that Buckman neighborhood has no community center and there isn't one that is easily accessible.</p> <p>In the Buckman Neighborhoos, we feel the RIP and "A" overlay works to undo all that the residents have worked hard to do over the past 30 years to make Buckman Neighborhood desirable. One of the main criteria for a stable community is stability of its residents and this proposal will not only increase the ratio of renters to home owners, it will deteriorate the stock of housing that already exists for families and eventually the schools and neighborhood will suffer. Here are the objectives of the neighborhood plan that the RIP and "A" overlay blatantly ignores and violates:</p> <ul style="list-style-type: none"> <li>• Policy 1, Objective 1.1 of the plan was to maintain and improve the historic character of Buckman neighborhood.</li> <li>• Policy 1, Objective 1.4 of the plan was to encourage restoring and existing properties rather than razing and replacing them.</li> </ul>

- The BNP points out the predominance of multifamily and rental housing causes a high resident turnover rate. The neighborhood encourages the trend toward greater owner-occupancy and discourages further conversion of the small stock of single-family residence. The neighborhood must also encourage restoration and new housing construction on vacant land to be of enduring quality, and to be compatible with the neighborhood's architecture.
- Policy 2, Objective 2.2: Protect, renovate, and maintain single family homes, and increase the percentage of single-family homes.
- Policy 2, Objective 2.4: Preserve residential areas that are predominantly in single-family use and of single-family building style to 1) retain structures of historic character and 2) maintain the limited single-family housing stock of the neighborhood.
- Policy 2 Objective 2.9 calls for Encouraging zoning that will improve housing opportunities in commercial districts.
- Policy 3, Objective 3.4: Discourage the demolition of buildings that have historic or aesthetic value.

Overall, the only thing we find that this RIP with the "A" overlay does is to potentially increase the density of the areas of Portland that can least benefit from it. This may increase density somewhat, but it will NOT lower prices. It WILL increase traffic, force families and elderly to move out, affect our schools, and deteriorate the livability of the east side of Portland.

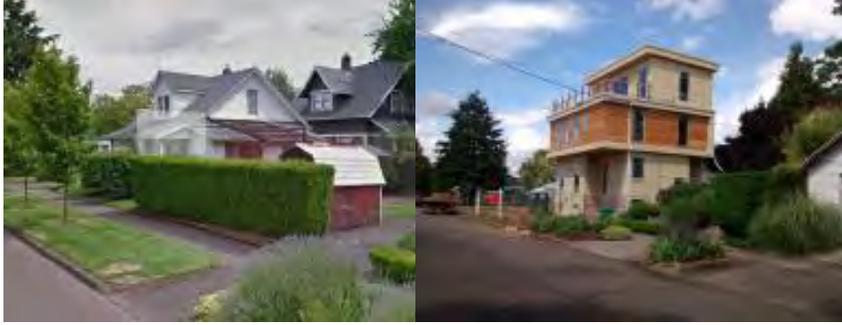
The RIP and "A" overlay is an assault on single-family homes throughout the city at a time when many families are feeling an anti-family sentiment from our city government with all the construction of studio and one-bedroom apartments lacking any family options. The size limitations of the RIP and "A" overlay will force families to the suburbs and make the existing larger homes even more unaffordable and/or they will be destroyed. It will impact our schools, our sense of community, and our traffic. All this while we are overwrought with homeless people that need assistance and this proposal will do absolutely nothing for them.

On a city wide application, the "A" overlay is simply a non-transparent way of changing the zoning. The overlay obscures what the city is doing: changing the zoning! Additionally, your approach to making homes smaller and increasing density will not in any way increase affordable housing and will result in less homeownership and more instability in the neighborhoods.

Within our circle of friends and neighbors there is a growing swell of long-time residents saying we need to get out. Portland is quickly moving away from the city we fell in love with and invested our energy to make it what it is today. The RIP and "A" overlay are one more creation that decimates the character of this city that is now seemingly focused on the people who may move to this city and not the residents that are here.

	<p>We request the City of Portland and the Bureau of Sustainability do more to take care of the people that are already here rather than spend money and time figuring out what to do about people that may want to move here. Let's focus more on planning to decrease the overwhelming homeless situation, plan for AFFORDABLE housing, plan for more parks and community centers, plan better schools and increased traffic flow, and commit to crime reduction. We have plenty to do here to improve livability for the citizens that are already here. Let's really focus on being the city that works NOW!</p>
<p>11/30</p>	<p>Most of our family objection are in regard to the proposed Overlay of the Residential Infill Proposal. The issues of Housing Opportunity Overlay and Growth Rezoning of Lots should be reconsidered first, before the specificity of house scale within those zones is determined.</p> <p>Ergo, the overall plan:</p> <ul style="list-style-type: none"> <li>• Fails to test concepts before blanketing the Eastside with unproven policies.</li> <li>• Bypassed the extensive vetting of the Comp Plan and amounts to rezoning - and breaking public trust - without sufficient public input.</li> <li>• Disproportionately impacts the inner Eastside when the outer Eastside is better-suited - and in fact, in need of - development with vast, empty tracts that would benefit from redevelopment and the jobs, services, safety, transportation improvements and amenities that would follow.</li> <li>• The proposed growth overlay is not sustainable. The inner Eastside infrastructure and traffic patterns can not accommodate this level of growth.</li> <li>• It eliminates single family neighborhoods with no regard for existing residents.</li> <li>• It displaces owners of modest homes and others of modest means who may be pressured out of apartments, houses and current neighborhoods by rising prices, rents and property taxes. In effect, it could have the opposite of its intended equity goals because it marginalizes those who are already here and are stakeholders in supporting City services.</li> <li>• The above pressures on current taxpayers, encourage demographic turnover that would destabilize the City's economic tax base.</li> <li>• RIP reduces green space and tree canopies, destroys the character of neighborhoods and the storied charm of the City.</li> <li>• RIP does nothing to serve families with children who need stable communities, homes with yards, gardens and shade; in fact, it relies on self-fulfilling prophecies that fewer families will move here. If you don't have neighborhoods that meet family needs, then, no, they will not come.</li> <li>• RIP does not represent good planning. It is short-sighted homage to developers.</li> </ul>

	SE 57th Ave., 97215 [signed by a family]
11/30	<p>Hello,</p> <p>Please find the attached document submitted as part of the official public comment phase of the Residential Infill Project.</p> <p>Thanks,</p> <p>[From attachment:]</p> <p>Dear Julie and Morgan,</p> <p>I have devoted many hours researching the proposed Residential Infill Project (RIP) taking advantage of BPS resources online, at in-person open houses, and during phone calls with City staff members. Because this plan has far-reaching effects on the future livability of Portland, it's vital that we get this right. As the plan currently stands, I do not support it – particularly the proposed “a” overlay zone. Despite having some possible positive impacts (e.g., attempting to avoid “McMansions” by placing restrictions on scale), I believe this proposal fails to meet its originally intended goals, one of which to have redevelopments be “better integrated with existing homes.” (Morgan Tracy, Oct. 2016). I argue this plan focuses too much on simply increasing the number and types of homes to appease buyers moving to Portland and not enough on maintaining character and affordability which have made Portland such an attractive place for new and existing residents.</p> <p>In recent years as the housing market has rebounded, development in Portland has been short-sighted and often driven by investors aiming to maximize profits (think N Williams/N Vancouver). In single family neighborhoods, many of the new infill homes built recently are not affordable, overshadow existing homes, and contain design standards that do not foster inter-generational appreciation. The example below illustrates an increasingly common phenomenon in Portland and highlights the need for infill regulation. Here, a modestly sized (1200-1500 sq ft) and affordable (&lt;\$300k) single family home was demolished and replaced with two larger (2000-2500 sq ft) and expensive (~\$800k each) “modern” style homes. The policies contained within the proposed RIP seem to only encourage this practice. I do not believe this style of development is conducive for the long-term viability of Portland.</p> <p>Figure 1. An increasingly common sight in Portland where a small home was demolished (photo on left), the property was subdivided (allowed under current zoning), and replaced with two three story modern homes (photo on right; second unit not yet visible). Development occurred in a bungalow/craftsman-dominated single family neighborhood in N Portland.</p>



I strongly urge BPS to discover ways to accommodate new residents without sacrificing Portland's integrity and character. I contend the RIP will ultimately degrade the city's livability. Here are four key ways I contend the RIP falls short:

- 1) Reduces the amount of neighborhood green space. Maintaining green spaces and canopy cover in single family neighborhoods is not just aesthetically pleasing, it has a variety of environmental and health benefits. For example, it increases wildlife habitat and improves the filtration of stormwater, thereby enhancing the water quality of adjacent waterbodies and easing the burden on water treatment and stormwater infrastructure.

While development doesn't always have to occur at the expense of the environment, this plan does not ensure that necessary steps will be taken to preserve green space and canopy. Increasing the number of housing structures on each lot will reduce the already limited amount of green space throughout single family neighborhoods.

Green space will be reduced either by: 1) replacing a smaller house with a larger house (up to 2500 sq ft), 2) building two new houses on an R2.5 lot where only one house previously existed, or 3) adding ADUs adjacent to existing homes (as many as two allowed under plan under the affordable "bonus unit" clause). Given this plan encourages more ADUs and mandates that when a single home is demolished on an R2.5 lot it be replaced with two homes, all three of these scenarios are inevitable. Further, neighborhoods will experience more residents without a commensurate increase in public parks. Reducing green space seems in direct conflict with the City's larger goals and vision.

- 2) Fails to adequately address housing affordability. While I understand the scope of the RIP can only be so broad, I believe this is a missed opportunity to address Portland's housing affordability crisis. I appreciate the incentives offered to developments containing affordable units, but any gains in housing affordability will likely be offset by a reduction in green space. According to PortlandMaps.com, the majority of infill redevelopments sold at considerably higher prices than the homes they supplanted. I don't see how infill redevelopment improves affordability (especially one-for-one redevelopment), when the cost of these new homes is out of reach for the average low to middle income resident. We cannot simply build our way out of this crisis and I have yet to see any evidence that increasing development

has lowered the cost of housing in Portland. Instead, I would like to see concrete steps adopted in this plan that proactively address housing affordability.

- 3) Encourages demolitions of existing homes. The RIP was developed initially, in part, in response to residents' concerns over the increased pace of demolitions. Without question, this plan will exacerbate demolitions city-wide. First time home buyers cannot compete with investors wishing to redevelop properties. Developers have and will continue under this plan to purchase properties that can be redeveloped for maximum profit. Further, demolitions can take place with very few, if any, environmental protections which increases rates of toxic exposure for adjacent residents. This plan will encourage demolitions, and, as such, I strongly support that it not move forward without major revisions and stricter environmental regulations.
- 4) Lacks design criteria for new homes. The rapid acceleration of new homes in single family neighborhoods has yielded a variety of new development styles. The "modern" style of development seen below has cropped up in neighborhoods everywhere. These houses are controversial because they don't fit in with the existing homes. This plan does not regulate design criteria in neighborhoods without historic designation. The clash of styles can create tensions among neighbors. I recommend including design criteria for redevelopments to maintain the character of neighborhoods.

Figure 2. A scene in inner NE Portland illustrating the stark contrast between historical and current development styles. Design criteria in the RIP is a necessity to preserve neighborhood character.



Finally, the proposed "a" overlay zone would allow excessive development in single family neighborhoods and would essentially eradicate the one house per lot system currently in place. I, for one, do not wish to see duplexes and triplexes in single family homes. This approach is headed in the entirely wrong direction and grows Portland in unsustainable ways at the expense of the single family neighborhood. Please strike the "a" overlay zone from this proposal.

In summary, the assumptions in this proposal are untested, and I am strongly opposed to the RIP in its current form. I urge the City to carefully consider all public opinion before moving in a direction that could exacerbate the character and livability of Portland.

Thank you for receiving my input.

11/30

Dear Tracy,

My name is Steve Knudsen and I respectfully submit the following comments on the Residential Infill Project Discussion Draft. I have been a continuous resident of the Buckman neighborhood since I purchased my existing home in January of 1981. Since 1981 I married and my wife and I have raised three boys, all of which attended Portland Public Schools (Buckman, Winterhaven and Cleveland). Over the past 36 years living in Portland's Buckman neighborhood I have fully restored my 1904 home and have spent much time working on behalf of the city and neighborhood (including a number of years as Land Use Chair of the Neighborhood Assn., Community Garden Manager, etc.). I was also active in the Development of the Buckman Neighborhood Plan; a plan which appears to have been largely if not completely ignored during Phase I of this "infill" process.

While I could provide many specific comments on the proposed Code changes and proposed "a" Overlay today, I suspect most would be repetitive of the specific comments you will receive from others. Therefore, since the comments at this stage are designed to assist you in developing a "Proposed Draft" for PSC consideration, I will tailor my comments to address a few major issues which will hopefully help you develop an improved proposal for PSC consideration.

First and foremost, the discussion draft suffers from material deficiencies as a planning document. There is limited to no discussion of policies and objectives and the draft contains no sense of what the end result is supposed to be from an urban planning standpoint. How will you evaluate whether the initiative is successful near term and long-term? The draft appears to have been written by developers, and not written by trained urban planning professionals. Examples of this include pictures that provide exaggerated and misleading perspective to create the illusion of "McMansions", and misleading impressions of the size of a "typical older home". There is no such thing as a typical older home in Portland.

Comment: Taken as a whole, the recommendations in the Discussion Draft reflect a lack of appreciation for the housing diversity across neighborhoods and the housing diversity within neighborhoods.

Discussion: The Discussion Draft proposes a "one size fits all" up-zoning of all but a small percentage of land in existing single family zones. One could surmise that a hidden objective of the plan is to eliminate single family homeownership altogether (in all but the West Hills) by:

1. restricting existing home remodeling that adds more than token square footage,
2. making every tract currently in single family ownership more valuable to developers as multifamily housing than as single family
3. Limiting any new single family home in the city to 2,500 sq. ft. or less.
4. Prohibiting single family development on all existing R5 lots with 5,001 or more sq. ft. (i.e., all development or redevelopment on R5 lots larger than 5,001 sq. ft. must be multifamily). Not only would this be an uncompensated (and likely illegal) taking

of property, it appears clearly designed to favor developers that wish to eliminate competition from prospective single-family homeowners when buying properties intended by them for redevelopment as multifamily rental housing.

Comment: Overlays are an inappropriate tool when applied citywide.

Discussion: It appears that the “a” Overlay Zone as proposed would apply to virtually the entire city west of I205. This is inappropriate. Land Use policies that are intended to apply citywide should be incorporated into the actual zoning regulations. Overlays should be tailored to smaller targeted areas based upon a careful examination of the existing land use characteristics of the area and the overlay rules designed to achieve a given result in the subject neighborhood.

The Buckman Neighborhood provides a good example of the potential unintended consequences of applying the “a” Overlay in a the indiscriminate manner you propose. Although the Buckman neighborhood is comprised largely of single-family zones R2.5 and R5, in 1990 only 19% of homes were actually single family compared to 55% citywide, and only 14% of the homes were owner occupied in 1990. Fully 81 percent of the housing units in Buckman are already multi-family as of 1990. (Do you know the comparable statistics today?)

Why do you want to target Buckman for elimination of even more owner-occupied dwellings? I assume you do not intend that outcome directly but your blind application of the “a” overlay to all city neighborhoods without consideration of their existing housing mix reeks of hidden agendas and pandering to development interests, and will promote the eventual extinction of owner-occupied housing in Buckman.

Comment: Your infill proposal will inevitably result in massive demolition of existing homes in the Buckman neighborhood WITHOUT any material increase in housing units.

Discussion: It is common knowledge that the majority of homes in Buckman in the single family zones (R5 and R2.5) are actually multi-unit structures. Many of these homes were built as multi-unit buildings and many more have been converted to multi-family; both legally and illegally. Many of these homes already currently have 4 or even 5 rental units. Under current zoning rules, if these multi-family homes are purposely demolished, only a single family home (with or without an ADU) can be built in their place. Until now, this has effectively limited the ability of developers to profitably tear down and replace these multi-family homes. What you are proposing to do now is allow developers to tear down these existing multi-family homes containing four or more existing units and replace them with only three or four new units. The result will be no increase in housing units overall, and the new units will undoubtedly be much less affordable than the existing units they replaced.

#### Summary

I hope you find some value in these high -level comments. You have a difficult but very important job to do and it is surely made all the more difficult by the political pressure from city leaders and advisory board members to cater to the development community, and the unfortunate conflict of interest created by a city government leadership that conditions your

	<p>continued employment on sustaining and increasing the flow of development fees used to pay your salaries. I sincerely appreciate the opportunity to provide these comments with the hope that it helps you balance the many competing interests as you refine and hopefully restructure your Proposal in preparation for formal public review and comment.</p> <p>Best regards,</p>
11/30	<p>As a current resident of ADU housing, I strongly support re-legalizing "missing middle" housing in as much of Portland as possible, including duplexes, corner triplexes, internal division of historic homes and cottage clusters. Reducing the size of new houses is a thoughtful compromise for reducing demolition, especially one-for-one demolitions that only accelerate displacement.</p> <p>More missing middle housing will be viable if the city waives on-site parking requirements near transit. Garages should be legal but not mandatory, especially since every driveway removes an otherwise good curbside space and, potentially, a tree.</p> <p>I want Portland to remain a place where my small family can live. Without this missing middle, I don't think it would be possible. Other families deserve this right.</p> <p>Thank you,</p> <p>Registered nurse, OHSU</p>
11/30	<p>Dear Mr Morgan,</p> <p>I support those provisions of the Residential Infill Project (RIP) that retain the character of the existing neighborhoods. Reducing the scale of new housing, measuring building heights from the lowest point of the lot, and averaging setbacks will allow infill to blend into the neighborhoods. These provisions will assure that Portland grows in a way that protects the great place that it is today.</p> <p>I oppose the RIP's A overlay that will affect 85,000 properties in the City. It adds capacity that is not needed. The Draft 2035 Comprehensive Plan clearly states that there is more than enough capacity under the current zoning for the growth that is projected through 2035. There is no need to add additional capacity for 85,000 units of unaffordable housing or 170,000 units of affordable housing. The RIP's A overlay adds these capacities by increasing the number of housing units allowed in the base zones. It will turn single-family zones into multifamily zones. I do not accept the flawed concept of the A overlay.</p> <p>If additional capacity is needed, then I support land-use planning best practices that require that base zones be changed in the Comprehensive Plan with community input. This approach would be consistent with Oregon's Land Use Goals. I urge you to remove the A overlay from the RIP.</p> <p>Retired Land Use Planner</p> <p>SW 57th Ave. Portland, OR</p>
11/30	Dear Councilman, or Councilwoman:

	<p>I have lived in Portland for 35 years and loved the first 32 of them. I have been dismayed by the 'homebuilders' densification of what was previously called the Rose City.</p> <p>Over decades I watched it become an art center and cultural center with a national reputation. The infill and tower building mania of the last few years has begun a plummet in the quality of life and an dark spot on what was a bright future.</p> <p>To what end? I ask.</p> <p>You were a kid once. Where did you play? I could play in the country, but sometimes I played in a vacant lot closer to home when I was a boy. A place for imagination to grow. That is where we made forts and discovered nature. Oh how dangerous that seems today, with Everything organized down to the last square inch. Also, What if solar power were to become real. Could sun find its way into neighborhoods?</p> <p>What if people wanted to live here because of the climate and the gardening, in the Rose city. Are you respecting those intentions?</p> <p>Children build their relationships with experience, ideally experience near their own homes. Vacant lots are a plus for discovering wild things and filling some grid to the very last dot is a banality. Life has variety and access to the sun. To build towers and infill cereal box houses is as though we will not depend on solar power in the future and shadows are of no consequence to that vision.</p> <p>I grasp that some look through the grid of transportation to see everything. Let us look at quality of life in richer dimension and cut some slack for the human part, and the energy part. There is more to life than density, and the reason people want to be here is being sorely eroded with the single function rationale of density.</p> <p>If you want broad principles think of sun-sheds and access to nature.... ungroomed life, that kids can experience as they grow into full on humans. For our humanity in the end will be what saves us.</p> <p>SE Tenth Ave., Portland, Oregon, 97202</p>
11/30	I have lived in NE Portland for over 18 years and I strongly object to the current RIP proposal.
11/30	<p>I have lived with my family in northeast for the past 18 years and strongly object to the current RIP recommendations.</p> <p>NE Laurelhurst Place, Portland OR 97232</p>
11/30	<p>Dear People Interested in Opinions re: the proposed Residential Infill Project,</p> <p>I am very excited about the potential of the RIP to make Portland a place where more people can afford to live, a wider diversity of income and mobility levels can live as neighbors, more people can use bicycles and mass transit to efficiently meet their transportation needs, and less carbon is emitted per capita.</p> <p>I reviewed the November 27, 2017 letter from Portland for Everyone (found here: <a href="http://portlandforeveryone.org/wp-content/uploads/2017/11/P4E-RIP-DD-Letter-">http://portlandforeveryone.org/wp-content/uploads/2017/11/P4E-RIP-DD-Letter-</a></p>

11.27.17.pdf ) and am generally in agreement with the recommendations made there. I'll focus in this comment on my experience as the child of an individual with significant mobility limitations.

My roughly 70-year old mother was diagnosed with Multiple Sclerosis in the late 1990's. She was wheelchair-bound by 2000 and has had progressively worse upper body mobility limitations in the years since. From the time I moved to the Portland area in 2001 (Portland proper in 2002) until my wife and I purchased a single-family home in 2009, I never lived in a location where it was possible for my parents to visit my residence. Visitability, or the potential to enable it with minimal modifications, was an important factor in our home search process. Of the numerous homes we looked at (and our realtor was well aware of our desire for visitability/accessibility), we saw a single house that was accessible. It was really great, with accessibility features nice enough that my parents could have even stayed overnight; it had been set up to be used as a daycare for the elderly. We couldn't afford it and nearly made some bad financial decisions in order to make it work anyway, but in the end we had to walk away. Something like a third of the houses we looked at had the potential to build a ramp to reach the main floor, but none of them had a toilet that would work for my mother without tens of thousands of dollars in remodeling.

We ended up buying something that fell into that category and doing a temporary (and later permanent) ramp to allow her to get inside, but she can only comfortably visit for a few hours at a time. Consider how long you would want to spend somewhere that you needed to endure a 15 minute car loading process, a 10-40 minute drive, a 15 minute car unloading process, and a 5 minute toilet transfer process in order to comfortably pee.

In 2015, we built a detached ADU with a specific couple and their child in mind as long term tenants, so we knew we wanted two bedrooms and 1.5 bathrooms. My initial hope was that we could make the half bath accessible so that we had at least one toilet somewhere on the property my mother could use. Less than 15 minutes into the design process with the architect it was clear that was going to be impossible in conjunction with our other goals, even with the maximum possible 800 sqft unit. Some wheelchair-bound folks can transfer to the toilet solo from multiple directions, but my mother needs an assistant and ideally a specific angle, which means a 6+' by 8' space. You just can't carve a square that size out of a 16' by 25' first floor footprint and have enough left over for a snug-but-comfortable kitchen/dining/living space for a family. (We're happy to have someone stop by and try to imagine what the end result would look like with something bigger than the roughly 2.5'x4.5' half bath we ended up with!)

Therefore, I urge the city to make, at a minimum, the accessibility-related changes outlined in the above letter to the RIP. I also strongly support the addition of some non-variance mechanism whereby the addition of accessibility features to a unit allow increased square footage (unit AND overall), less stringent setbacks from the lot line and/or higher maximum building heights, in proportion to the extent/nature of the accessibility feature.

Unfortunately, I think it is unreasonable to provide some sort of universal "accessible feature=50 bonus sqft, 12" closer to lot line, 2' max height" mechanism. You can make an ADA-compliant bathroom that my mother can't use; judging by the percentage of "accessible" bathrooms she's encountered that are useless to her, it's a lot cheaper and

	<p>easier to do so than make one she can use. A ramp for a lot 10' above street level is 120' long; for a lot 1' above street level you need a 10' ramp. If you are trying to use the same ramp to enable access to an existing structure on a foundation and a new structure, you need the maximum height flexibility to put the new structure on a foundation of the same height instead of slab on grade. (This was the issue that required us to go through the variance process with our ADU.) I don't want a scenario where developers put in two 36" wide doorways and get the same bonus as someone who puts in an automated hoist system (e.g. <a href="https://i.pinimg.com/236x/f3/11/b4/f311b4e90a79a688652d5a372fe5841f--mobility-aids-house-ideas.jpg">https://i.pinimg.com/236x/f3/11/b4/f311b4e90a79a688652d5a372fe5841f--mobility-aids-house-ideas.jpg</a>), roll-in shower or other significant accommodation, but I do want someone to be able to build an ADU for their parents after dad had a stroke without too much delay or compromise of livability.</p> <p>If we want to truly support accessibility, we need to make it possible for someone to build a fully-accessible unit with the same number of usable rooms as a completely non-accessible unit of the same type. I don't think we want to continue the current reality of: "You can totally live in Portland with significant mobility constraints as long as you pay as much for your studio apartment as the family of three next door pays for their two bedroom!"</p> <p>Thank you very much for your time and consideration,</p> <p>NE 65th Ave</p>
11/30	<p>To those who will decide the rules for Residential Infill,</p> <p>We are told that Mayor Wheeler and others want to make Portland a “world-class city.” We are also told that the Residential Infill plans will generate “affordable housing.” Now, please name for me even one “world-class city” that has “affordable housing.” All the world-class cities I can think of all have “world-class” slums and very little housing that is “affordable” to people who don’t have “world-class” incomes.</p> <p>This clash of irreconcilable goals—“world class” and “affordable”—is relevant to the Residential Infill Project. I predict that a very small proportion of the units built under the guise of Residential Infill will be affordable to the low-income Portlanders who need them most. The rest will be sold or rented at market value. Two sure things about this deal are that R-5 neighborhoods in the Inner East Side will lose their “neighborhood” character, and that the developers will reap huge profits.</p> <p>If I’m wrong about this, and houseless people are housed and those who struggle to pay their rent can find good dwellings for an affordable price, then I’ll rejoice. And if, in addition, the beautiful older buildings that distinguish our neighborhoods are preserved, then I’ll praise you folks as brilliant visionaries. BUT, if I’m right, how will you feel?</p> <p>Sincerely,</p>
11/30	<p>To whom it may concern-</p> <p>I respectfully request that the height limits currently allowed within R2.5 and R5 zones are maintained, and the revised height measurement component of the Residential Infill Project is not implemented.</p>

	<p>If implemented, the proposed changes will reduce the allowable square footage that can be built within the Urban Growth Boundary, as it will limit new residential structures to two floors, unless the structure is built on a flat lot and at sidewalk level. If built on a flat lot and at sidewalk level, the ground floor will be a less than optimal living environment - in that it will have little privacy from passing pedestrians.</p> <p>Limiting / constricting new construction in this way does not reflect a long term view, or acknowledge the crucial role allowable square footage within the Urban Growth Boundary has in limiting sprawl outside of it.</p> <p>Living space spread between three floors - rather than two - allows preservation of natural / landscaped areas on residentially zoned sites - already limited because of their modest size. It allows an important portion of a typical 5,000 square foot lot to be preserved for things like gardening, growing food, and providing a safe place for children to play.</p> <p>The decisions being considered in the Residential Infill Project will have a profound impact on the livability of Portland, as well as the areas around it. They will shape and determine whether we use urban land 'efficiently', or opt to allow the natural areas around Portland to succumb to sprawl. The latter would be unfortunate, particularly for the wildlife that depends on what's left of the habitat we have degraded - and ultimately for ourselves - if we continue to pave over surrounding farmland.</p> <p>'When it's gone, it's gone...'</p> <p><a href="http://www.cbc.ca/news/technology/15000-scientists-warning-to-humanity-1.4395767">http://www.cbc.ca/news/technology/15000-scientists-warning-to-humanity-1.4395767</a></p> <p>Respectfully,</p> <p>[Attachment includes a photograph of a suburban neighborhood abutting farmland.]</p>
11/30	<p>Dear staff members,</p> <p>I have only recently learned about the reconciliation of the comprehensive plan with new zoning in particular as it relates to the residential infill project. I understand the this project is explained as addressing community concerns about demolitions and the scale of new homes as well as the supply of housing, and I have two comments.</p> <p>The first is it is not clear as to whether existing lots that have no building on them are under these new guidelines or if it pertains only to those lots that currently have structures on them.</p> <p>The second and more important comment I have is that while the maps overall in the report show general areas across the city impacted by this project, it is only when looking at the interactive maps that one sees specific lots being rezoned from R5 to R2.5. I live in the 97212 zip code area and while some of the new areas being rezoned follow your guidelines of selecting lots very near services, amenities or those that adjoin higher density zones, that is not true for the several blocks from NE33rd to NE 35th Avenue from about Siskiyou to Morris Streets and the blocks from NE 32nd Avenue to NE 33rd Ave from Morris to Stanton. These are smack in the middle of a large R5 zoned area, not near any high density zone, and not adjacent or near services such as the proposed areas near 42nd and Fremont or much</p>

	<p>further north on 33rd. Not only is this a disconnect from the report's location criteria, but also from the report's stated purpose of reducing the scale of new single family homes so that they are more compatible with existing neighborhoods. Given the R2.5 ability to attach 8 units together and a height of 35 ft, this rezone definitively permits much higher and larger buildings than the existing housing stock on and near these blocks. I suggest that this is not an appropriate area to be rezoned.</p> <p>Sincerely,</p>
<p>11/30</p>	<p>Hello,</p> <p>Thanks for your work on the Resident Infill Project proposal. I generally support the overall aims to stop incentivizing expensive "McMansion" developments, increase density and affordability, and plan for sustainable infill development that serves the city we are becoming.</p> <p>However, a few things I'd love to see strengthened:</p> <ul style="list-style-type: none"> <li>• Eliminating minimum parking requirements, which will help remove barriers to developing duplex/triplex type units, as well as with preserving our precious tree canopy.</li> <li>• Expanding the "housing opportunity" provisions to all areas of the city, especially historically underserved areas like East Portland.</li> <li>• Ensuring that affordable housing incentives are practical and enticing to developers, so that they actually take advantage of them.</li> </ul> <p>The last thing we should be planning for as a city is locking in future infill development to serving yesterday's needs rather than planning for tomorrow. We need more housing (ideally affordable) for humans, not housing for cars.</p> <p>Thanks for your time,</p> <p>SE 75th Ave., Portland, OR 97206</p>
<p>11/30</p>	<p>Morgan and Julia,</p> <p>Please accept my comments regarding the BPS Residential Infill Project proposal.</p> <p>I am pleased about the city's efforts to plan for the future and the intent to respond to affordability and livability concerns of residents. I like that the plan creates more housing options, addresses the scale of new single dwelling development, and improves some design and accessibility standards.</p> <p>As a homeowner impacted by the "a" overlay, there are some important elements of the proposed RIP about which I want to express questions and/or concern. I strongly encourage you to take seriously all the comments received and use them to create a better plan that does not risk sacrificing the livability of Portland neighborhoods, one of our prized assets as a city. Here are several areas of concern:</p>

- a) Green space/natural areas - We will lose green space and tree canopy (through 2015 we were slowing increasing residential canopy) with increased density of development on single dwelling lots. I do not see a concomitant plan that will require protection of trees on redeveloped properties or offset this loss with more parks/open space in neighborhoods (many of which are already categorized as park deficient). As we increase density in single dwelling neighborhoods, it comes at the detriment of water and air quality, wildlife, and our health if we are not more intentional. More impermeable surfaces will increase stormwater runoff, reduced canopy will hamper our ability to manage air quality, and reduced green space will mean less habitat for insects, birds, and mammals. Trees and greenery are economically valuable (we often fail to account economically for the many services nature provides both in the short and long-term). And finally, green space, parks/open space, and trees are not only aesthetically pleasing, they are good for our health in myriad ways - physical, mental, and spiritual. Just one example is neighborhoods with more tree canopy near houses have improved birth weights [http://www.oregonlive.com/health/index.ssf/2011/01/more\\_trees\\_in\\_a\\_city\\_bring\\_sur.html](http://www.oregonlive.com/health/index.ssf/2011/01/more_trees_in_a_city_bring_sur.html). More research is necessary, but the research is strong that exposure to nature reduces stress. We must better address these issues in this plan and/or integrate other city bureau plans with this plan to ensure protection of green space and canopy.
- b) Affordability and Gentrification -The old "build our way out of it" strategy has been proven to fail in many ways across the country. Yes, more variety in the housing options / size will help on both fronts. Adequate supply can reduce escalating prices, but in recent years that does not appear to be case in Portland and it will be difficult to outpace the rate at which people are moving here. Plus, right now it is the developers who are seriously profiting, less so communities and homeowners. New infill development typically sells at considerably higher prices (often out of reach for the average resident) than the homes it replaces. I appreciate that there are also affordability incentives in the plan. What is the research/data on the profitability of multiple affordable units vs. fewer non-affordable units? My guess is that developers will profit more with non-affordable units and/or it will lead to poor quality developments to maximize profitability. Can we ensure that the incentive is adequate to be competitive, or do we need to sweeten the incentive? Can we include quality standards on those developments? Generally, the plan seems to fall short of an adequate strategy for addressing affordability. Affordability and gentrification are closely linked as people of color have historically been excluded from generational wealth through home ownership. We are in a complex system and I am not convinced that reducing the "a" overlay in areas with communities at risk of displacement (i.e. low-income and communities of color) is an adequate solution (what are the increases in variety of housing and affordability incentives in those neighborhoods in that case?). I don't pretend to know the solution, but it appears that deeper thinking needs to be done.
- c) Demolition - While it sounds like this plan was meant to address concerns about demolitions, I don't see how. It appears to me that this plan creates major incentives for investors/developers to buy existing homes (they can easily out compete the average home-buyer) and demolish them. While some homeowners will convert

their homes or add an ADU, many will sell to developers who very often demolish, build new, and profit more. How can we at least somewhat reduce the incentives to demolish and increase the incentive to redevelop existing structures? While I know the city is also considering more environmental and health regulations around demolitions, right now they are inadequate for protecting neighbors. Again, there must be revisions to current regulations and an integrated plan to address the impacts of demolition.

- d) Character - Certainly not everyone agrees on what is aesthetically pleasing, but new development styles often don't align with existing neighborhood character (there are many, many examples). This plan speaks to historic homes and neighborhoods, but those designated as such are few. There are whole neighborhoods that were largely developed during the same time period, so new developments that are out of alignment with the existing character of the neighborhood or adjacent properties are aesthetically jarring and upsetting to neighbors (and not just old timers, but young people too - I've spoken to many of them). Can we create design criteria that better retain the character of neighborhoods? While some design issues in the plan have been positively addressed, right now the goal of better integrating with existing homes does not yet seem adequately met.

The proposed RIP is a good start. Let's improve this plan. Let's use a more holistic systems approach and integrate planning across bureaus carefully. Let's ensure we are really testing our assumptions and looking intended and potential unintended consequences. Let's elevate a wider range of values we hold as a community.

Thank you for your hard and thoughtful work thus far,

11/30

Hi,

I'm just writing to voice my opinion about the RIP map with the proposed overlay zones, specifically the exclusion to the 'a' additional housing. I'm probably not the only one with worries about not being able to develop when the majority of the city can. It is placing a huge economic incentive and value on properties with this zone. To explain my scenario, which others may share similarities to, my house (8205 SE 45th Ave) is on a corner lot with a small garage on Tenino and the front entrance on 45th. It is a walkout basement, unfinished currently, but with potential to be an ADU. The garage also has potential to be a second ADU. With family sizes shrinking, and the need for housing rising, it is the perfect spot to create multiple dwellings or a duplex with a detached ADU. There is offstreet and onstreet parking, a bike lane on 45th, a bus stop for frequent service 1 block north or south of us. I bike to the max to commute and my husband takes a bus. There is a school 1 mile away, and New Seasons, Safeway, restaurants, and services are just up the hill. It seems like the ideal scenario for a lot that is already set up to work well for multiple units. The exclusion may be due to the proximity to Johnson Creek or a flood plain. I'm not in the flood plain though, and I would not be creating anymore impervious area onsite. As for developed/undeveloped roads, my address is on 45th, a highly used developed and connected road. Tenino is paved with curbs and a sidewalk on my property to the neighbor west of me. Tenino east of 45th is a wreck of an unpaved network of gravel, pot-hole ridden streets, yet that is in the overlay zone next to Errol Heights... I'm hoping that there could be exceptions made to allow increased units similar to 'a' overlay zone if the city approved case-by-case. I'm not sure if

	<p>that would be allowed as a land-use review or what that process might be, but there are always exceptions to the rule.</p> <p>Another concern is that where some of the exclusions to the 'a' overlay are happen to be in less developed, poorer neighborhoods, IE Lents and Cully. There may be reasons other than undeveloped streets or lack of transit within ¼ mile that I am unaware of because I have not thoroughly reviewed this proposal in full detail. You could argue that the city is already placing an economic burden on these areas by spending tax money to pave the rest of the city while leaving these in the dirt for the owners to pay out of pocket for a street improvement or LID. If the city suddenly raises the value on a majority of lots in the rest of the city for increased residential development, there is a larger gap created between highly valuable/expensive housing/land versus those not in the overlay. Maybe it is an unintended consequence that is unavoidable, but it seems that some of the qualifiers for the overlay zone could be met at some point in the future with increased transit, street improvements, and amenities brought to those neighborhoods.</p> <p>Overall, I am supportive of the proposal given our housing shortage. I would love to see more infill, while preserving the character of the city. I do not want to lose this character with developer-driven design, much of which has already impregnated our neighborhoods with giant out-of-scale monstrosities and is stealing Portland's soul and future charm (when their cheap materials and crappy construction catch up to them). I appreciate specific measures taken to alleviate the size of houses, proportion, and breaking up of their facades. I hope you have some insider developer foresight to concisely spell out these rules and any new guidelines to combat how they will get around the new regulations...</p> <p>Please call or email with any questions or follow-up.</p> <p>Thanks,</p>
11/30	<p>I write in support of narrow two story homes on narrow lots or two narrow homes on a wider lot.</p> <p>I own no investment or financial interest in any real estate or real estate business, other than my home. So far as I know no one in my family has any such holdings.</p> <p>In 1910, my grandparents built such a narrow two story home with a full basement, garage included, at the northeast corner of N.E. Grand Avenue and Shaver Street. The home stands today. As a youngster I spent many Sundays and Holidays there with my parents and extended family. My mother grew up in a home on Northeast Garfield Avenue just south of what was then Portland Boulevard. My parents attended grade school and high school in Portland. I attended Central Catholic High School and the University of Portland. My son and his family live in the Overlook neighborhood. I have relatives all over Portland. I relate this family history so you will understand where I am coming from.</p> <p>I support allowing two story homes on narrow lots, if, and only if, there is parking for at least one vehicle on site.</p>

	<p>I disagree with those who want the proposed revised city plan to prohibit tearing down older homes, or building narrow two story homes. Nobody should be guaranteed a neighborhood frozen in time.</p> <p>N. Lotus Isle Dr., Portland OR 97217</p>
<p>11/30</p>	<p>[From attachment:]</p> <p>Dear RIP Staff Members:</p> <p>Like my fellow HAND Board members, I support many of the recommendations within the Residential Infill Project, but remain very concerned about the potential negative impacts of the proposal such as an increase in demolitions, the loss of even more affordable housing in my neighborhood, limited opportunities for ownership of the new, smaller structures, the lack of design guidance as infill occurs and finally a loss of sense of place. I fear the primary beneficiaries of the RIP will be investor owners and developers of market rate housing, not the many people desperately seeking more affordable housing or the middle class families with children who sustain Portland as a livable city.</p> <p>The RIP proposal includes three very different proposals: Scale of Houses, Housing Opportunity Overlay, and Narrow Lots. Each of these topics would be complex enough on its own, but when amalgamated into a single proposal, it becomes overly complicated and confusing. I wish you could return to your original strategy of working with the public on one of these issues at a time while keeping in mind possible impacts on the other two items for later consideration.</p> <p>Scale of Houses</p> <p>The proposals for reducing housing size are a good start, but do not go far enough. Though the proposal represents a significant reduction from what is theoretically buildable now, the proposed structure sizes are still much larger than most of the existing housing stock in HAND. This proposal could be strengthened, with size and height further reduced, perhaps by including basements and attics in calculations of a house's square footage if they are less than 2ft above ground, or in the case of attics, are tall enough for dormers to be added to create a usable living space respectively.</p> <p><u>Setbacks:</u> The proposed code seems to allow a decrease in front setbacks and I want to make certain that it also allows an increase in front setbacks to match adjacent neighbors. For existing neighborhoods simply averaging setbacks on both sides or even over an entire block would be a more reasonable approach.</p> <p><u>Roof Height:</u> I would like to see a similar approach applied to height, perhaps limiting houses to a height of their tallest neighbor plus 5 feet. Or vary roof heights to correspond to lot size by allowing higher roof lines on larger lots with greater side setbacks. Limit roof height on a 5000sf lot to 25 feet with step ups to 32 feet for larger lots. Exception: If at least 50% of houses within 300 feet are taller than above limits allow houses to be up to 30 feet high</p>

The code should not allow low point of street facing property to be artificially raised through use of a retaining wall and the grade should not be allowed to be artificially built up to alter reference point (“low point”) for measuring height of the building.

#### Housing Opportunity Overlay

The Housing Opportunity Overlay proposals fundamentally redefine what it means to live in a single-family zone. If that is your intent, why not simply change the meaning of the underlying zones rather than rely on the overlay mechanism. The overlay makes life even more uncertain for people buying or renting a house in an area within it. Each nearby home sale brings the possibility of a tear down and construction of a new building. Making such sweeping changes to the zoning code whether or not an overlay is used, without any site-specific context, could lead to many unintended consequences.

Where triplexes are permitted on corners, please ensure that at least one entrance is facing each street. This is likely what was intended, but the proposed code language does not require this.

Internal Conversions: Allowing internal conversions of larger single-family houses to duplexes, triplexes or even four-plexes is a way to add density and create more housing opportunities while avoiding many of the negative issues associated with new construction. Require maintenance of most or all of the front facade in this case. Move this provision out of the overlay zone and into the base zoning, and apply it city-wide. However, before doing this, consider revisiting the definition of a “demolition” and a “major remodel” to make certain internal conversions don’t lead to a major remodel or a de facto demolition.

Articulation of large street facing facades: This is already in the code for larger buildings and can encourage front facades divorced from the rest of the building or can be abused by the application of multiple siding types. However, we have examples in inner east of buildings with no or very small windows on the front facade and no other articulation so this is needed.

To counter the incentives for demolition presented by the overlay proposal, consider awarding bonus units only if existing structures are preserved.

Cluster Housing: I am very supportive of cluster housing but understand the Planned Unit Development review process leaves the plan approval to staff. Would the community have a say in how total FAR, lot size, number of units, building orientation to street and neighbors, open space, etc., are addressed? There needs to be flexibility to allow creativity while ensuring quality design that respects the surrounding context.

#### Opportunities for East Portland

Large portions of East Portland are being excluded from the overlay zone because of lack of infrastructure, school capacity, etc. If the RIP is a long term approach to housing in Portland, there needs to be a continuing strategy for building “complete” neighborhoods in East Portland that includes infrastructure investments and is sensitive to involuntary displacement issues. This would allow residents in those neighborhoods to also take part in

creating new housing options. Often increased density leads to more frequent transit service rather than the reverse.

#### Narrow Lots

Where narrow lots currently exist, we support the proposal to require adjacent houses to be attached. This will increase the livability of the units, and will improve their exterior appearance.

Consider reducing building height of common wall structures on lots less than 5000 sq' to 30' perhaps with an option to go to 35' if tuck under parking is provided.

Please look again at the relationship of FAR to the size of the lot. The recommended 0.7 for narrow lots seems like it would be out of scale in some neighborhoods and limiting the FAR to 0.5 on all residential lots of 5000 sq ft or less would be more consistent with existing patterns. Perhaps an adjustment process could be used in those instances where existing residential patterns are closer to 0.7 on surrounding lots. Here again the proposal seems to be using somewhat of a one size fits all approach.

#### Tree preservation and Stormwater Management

A healthy urban tree canopy, and smaller, discreet, and more flexible housing options can go hand in hand. However, we have watched large, mature trees disappear as lots are split in our neighborhood. Design flexible code provisions that incentivize saving larger trees and creating less impervious surface. These incentives could include parking requirement changes, and flexibility in building siting and setbacks, among others.

#### Ownership Options

Explore carefully the possibilities and potential pitfalls of extending fee-simple ownership options, condominium conversions, co-housing and other strategies for ownership to these situations.

#### Affordability

What is missing from this proposal is any focus on our disappearing stock of affordable housing. To the extent that the Housing Opportunity ideas work, they will accelerate the demolition and redevelopment of our most affordable housing stock, replacing them with significantly less affordable housing. A prime example is the demolition of the house at 2838 SE Woodward. A historic house used as shared rental housing for a group of adults was demolished and replaced with two huge houses that sold for \$900K each. Density increased, but at the cost of affordability. Renters were displaced, the community lost income diversity, and the new structures did not fit well with their surroundings. To reduce the incentives for further losses of affordable housing, I would suggest:

Additional limitations on the size of housing (as outlined above) are probably the single most effective way to limit the cost of new housing. Smaller houses are inherently less expensive

than larger houses. While we do not believe this is a panacea for our housing crisis, this will help more to slow the growth in housing prices more than anything else in this proposal.

Simply encouraging the development of more ADUs does not help with the housing crisis if the units are not rented to those who need them. Introduce further limitations on using ADUs as short-term rentals, thereby encouraging their use by long-term tenants. Do not continue to waive SDC's for projects that cannot commit via covenant to at least a set time period with an affordable rent and/or a commitment to providing long term rental housing, especially in inner tier neighborhoods. Explore making all free-standing ADUs not located above garages accessible.

Where a bonus unit is awarded on grounds of affordability, please lower the definition of "affordable" from 80% MFI to 60% MFI to allow these units to benefit those who are having the most difficulty in the current market.

Please explore some of the options for increasing affordability laid out by SMILE:

- Require the additional (third) unit to be affordable (as a bonus unit)
- Subsidize purchase of a duplex and owner occupancy of one unit if the second is an affordable rental.
- Have fees from short-term rentals help to subsidize affordable housing in the same neighborhood
- Dedicate tax revenue from the additional unit to provide affordable housing in the same neighborhood.
- Provide an incentive for duplex or triplex owners to occupy one of the units, perhaps for a first time buyer willing to rent the additional unit(s) at an affordable rate.

I share the concern of others that new duplexes and triplexes are more likely to be investment properties where an owner is less likely to engage with the neighborhood and rents can continue to escalate. I'd like to see the new smaller scale housing provide new opportunities for more, residents to own property, escape future, out of control rents and begin to build wealth as other groups and previous generations have done.

I would like to see resources devoted to the development of a toolkit and perhaps regular "Lunch and Learn" sessions to assist homeowners wishing to add housing units, whether as ADU's or internal conversions, that could provide step by step assistance in navigating the appropriate bureaus, information on strategies to increase accessibility, references for design guidance and options for sharing ownership.

Thank you again for all your hard work on this project and for considering these ideas.

Sincerely,

11/30

Dear City Staffers and Decision Makers,

Thanks you for all the great work you do and for moving Residential Infill Project forward.

My comments on the RIP discussion draft echo those of Portland for Everyone.

My basic recommendation are:

1. Scale of Houses:

- Keep scale as proposed
- add: increase Floor Area Ratio for duplexes and Triplexes to make them pencil out for developers.

2. Housing Types:

- Keep provisions Duplexes on all lots, Triplexes on Corner lots, Two ADUs with one Duplex and
- Change allowance form one extra unit if all are affordable to allow extra units if one is affordable, and additional FAR for family-sized affordable units.

3. Narrow Lots

- Change from 'a' overlay 1/4 mile form centers and transit corridors to allow in ALL single dwelling ones
- 
- Keep rezone historically platted narrow lots to R2.5

4. Preventing Demolitions:

Change from 'a' overlay 1/4 mile form centers and transit corridors to allow in ALL single dwelling ones

- Allow internal conversions into 2-4 units for any house more than 10 years old.
- No density limit for historic resources.
- Allow flexible site plans reduced parking requirements and additional FAR

5. Cottage Clusters

- Allow as either Portland Developments of Subdivisions
- Provide a density bonus for smaller houses

	<ul style="list-style-type: none"> <li>• Provide an additional density nobus for fully accessible houses</li> </ul> <p>Thank you for considering the updates.</p>
11/30	<p>Please enter both articles into the record.</p> <p><a href="http://www.oregonlive.com/opinion/index.ssf/2017/11/where_a_home_for_everyone_coll.html">http://www.oregonlive.com/opinion/index.ssf/2017/11/where_a_home_for_everyone_coll.html</a></p> <p><a href="http://portlandtribune.com/pt/10-opinion/377933-262545-my-view-residential-infill-project-needs-changes">http://portlandtribune.com/pt/10-opinion/377933-262545-my-view-residential-infill-project-needs-changes</a></p> <p>Do let me know if URLs are adequate or do I need to send them as attachments? I'm especially interested in your going to the URLs because the comments sections of both articles where Danielle Zeghib and Lucas Gray respond to comments and help to further elucidate what it will take to get true residential infill.</p> <p>I'm also a member of Portland for Everyone and especially support their comments on "Cottage Clusters", on "Narrow Lots" and on replacing the "a" zone with a "T" zone.</p>
11/30	<p>BPS</p> <p>My comments on new section 33.405 are written primarily from the perspective of historic districts, and based on my 7 years of experience in reviewing and writing responses to over 500 applications in the Irvington Historic District (IHD).</p> <p>Since the City is embarking on HRCP 2, 33.405 should not cover in any way, any existing or new historic district, and HRCP 2 should be charged with dealing with additional density and “visitability” provisions. HRCP 2 will be covering ADUs, conversions, and other matters discussed in 405. At a minimum, subsections 405-050-080 should not cover any existing or new historic district and should be added, if at all, through the HRCP process.</p> <p>General comments regarding the introductory material Section 7</p> <p>P. 23, in my experience with Central City Concern, the incentives contemplated by 405 will not work financially for projects built by CCC or similar nonprofits. Most housing units built or remodel by CCC have been in commercially or multifamily zoned property, and usually have more than 20 plus units.</p> <p>P 24, Please note that although the exemptions are somewhat different for noncontributing resources, both contributing and noncontributing resources are subject to historic review. Noncontributing resources with proper notice can be demolished, and the infill is subject to historic review and compatibility standards in the current code.</p> <p>P 24. No site in an historic district should be allowed to use the bonus provision if the resource has been demolished.</p>

P 24 There should be no FAR bonus for conversion of historic resources in an historic district.

Other general comments:

The revised code must make clear that such regulations will not eliminate or change existing requirements for Historic Resource Review, and 405 will not provide an alternative regulatory path to bypass HRR, regardless of the zone designation. For example, Irvington has a lot of R-5 zoning, but also significant multi family zoning, R-1, R-2, and RH, plus two commercial zones, and one employment zone. .

Specific comments:

33.405.050

Delete all references to triplex. Duplexes are currently allowed in the code on corners, but not many have been built. Before moving on triplexes perhaps BPS should figure out why duplexes on corners have not work.

Allow only one ADU detached, and one ADU internal and cap the number of sites that can use this allowance on any given block face to two.

Change table 405-1 by deleting triplex references, and changing 4500 and 6500 to 5000 and 7000 respectively.

Delete table 405-2

060 Not a bad idea, has it worked elsewhere? Can we try these standards in a pilot area and see if they work? Changes like these will cost money, and builders, in my opinion, will not build such units. But if they work in a test area, I am for it.

070 generally this section should be deleted and the assignment given to HRCP to deal with internal conversions. All structures and sites in an historic district can add an ADU, and ADUs are increasing density, at least in the IHD. All applications for ADU have been approved, but many are being used for short term rentals. Until the use of all these additional units is regulated, we will get density but for short term renters, like Airbnb.

Specific comments on 070

070. B Delete the date, do not see the purpose. Also why not say if demolished, contributing or noncontributing, cannot use the bonuses in 050.

070.C Object to inclusion of this multi-family language as applying specific entitlements even when not granted under the zoning code. It should read -When a HR is entitled to add additional density as specified elsewhere in the code....

	<p>070.C the specifics in C should be part of HRCCP. The compatibility standards in 33.846.060 (g) have worked in the Irvington District much better than I initially thought they would, especially with respect to setbacks. Much of the specifics are matters for design review.</p> <p>Finally, parking is becoming more and more of an issue in the IHD, and should be required in some fashion. Again, a matter for HRCP. Also, the City is moving to put a streetcar line on Broadway which will put additional parking pressure on adjoining streets, which are already parking lots for much of the day.</p> <p>33.405.080 bonus will not work in single family zones, especially in an historic district. This section should be deleted and limit the section, if it is needed, to read -When a HR site is entitled to add additional density as specified elsewhere in the code....the standards for design review of historic resources will govern the review of modifications and additions, including those allowed elsewhere in the Code. This provision appears to be well intentioned, but I do not see it working at all. We should discuss in HRCP the concept of affordable bonus units, but throwing it on every sf zone in the City is unconscionable.</p>
11/30	[Attachment content follows:]

Dear Portland BPS Staff and Reviewers,

Thanks for the opportunity to comment on the Residential Infill Project draft Code revisions.

The RIP has emerged as an assortment of code revision proposals adding significant complexity to the zoning code. Included are sensible if fragmented code revisions to address issues of scale in the R5 zone and to improve the R2.5 zone and to address problems associated with substandard lots and the skinny house phenomenon. But these are largely a distraction from the *core proposal* to blanket much of the city with a rewrite of the single dwelling zoning code. Those provisions violate the spirit and intent of the 2035 Comprehensive Plan.

Failing to consider history, economics, and in situ neighborhood context, the *core proposal* code rewrite (aka HOOZ) and its accompanying zoning map comprise a fundamentally flawed and ultimately destructive vision for Portland. There are four areas of impact that the proponents and authors in their enthusiasm have failed to reasonably address:

**Displacement – Demolition – Destabilization – Disregard of the 2035 Comprehensive Plan**

**Displacement:** The less affluent in every neighborhood are being displaced by density entitlements. Claims to the contrary, that trend will accelerate with the Densification RIP. From the real estate pages, it is evident that newly remodeled and replacement housing will be much less affordable for both renters and buyers than existing viable housing stock. The one economic study (Johnson) focuses on rental pricing. No study has assessed the economic, social, or environmental impacts of *the elimination of the single dwelling zone* (envisioned by the RIP). Rezoning of single family neighborhoods to encourage comparatively large multi-family buildings (see end note 1) containing small apartments is clearly intended over time to remove nearly all single family houses in the city. The beneficiaries of the Densification RIP will be investor owners and developers of market rate housing. For the close in neighborhoods, the buyers or renters will be affluent and likely downtown workers who prefer smaller housing options. In short, not the middle class families with children who sustain Portland as a livable city.

**Demolition:** The rash of demolition of viable housing in our character-rich, resilient, environmentally sustainable neighborhoods will be fueled- not tamed - by the RIP. Is this what we intend for our city? The most vulnerable homes are the most affordable for developers to demolish. Even now without the RIP, it is clear that the RIP will not protect but rather accelerate demolition and diminish our more affordable housing stock, our goals for a green city, ambitions for an inclusive city, and distinctive neighborhood character.

**Destabilization:** The RIP violates a fundamental purpose stated in the zoning code 33.110 to provide stability and predictability to single dwelling neighborhoods and the development process. It encourages tri-plex (or potential three owner) structures on every lot with *entitlements* for developers/owners. In this way the RIP *destabilizes land values* in the affected neighborhoods. It accelerates ongoing uncertainty about the future of nearby properties and neighborhood anxiety.

As a housing type, the tri-plex is inherently unstable under condominium ownership, and less than ideal as rental property. Few exist. Regardless, the randomized density presages more density and presumably more remunerative density options to be introduced in future.

The RIP also redefines terms in a way that destabilizes the integrity of the code.

Recharacterizing “tri-plex”, a multi-dwelling type, as a single dwelling building type is plainly disingenuous manipulation of the language. The building code defines a tri-plex as a multi-dwelling structure. Tri-plexes are currently allowed in multi-dwelling zones configured as a rental or condominiums sharing a single lot.

“Auxiliary” (the A in ADU) means by intent and definition an independent living unit supplemental to the primary residence on a single tax lot. Redefining the meaning to include independently owned units that happen to be smaller than the larger apartment on a shared lot violates both the definition and intent of the concept. The double ADU becomes synonymous with triplex.

Single Dwelling Zone means a single dwelling on a single fee simple tax lot. It does not mean 2 houses on a 5000 SF lot (that is an R2.5 designation), nor 6 houses on a 10,000 SF lot as the RIP HOOZ overlay proposes. The zoning code is based on a range of density of living units. With the HOOZ, the R5 zone allows more density of units than the existing R2 zone. The R2.5 zone allows more density than the R1 zone.

When attempting to *game the public* in this way, the credibility of the code (along with credibility of civic leadership) is being eroded as is the expectation for stability when *every home-sale* becomes a potential disruptive tear down.

**Disregard of the 2035 Comprehensive Plan:** The RIP HOOZ undermines the themes and guiding principles of the Comprehensive Plan. To highlight a few:

- Goals to focus density around centers and corridors, where appropriate, are undermined. Density is randomly dispersed - not focused. Centers remain on paper for decades but are retarded by the wide dispersion of density (including dispersal to the more stable suburban cities).
- RIP’s one-size-fits-all approach for most neighborhoods in the city violates a guiding principal in the Comp Plan of “one-size-does-not –fit-all”. Close-in neighborhoods that have a variety of housing types already but were stabilized in the recent past are again targets for destabilization. The code makes no distinction among characteristically disparate neighborhoods (also a failing of the “5 Portlands” theme).
- The goal to support increased walking and biking is undermined. Dispersed density increases dependency on auto-based transportation. Parking needs are ignored.
- Goals of preservation, distinctive character, and design are ignored if not eroded. Internal conversions are rarely feasible even where appropriate. 33.405.070 appears redundant except intended to undermine historic resource review for future National Historic Districts.
- The tradition of public involvement required by state law and reiterated in the Comp Plan for neighborhood planning processes have been manipulated in the RIP as documented by (Lewis and Clark student)

- The RIP violates the intent of developing zoning regulations as described in the Comp Plan. Redefining tri-plexes and ADUs further erodes R5, and R7 density standards and masks fundamental revisions to the adopted Comp Plan maps.
- The RIP ignores the city's claims to already have a 20 year supply of available buildable property. Housing advocates whose goals are "affordable housing" want action in the name of addressing a housing emergency for which public funding and inclusionary zoning, not densification is the solution. Densification is neither a solution nor an indicator of affordability. Look at any large dense city. The wealthy have a variety of choices – the poor are crowded in subsidized housing, and the middle aged middle class move out.
- The RIP promotes additional housing types in single family neighborhoods. Without changes to the existing code land for these housing types is entitled but largely unbuilt. For example, BPS admits that 5% or fewer corner lots on which a duplex is allowed have been developed in that manner. (In 2016-2017 a total of 25 duplexes were permitted). Tri-plexes are already possible in the R2 and R1 zones as are clustered housing in a variety of residential designations.
- The RIP reflects a planners' *vision* apparently intended to discourage single family housing types. Repeatedly polls regionally and nationally show these to be the favored housing type by a large majority of the citizens and which the Comp Plan is committed to preserve.
- Intended or not, the RIP establishes a *vision* for a multi-tenant, investor ownership model for most of its East side neighborhoods. This leaves Portland's suburbs and a few especially exclusive west side neighborhoods to provide the market for stable single family ownership opportunities.

#### Two Sides of the RIP

Initiators of the core proposal (Portland for Everyone/One Thousand Friends) claim their radical rezoning will result in "equity outcomes", create "additional walkable neighborhoods", result in affordable housing, support a "healthy urban tree canopy", "alleviate chronic suffering of tens of thousands", "preservation of existing housing stock", give folks "a chance to grow up – or grow old- "in their neighborhood, etc., etc.. These claims mask the central device for achieving these laudable goals – that is to end single family zoning, triple density in the R5, R7 zones and assume that developers will make for everyone a wonderful place. This is the Densification RIP for the duped. For a while it was characterized as "the missing middle" but if applied most everywhere there is no middle. Appearing more recently is the term "filtered housing" meaning that the expensive new units will, as they decay, filter down to less affluent buyers. Or maybe it means that single family houses will be filtered out.

Portland has attempted to plan intelligently for its growth since the 1970s until recent years. That era of *neighborhood planning* resulted in notable success in stabilizing the existing streetcar neighborhoods, implementing community design standards, preservation and adaptive reuse, a

commitment to walkable and cycle friendly neighborhoods, improved public transit, and new higher density neighborhoods developed within the central city.

Added density around centers and "high capacity" transit corridors is a work in progress with district design standards at least an aspiration. The balance between providing a variety of housing types and encouraging a predominance of resident owners in the city has been essential for developing neighborhoods with a distinctively Portland sense of place and community. The rare corner attached duplex and recent increase in construction of the accessory dwelling has thus far provided a useful and relatively non-disruptive option for homeowners and renters. Despite pressures and constraints, Portland has the most affordable housing market of large west coast cities.

In contrast, the Densification RIP is carelessly disruptive not unlike the rush to skinny house lot divisions and the convoluted recognition of underlying lot lines. These strategies provided many neighborhoods with a street scape of curb cuts and driveways, over scaled houses, long skinny side yards, energy inefficient structures, and lots scrubbed of backyards and significant street trees. The existing "a" overlay with its density bonuses has been notably unsuccessful regardless of the market pressures so extending its reach may at best be unproductive. The other side of the RIP is an attempt to undo some of the damage.

As a parting thought, it may be time to consider this project in its digestible component parts:

- Needed reforms to improve the quality and clarity of the single dwelling zones R10 - R2.5 including illustrated single page representations of applicable standards (see Cincinnati's code and End Note 2).
- A mapping process to identify a new zone designation around centers and near high capacity transit corridors where a mix of smaller scale multi-dwelling housing *should* occur as a transition zone.
- Develop criteria for the mix of housing types that are appropriate to a transition zone. This may be a matter of reworking the R2 and R1 regulations.

With hopes that this project can result in positive outcomes, I have attempted to convey the concerns previously expressed by our neighborhood and from many other folks around the City.

Sincerely,



PS. The following are my personal recommendations.

[Specific Code Revisions Commentary](#)

Scale of Houses

- 1) **Using FAR as a measure of house size:** This is a *reasonable approach as is moves toward a form based code that allows greater flexibility to create distinctive neighborhoods. As applied it fails to address "one size does not fit all" guiding principal in the Comp Plan. Individual neighborhoods should be engaged in establishing what is appropriate.*

	<p>2) <b>Front setback:</b> Factoring neighborhood context is important. Increasing the default front setback to 15 feet is an improvement. Corner side yards need to be increased to 10 feet. However, the proposal favors the 10 foot front setback based on the presence of one adjacent property that may have been recently built. For existing neighborhoods averaging setbacks on both sides would be a simpler and more reasonable approach.</p> <p>3) <b>Stairs above grade:</b> Limiting number of above ground stairs to front entrance. Good approach but must include an associated maximum rise and run (7 rise to 11 run for primary entry should be the maximum, 6:12 the standard). This is a fundamental safety and “visit-ability” issue.</p> <p>4) <b>Accessible ADU:</b> This should apply to all free-standing ADUs not located above garages. No bonus ADUs.</p> <p>5) <b>Measuring height:</b> Measuring from the lowest (<i>instead of the highest</i>) grade around the house is desirable as is the change from 10 to 8 feet as a reset point.</p> <p>6) <b>Internal conversions:</b> Should require the retention of the original primary structure including front setback and entry façade during the creation of an internal ADU or internal conversion. Internal conversions should require design review to insure a minimum level of quality and to confirm that the existing shell with very limited additions or modifications to the façade are included. Otherwise internal conversions could easily pass as a Major Remodel.</p> <p>7) <b>Articulation of large street facing facades:</b> Reject. (This is already in the code for larger buildings, is abused by the application of multiple siding types, encourages front facades divorced from the rest of the house, and is unnecessary for the scale of structures under discussion for average sized lots.</p> <p>8) <b>Dormer Size:</b> Support the proposed redefinition of dormer size and application of roof height criteria.</p> <p>9) <b>FAR applied to basements:</b> Basements with wall area less than 3 feet above grade should not be included in FAR. (as proposed: area where basement walls are at least 4 feet below grade is addressing the problem in an inverted way)</p> <p>10) <b>Roof height:</b> Vary roof heights to correspond to lot size by allowing higher roof lines on larger lots with greater side setbacks. Limit roof height on a 5000sf lot to 25 feet with step ups to 32 feet for larger lots. (See RIPSAC 7 recommendation). Exception: If at least 50% of houses within 300 feet are taller than above limits allow houses to be up to 30 feet high.</p> <p>11) <b>Definitions:</b>  <b>Single Dwelling Zone</b> means a single dwelling on a single fee simple tax lot. This could be in the form of an individual house with ADU, a side by side attached duplex, or townhouse.</p> <p><b>ADU:</b> Maintain the integrity of the definition of Accessory Dwelling Unit as accessory to the primary structure – under a single fee simple ownership structure. Require deed restrictions to ensure that SDC subsidized ADUs are not used for short term rentals.</p>
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**Tri-plex:** A multi-family building type.

**Internal conversions:** internal remodel to provide an ADU or to add interior living units while preserving an historic resource in a higher density zone.

**Demolition:** Develop more clear and realistic definitions of “demolition” and “major remodel” to reflect a common sense understanding of these terms.

#### Housing Opportunities

- 1) **Maintain zoning consistent with the 2035 Comprehensive Plan zoning map.** Use overlays for plan districts and other types of design standards not for increasing density. Using overlays to redefine density and lot size in large areas of the city is simply abuse of the intent of zoning and ignoring the Comp Plan.
- 2) **Eliminate all rezoning of unconfirmed skinny lots in existing R5 zones.** Council made clear their objections to this in December. Ignoring this charge, BPS proposes to remap 50% of these lots as R2.5 but have effectively made *every lot a skinny lot* by allowing *duplexes everywhere*.
- 3) **Develop an update to the Comprehensive Plan** including a detailed mapping to create density transitions around centers and along corridors “where appropriate” that provide multi-family densities while retaining a large house and middle housing residential scale. Implement revisions to the R2.5, R1.8 (new), and R1 designations to support such practical, affordable, and attractive higher density housing. Requested detailed options requested by city council last December have been ignored.
- 4) **Detailed Map Options.** The multi-family density zones above should be mapped to extend about 200 to 600 walkable feet from transit stops ( where there are existing public transit with at least 20-minute frequency seven days a week) and about 400 to 800 walkable feet from designated centers with existing or planned urban amenities such as hospitality, retail and office space.
- 5) **Broader application of middle density housing must include a neighborhood planning process and neighborhood approval** (four of our 90 neighborhoods indicated support) *or* a thorough analysis to predict socio-economic, transportation, infrastructure, and environmental effects on the city including impacts on *demolitions, displacement, and destabilization*. A 5 year pilot project of a small area must be done to test the impacts of new code as part of the analysis before larger scale implementation is implemented.
- 6) **Develop strategies for building more complete neighborhoods in outer East Portland.** Given the street grid framework lot standards may need to be adjusted to accommodate a variety of densities. ZONE FOR CONTEXT.
- 7) **Design.** Other than scale, Community Design Standards are conspicuously absent. None in the HOOZ?
- 8) **Cluster Housing.** Cluster housing is already allowed and should be encouraged within density standards – i.e. not R1 density in the R7 zone. These should be explored before reworking the standards for Planned Development Review approval. Code guidance regarding FAR, height, number of units, building orientation to street and neighbors, open space, and lot size must be

included for cluster housing projects. This section seems written explicitly for one member of the PSC.

- 9) **R2.5.** Support minimum density requirements where major demolition is involved with conditions and exceptions noted. Require at least 2 units when new development is proposed on a 5000sf lot or larger in a R2.5 zone.
- 10) **On a lot adjacent to an improved and maintained alley**, require access from the alley when off street parking is proposed or required. (*Restrict width and frequency of driveways in the R2.5 zone.*)
- 11) **Require attached houses on lots of 25' wide or less.** Limit Height to 35 feet except where adjacent to R5 and additional side setbacks are included (existing code).
- 12) **Allow creation of a flag lot to meet density standards when the shell of the existing house is preserved with minor modifications allowed.** Restrict rear yard house height to 22 feet.

#### Historic Preservation

33.405 See End Note 3 below.

#### End Notes

**Note 1. Will the RIP produce more housing while maintaining scale compatible with of existing neighborhood housing?** The Residential Infill Project claims to limit home construction size to be compatible with the lot and neighboring structures. This is grossly misleading and here are some examples of why.

**First the rules:** Multiply the area of the lot by a factor of 50%. Then add the pop up basement (at least 4 feet in the ground), add attics with low ceilings and dormers space that will be excluded from the "limit".

**Example 1a:** On a lot with 5000 square feet, a house of 2500 square feet plus 1250 SF basement plus attic with dormers would result in salable living area of about 3000 SF plus a density bonus of 800 SF for an ADU. Few houses in Portland are 3800 square feet; fewer still are on 5000 square foot lots. Sure this is smaller than the potential 6000 SF house in the existing code but then no one wanted a 6000 SF house on a 5000 SF lot. And the large houses you see being built are generally well under this threshold.

**Example 1b:** On the same lot (everywhere in the HOOZ) a developer could construct a triplex. One of the units would have to be less than 800 SF but the other two units as above could be about 1500 SF each. No additional off-street parking would be required.

**Example 2:** On a 7500 square foot corner lot the basic allowable building size would be 3500 SF plus 1750 SF "basement" plus attic or about 700 SF. Total saleable area: Almost 6000 SF! This would allow a structure with 3 apartments averaging about 2000 square feet each. No additional off street parking would be required. (Everywhere in the HOOZ)

**Example 3:** On lots of 10,000 square feet "cluster housing is envisioned. In this case the developer would be required to propose a design that City Staff without a public hearing could approve. The size of the houses has no limit but for each "cluster house" an additional small 800 SF house would be allowed. Using the same size multiplier (.5 x 10000SF plus pop up 2500 SF basement plus about 1200 SF attic) Total saleable area for the cluster houses: 8700 SF! If there were 3 houses proposed each could be about 2900 SF and 3 cottages of 800 SF could be added for a total of 6 rental or condominium units on every 10,000 SF lot. NO additional off-street parking required.

End Note 2. R5 Base Standard, Draft v2.8 from the RIPSAC 7 report

Regulatory Ingredient	Variable	Existing Standard	Proposed Base Standard	"base standard" is the default standard for the zone
Density Maximum/Household		5000 SF	5000 SF	
Density Factor for subdivision		0.91	1.0	
Auxiliary DU Density Adjustment		1.5, auxiliary only	1.5, auxiliary only	Allows 2 living units under common title & tax lot. May not be sold as separate properties.
Lot size minimum		3000 (1600 corner)	4500 SF	Allowed for environmental offsets. Exceptions- condemnations, existing building permitted lots
Lot size maximum		8500 SF (new lots)	8500 SF (new lots)	N/A existing permit approved lots.
Corner Lot	V	1600 min	4500 minimum	
Floor Area Ratio	V	N/A	0.30 - .040 (?)	1500 SF - 2000 SF above ground for 5000 SF lot
ADU adjustment		N/A	0.10	For above ground: 500 sf for 5000 SF lot, up to 800 SF
Building Site Coverage	V	45%	25% to 40%(1level)	1250 SF, except 2000 SF for 1 level, footprint
Detached ADU in Rear yard bonus	V	N/A	300 SF	Additional site coverage
Rear yard garage bonus		N/A		Same increase as ADU but not additive.
Replacement of existing viable structures, historic resources	V	45%	Existing coverage PLUS 10%	Limited to the Base standard
<b>Roof Height</b>	V	30 feet	22	Varies with lot width, up to 32 feet for lots >90 wide. (option: average of adjacent houses)
Measure From	V	High point	Average finish grade 8' from front facing wall.	For sloping sites, TBD.
Measure To		Height measured to average height of main roof	Height measured to average height of highest roof	Includes dormer roofs greater than 50% of the length of the wall of the house below
Single pitch limits	V	6/12		
Pitch Limit	V	12/12		
<b>Set Back Dimensions</b>				
Front	V	10	20	May be reduced to average of adjacent houses
Rear	V	5	20	Detached adu's 5', min 3 feet for 1 level ADU or garage.
Side	V	5	AVG 7.5 Increase for larger lots	Exception: Minimum 3' for bay or bump out and for one level ADU or garage with up to 10 high sidewall.
Corner	V	5	10	
Zero Side	V	Limited	TBD	Allowed for common wall shared line (duplex) w/ M.A.
Zero Rear	V	Limited	TBD	Fire rated wall assembly. Limited height. Shared M.A.
Other side setback	V	Adjoining MF or Zones	TBD	Non-articulated Sidewall > TBD

REGULATORY INGREDIENT		EXISTING STANDARD	PROPOSED BASE STANDARD	"base standard" is the default standard for the zone
<b>Street Front standards</b>				
Main Entry Door Threshold Elevation	V	48 inches CDS	48 inches	48 inches above grade measured from a point 96 inches toward the sidewalk from entry porch landing
Main Entry stair Pitch	V	8/9 Building code	6" Rise, 12"Run	This provides safe exterior stairs for all users
Main Entry Covered Porch	V	6 x 4??	6 x 4??	This provides a weather protected entry area
Main entry facing Street or porch	V	Required	Required	This provides a visual connection between the street and entry.
Garage Wall Setback	V	Align or Behind plane of main front wall	Align or Behind plane of main front wall	Anti-snoot house regulation. Exceptions for steep slope. More stringent standard for some neighborhoods.
Attached Garage Width Maximum		40% Of street facing wall	12 feet above basement level within 30 of front property line	The intent is to encourage tuck under or side or rear yard garages.(currently allows 14 for 35 Wide)
Garage Door Width less than 50 feet from front lot line	V	N/A	9 feet maximum	No limit on rear yard, consider limit on corner side lot access.
<b>Site Standards</b>				
Lot Frontage Minimum		35/25 Feet	45 Feet	Front and Minimum widths are separate
Allowable Driveway slope		PBOT	TBD	Allow steeper down and minimize upslope
Driveway width on property	V	40% of front yard	25% of front yard	Allows 12.5 wide for 50 foot lot
Required Front Yard Landscape	V	60% Front Yard	75%	Matches reduced driveway standards
Driveway width@ property line	V	20/25/30, 9 min, PBOT	18% of frontage max, 8 min	Allows 9.0 wide for 50 foot lot (18' for shared)
Shared Driveway width, front property line	V	As above, PBOT	12	Limits curb cut width
Driveway Curb Cut Frequency	V	PBOT	One per lot	
Required Off Street Parking		9 x18 Pad	9 x18 Pad	
Required Street Trees		One/30 LF	One/30 LF	
Undergrounding of OHW Service	V	N/A	For new construction	This reduces conflict with street trees and visual clutter
Sidewalk and Planting Zone		Mostly, PBOT	Required	Add to zoning code. This is owner responsibility
<b>Architectural Features</b>				
Roof Eave Setback Intrusion		20% of set back	Minimum 24 inches	
Window Proportions and trim	V	CDS		
Siding	V	CDS		
<b>Cornice standards</b>				

	<p><b><u>End Note 3. PCHR COMMENTS TO BPS ON 33.405.070 “ADDITIONAL REGULATIONS FOR HISTORIC RESOURCES”.</u></b></p> <p>-</p> <ol style="list-style-type: none"> <li>1. As a general matter, it should be unambiguous that all existing requirements for Historic Resource Review remain effective and shall supersede 33.405.070. In other words, if HRR is otherwise required (e.g. Historic Landmark, contributing structure in historic district, etc.), it should be clear that 33.405.070 may not provide an alternative regulatory path to bypass HRR and the application of 33.846.060(G), district-specific design guidelines, or Community Design Standards, or to permit alterations not approved through HRR. <i>Reason: need to avoid ambiguity or create a loophole to evade HRR. Consider clarifying language similar to 33.445.610 (“The building may be expanded and the new net building area used for additional dwelling units only if the expansion is approved through historic resource review.”),</i></li> <li>2. It should be clear that this regulation applies only to historic resources within in the HOOZ ‘a’ overlay. <i>Reason: in areas deemed unsuitable for the HOOZ, there is no reason to allow density in historic resources at levels deemed unsuitable for the rest of the neighborhood (unless the provisions of 33.445.610 apply, including covenant).</i></li> <li>3. Subpart C.1. This subpart potentially conflicts with Goal 5’s prohibition of demolition of historic resources and definition of “demolition”: “(a) “Demolition” means any act that destroys, removes, or relocates, in whole or part, a significant historic resource such that its historic, cultural, or architectural character and significance is lost. This definition applies directly to local land use decisions regarding a National Register Resource. This definition applies directly to other local land use decisions regarding a historic resource unless the local comprehensive plan or land use regulations contain a different definition.” Note that in some cases the Goal 5 Rules apply although HRR does not, e.g. when a full program of historic resource review has not yet been applied to a newly-listed National Register district or property.</li> <li>4. Subpart C.1.b. The street-facing exterior wall (facade) should not be replaced. Any addition should be set back at least 15 feet from the facade. The 50% constraint should be applicable to the side and rear exterior walls. <i>Reason: preserving the facade is critical for historic resources.</i></li> <li>5. Subpart C.3 and 4. It should be clear that the size and scale of converted historic resources must be approved by HRR when applicable; Table 405-2 may not supersede HRR. <i>Reason: The size and scale allowable by HRR may or may not comply with Table 405-2. In areas with existing large houses, FAR in excess of Table 405-2 limits may be appropriate. In other areas, compatibility requirements may dictate FAR less than Table 405-2 limits. Subpart C.3 should apply only when HRR does not, e.g. to HRI ranked properties or to Local or Historic Conservation Landmarks which are being processed through Community Design Standards.</i></li> <li>6. Subpart C.5. Visitability requirements should not apply to dwelling units contained within the original structure, or to an ADU added above a garage. <i>Reason: consistency with 33.405.060.C.3. It may often be impracticable to create visitable dwelling units internal to an existing structure (e.g. internal ADU or internal duplex/triplex conversion). If dwelling units are created via addition or detached ground-level ADU, visitability is a reasonable requirement.</i></li> <li>7. Subpart C.6: No additional off-street parking is required, but the existing number of off-street parking spaces must be retained. <i>Reason: consistency with 33.445.610. Also, given the proposed change to C.1.b and the existing ADU rules which prohibit front-yard ADUs, there will be no good reason to remove driveways from the street to a point 15 feet behind the facade.</i></li> <li>8. FINALLY: among the group of PCHR members, many of whom are very familiar with applicable code, there was uncertainty about the intended effect of 33.405.070 and its interaction or conflict with existing code and Goal 5 Rules. We invite BPS staff working on this section of the Residential Infill Project code drafting to meet with PCHR for further discussion and clarification.</li> </ol>
11/30	<p>Hi Morgan,</p> <p>Attached, please find my individual comments on the RIP discussion draft. I’ll also be sending a joint letter related specifically to attached homes and cottage clusters a little later on.</p> <p>[Attachment content follows:]</p>

November 30, 2017

City of Portland Bureau of Planning and Sustainability  
Attn: Morgan Tracy  
Residential Infill Project  
1900 SW 4<sup>th</sup> Avenue, Suite 7100  
Portland, OR 97201

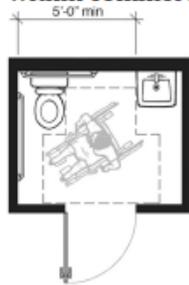
Re: Comments on the Residential Infill Project Discussion Draft

Dear Mr. Tracy:

Thank you for all your work on the Residential Infill Project. Attached, please find my comments on the Discussion Draft. Please let this batch of comments (and a separate letter I've signed on to) serve as my official comments, taking precedent over earlier iterations shared with you previously:

- (1) For presentation purposes, it would be helpful to indicate with an additional color (or colors to distinguish R10, R7, R5...) the portions of the map that are currently shown as white that are residentially zoned. Otherwise, it's difficult to tell how much property that falls outside both the existing and proposed "a" overlays is zoned for single dwelling use.
- (2) Cottage Clusters. Portland should adopt a genuine cottage cluster code – which provides a density bonus for smaller homes (allowing either via a planned development or a subdivision). Please see separate testimony from me and both for-profit and non-profit builders with specific suggestions to expand this option beyond what is currently proposed in the Discussion Draft.
- (3) Density calculations should be performed before subtracting land area lost to Right-of-Way dedications, as is being contemplated in the 'Better Housing by Design' update for multi-dwelling zones.
- (4) Allow properties with ADUs to host Type B home occupations and strike the limit on the number of residents in primary dwelling + ADU combinations.
- (5) Make whatever modifications may be required to Title 33 to allow for legal occupation of tiny homes on residential lots (acknowledging that other changes would also be required to the Property Maintenance code)
- (6) For corner plexes and mid-block duplexes, mimic Portland's existing corner lot duplex provision so builders can insert property lines between attached homes. FAR limits and other constraints would still apply, and use of this provision would preclude getting an ADU as well. Please see separate testimony with specific language suggestions. that the builder can either construct a duplex or 2 attached homes (each with their own lot), subject to FAR and other constraints. Use of this provision would preclude getting an ADU on the property (as is currently the case with corner duplexes).
- (7) Drop off-street parking requirement in all SF zones. Consider requiring developers to sign a 'waiver of remonstrance' if they exercise this option so their property becomes an automatic 'yes' vote should a parking district be proposed that includes the subject property in the future.
- (8) Allow "a" overlay provisions for properties on unimproved streets.

- (9) Allow any combination of internal and external ADUs (capped at 2 total). I recognize that building codes and economics point naturally in the direction of 1 internal and 1 detached. But if someone wants to have 2 internal ADUs - and can do so within FAR constraints - why not let them? And if someone can fit 2 detached structures on their property without tripping over the caps on FAR, detached accessory structure size limits, and lot coverage standards, why not let them do so?
- (10) Allow historic internal conversions anywhere in the city, not just in the "a" overlay. Expand the list of eligible structures to any home built before 1945.
- (11) In situations where a single home sits on a lot where the base zoning allows for 1 or more additional homes, allow more homes with a minimal (Type Ix?) land use process. This would make it more feasible to bring under-developed properties up to base levels of density - where currently property owners would need to go through a subdivision process and/or a Type II or III planned development process.
- (12) Require one unit be affordable, not all of them, for a project to qualify for the affordable housing bonus. Provide an FAR bonus for family sized homes using this bonus.
- (13) Consider applying minimum density to R5 as well (e.g. not just to R2.5) so people can't do a 1-for-1 replacement of a house on a 100'x100' lot within R5.
- (14) Consider loosening lot remnant standards (currently 36' min. width and 3,000sf min. area to be developable)
- (15) Allow heights of shed roofs to be measured to mid-point of shed if the low point of the shed roof is closest to the relevant property line and the high point of the shed is at least twice the legal setback from any other site property line. Similarly, allow sheds heights to be measured to mid-point in attached house situations where a property line cuts through the middle of a gable roof.
- (16) Only apply housing compatibility requirements (e.g. corner and midblock duplexes, detached ADUs), increased street setbacks and reduced height limits to portions of the city with the "a" overlay (if it isn't going to be city-wide, which would be my preference)
- (17) Consider shifting some things that are allowed just within the "a" overlay to be allowed city-wide. I'm not sure what would be on that list yet. But this could be a fairly easy way to preserve the "a" overlay while expanding the list of things that could happen anywhere.
- (18) For ground floor visitability, allow alternatives to the full 60" bathroom circle found within commercial building ADA standards.



- (19) The language to allow 2' eaves provides an exception in cases where the eave would be 3' from a property line. This doesn't account for situations where the setback is 0' (e.g. alleys or zero-lot-line development). Add language stating that if a setback is 0', the eaves can go right up to the property line.

	<p>(20) For PDs where multiple homes will share a single lot, provide an alternative maximum building coverage that is the greater of Table 110-4 or 35% of lot area. Otherwise, adjustments are almost always needed (and granted) in these situations.</p> <p>(21) Covered porches. Only require covered porches for ADUs if they'd also be required for primary dwellings. I can't think of a public policy argument for creating a double standard on this, with an ADU requiring something that wouldn't be required for the main house.</p> <p>(22) Drop the cap at 9 attached homes in R2.5 zone. I don't think it's a big problem to have a whole block face of townhomes – and unlikely to arise due to the challenge of assembling land for such a development. But many close in urban neighborhoods in other cities are built almost exclusively that way – and it works out just fine.</p> <p>(23) In the mini-flag lot code, provide an exception to the 5' setback for property edges abutting alleys (p. 77)</p> <p>(24) Why aren't triplexes added to p. 86-87?</p> <p>(25) Drop requirement that main entrances on corner plexes face different streets and that homes with internal ADUs can only have one door facing the street (unless a second one had existed prior to conversion). There are plenty of homes in established neighborhoods (including expensive ones like Ladd's Addition) where 2 doors on a main house or duplex face the street – and this doesn't seem to negatively impact the neighborhood.</p> <p>(26) There's a note that a corner triplex can only happen w/ adjustment to the base zone (p. 127). I'm not sure how to interpret this.</p> <p>(27) If 'accessible route' means ADA-accessible, this could be a problem for internal circulation on larger sites. Requiring the main path to meet this standard is reasonable. But sometimes it's not practical to connect the main path to each front door without exceeding 5% grade, even on fairly flat sites. (p. 183)</p> <p>(28) Make 33.854.310 F.2. (50% of homes face open area) apply to cottage clusters (receiving a density bonus for smaller homes), but not to every PD that includes detached single dwelling units.</p> <p>I know it's going to be a lot of work to comb through all the feedback you receive. Thank you for your consideration on these items!</p>
11/30	<p>To Whom It May Concern,</p> <p>As a long-time resident of Portland and advocate of keeping housing costs low in the city, I strongly support re-legalizing "missing middle" housing in as much of Portland as possible, including duplexes, corner triplexes, internal division of historic homes and cottage clusters. Reducing the size of new houses is a thoughtful compromise for reducing demolition, especially one-for-one demolitions that only accelerate displacement.</p> <p>More missing middle housing will be viable if the city waives on-site parking requirements near transit. Garages should be legal but not mandatory, especially since every driveway removes an otherwise good curbside space and, potentially, a tree.</p>
11/30	<p>Dear Portland Bureau of Planning &amp; Sustainability,</p> <p>Thank you so much for your work on the Residential Infill Project! I'm proud to live in a city that is thinking so carefully about the best ways to provide affordable, safe, and aesthetically pleasing housing to meet our urgent housing needs now and for a long time to come.</p> <p>I am the owner of a small business called Niche Consulting, which focuses on sustainable design consulting with an emphasis on small homes. I'm also a homeowner in the Cully</p>

Neighborhood and a member of the Build Small Coalition. Over the past several years I've had the opportunity to work on dozens of small housing projects. I'm writing today in support of the amendments to the Discussion Draft of the Residential Infill Project provided by Portland for Everyone.

In particular, I want to emphasize my support for the following:

1. Allow the "housing opportunity" provisions in all areas of the city.
  1. Neighborhoods like Cully where were live should also benefit from the opportunities in this discussion draft. I completely respect the city's concerns about displacement and I am a huge proponent of the anti-displacement work happening in our neighborhood, but it seems that increasing economic opportunity for renters and owners in our neighborhood would go a great deal further than limiting possibilities.
  2. I worry that if we exclude neighborhoods like Cully with large lots which could accept additional density (thereby making our neighborhood more lively, support local business, and provide increased transit ridership) will do more harm than good in our neighborhood. Our street grid is less connected than other neighborhoods so increasing density, providing more small housing options, and increasing transit access are great ways to support opportunities for our low-income neighbors.
  3. We also have a large number of extended families in our neighborhood and these friends and neighbors would benefit from many of the provisions of the opportunity zone.
  4. Finally, the large lots in our neighborhood have already proven a great opportunity for cottage clusters and we could benefit from more of them. The intermixing of household types in our neighborhood is one of my favorite aspects of living here!
2. Continue to refine the Cottage Cluster code to enable our city to develop more Missing Middle housing.
  1. My thesis research explored how the layout of intentional communities impacted community relationships and resource sharing. I strongly believe that a strong cottage cluster code will go a long way towards supporting our city's equity and livability goals.
  2. Cottage clusters are a great option for increasing density without dramatically changing neighborhood character. They are particularly beneficial in neighborhoods with a disconnected street grid (like Cully and much of East Portland) because they may provide amenities close to home that residents wouldn't be able to afford on a household level (such as a common house, office space, etc.)
  3. Cottage clusters can preserve existing old trees, create community connections, and provide access to shared amenities in the form of both green spaces and built common spaces.
  4. As Portland for Everyone suggests, we can look to other cities like Langley that have addressed cottage cluster regulations thoughtfully.
  5. A subdivision approach could also encourage development of cottage clusters because many developers would rather do fee-simple ownership than condominium associations.

	<p>6. I also strongly support Portland for Everyone's recommendations for cottage clusters allowing density bonuses for small units (when people have shared amenities they don't need as much private space) and a density bonus for accessibility.</p> <p>Thank you again for your consideration and all the work you do! The Residential Infill Project will provide more starter homes (for millennials just getting into the housing market) and stopper homes ("forever homes" for retirees leaving the workforce and figuring out how to make their fixed incomes address housing stability). I look forward to seeing these measures enacted and to watching the ripple effect as other cities follow our lead as they have on transportation and are now starting to do with support for Accessory Dwelling Units. Let's keep leading the way!</p>
11/30	<p>There is clear cut proof that individuals who stand to gain millions nab seats on stakeholder advisory committees and then vote in their own financial interest. Take a look at the members of the Residential Infill Project Stakeholders Advisory Committee - 4 known developers, 2 lobbyists for the Oregon Home Builder's Association and Deputy Director and Chief Lobbyist for 1000 Friends of Oregon, Mary Kyle McCurdy who had made it clear that she stands in lockstep with the Oregon Home Builders when she and her buddy John Chambers hijacked the House Bill 2007 this past legislative session.</p> <p>As resident and tax payer of Portland, Oregon I DEMAND that there is full transparency and RECUSALS for individuals and entities that stand to gain financially by influencing the outcome of an advisory committee/board. It is ILLEGAL in San Diego, San Francisco, Seattle, and Los Angeles - WHY? Because it's clear that areas with a ton of development potential should not be influenced by the very people that stand to gain the most WEALTH!! We see what is happening to our beautiful City while Developers are allowed to continually destroy and demolish the character, beauty and affordability of our homes and neighborhoods.</p> <p>I am a LIFELONG / THIRD GENERATION PORTLAND RESIDENT. I live at [redacted] SE 34th Ave Portland, Oregon – AND JUST PAID ALMOST 12K in Property Taxes !!!</p> <p>BE HONEST PEOPLE !!!!!!!!!!!!!!!!!!!!!!!</p>
11/30	<p>I live in Cully at [redacted] ne 72nd ave. My house is very close to transit, next door to commercially zoned property, basically across the street from homes that are in the overlay, and yet still we are excluded. My understanding is this means we will get the reduction in what we are allowed to do with our land that comes with the RIP changes but not the benefits that come with the overlay. My view is that all of cully should be included in the overlay if the RIP moves forward.</p>
11/30	<p>Hello,</p> <p>Please find my comments on specific aspects of the RIP Draft attached. I appreciate all of the work Planning Staff has put into this process and fully support the RIP project.</p> <p>[Follow up email, received 11/30:]</p> <p>Hello,</p>

	<p>I have made a few revisions and edited the formatting of my RIP Comment document.</p> <p>If possible, please use the attached PDF in place of the file I sent earlier today.</p> <p>[Attachment content follows:]</p>
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## SCALE OF HOUSES

### 1. Limit the size of houses while maintaining flexibility (R7, R5, and R2.5 zones).

I fully support the intention to limit the massing of homes, and agree with the move to an FAR based system. I am concerned with the lack of code language to address the unintended penalty on energy efficient homes that are insulated beyond code requirements and therefore have thickened walls.

The proposed FAR code language discussed in 33.110.215 and further defined in 33.910.030 limits the size of homes on a given lot based on measurements to the exterior face of walls. The **Living Area** of a home is the area within the interior face of the walls. In the proposed language, for a given lot, a home built to the code-minimum insulation level would be allowed more Living Area, than a highly-efficient home with thickened exterior walls.

At first look, it may sound like a minor impact, but looking into the numbers, it is in fact quite significant. A quick case-study illustrates the impact:

- SFR on a 5,000 Square Foot R5 zoned lot. Proposed FAR would allow 2,500 SF of Floor Area.
- Assuming a two story, 40' by 31.25' rectangular footprint = 285 Linear Feet of exterior wall.
- Code-minimum insulation home with 7" thick walls = 2,334 SF of Living Area
- Super-Insulated Efficient home with 12" thick walls = 2,215 SF of Living Area
- **Living Area Penalty for Super-Insulate House = 119 SF (~1 Bedroom)**

Without including language to address this issues, the FAR definition would introduce a strong deterrent to energy efficiency in the affected Zones. Given the new limits, along with new options for multiple units, many project will undoubtedly be design and built to maximize the allowable FAR and resulting Floor Area. A secondary affect is that the language would promote the use of insulation materials with a higher R-Value per inch (foams), which tend to have a large environmental footprint than those with lower R-Value per inch (cellulose, fiberglass, etc.).

The good news is, this issue can be addressed, and has been addressed in other jurisdictions. Building Code in Vancouver, British Columbia, includes language to allow exemption of the portion of wall thickness added to insulate beyond code levels (See, Floor Space Exclusion to Accommodate Improved Building Performance). A slight variation would be to calculate the exclusion based on the total thickness of insulation materials provided (perhaps with a minimum R/inch to define what counts as insulation), and subtract a typical thickness of insulation that would meet code (5-1/2").

### 2. Revise how height is measured (all zones).

Similar to the discussion above, height limits can penalize well-insulated homes with raised-heel trusses. It would be great to address this also if possible.

3. Improve front setbacks to better reflect those of adjacent houses (R7, R5 and R2.5 zones).

I support this change.

4. Improve building design (R10, R7, R5 and R2.5 zones).

Overall, I support the changed in this section. The one piece that concerns me is the unintended consequences of limiting the front entry stairs by the **number of risers**. I feel it would be more appropriate to limit by **overall height**. Limiting by riser will incentivize more structures to be built with the maximum allowable riser height. Limiting by height would have the same overall affect, but allows for more gentle entry stairs.

#### HOUSING OPPORTUNITY

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5. Create a new Additional Housing Opportunity overlay zone – the new ‘a’ overlay zone.
  - I strongly support the move to allow more housing units per lot. I would prefer to see more options for allowed types.
  - I do not think the requirement for one of the ADUs to be attached and one detaches is helpful.
    - Structures being attached and detached can be gamed. I would prefer to see a limit by number of units, with massing limited by FAR, setbacks, and height limits.
    - Conflicts with affordability and durability goals. Sometime building detached can be easier than trying to tie in – existing roof may slope toward only area to attach.
  - If keeping the attached requirement, add an additional option for a detached two-unit ADU “duplex”. As in, two attached ADUs detached from the main house.
  - The requirement for the size of the second ADU to be based on the smaller of two duplex units sets up a perverse incentive for the duplex to be larger than needed.
    - Creates perverse incentive to make first ADU larger than needed, rather than two “right-sized” units.
  - I support allowing triplexes on all lots, not only corner lots. It is a more efficient type of housing and with the FAR limit, would not have a negative impact on the neighborhood feel.
6. Apply the new ‘a’ overlay zone in select areas.
  - I believe that this change should be City wide.
  - If not, at least expand the distance from Max stations to ½ mile – these should be the focus of density and are more likely to be developed.
7. Provide incentives for affordable housing and historic preservation (new ‘a’ overlay zone).
  - I like this. \*Review affordability and development case
8. Encourage more cottage cluster development (all single-dwelling zones).
  - I think that this is headed in the right direction and would love to see some form of cottage clusters allowed in the Zoning Code without a Design Review.

	<p><u>NARROW LOTS</u></p> <ol style="list-style-type: none"> <li>9. Rezone some historically narrow lots from R5 to R2.5.</li> <li>10. Revise rules for all narrow lots (less than 36 feet wide).</li> <li>11. Revise rules for parking and garages on all narrow lots (less than 36 feet wide).</li> <li>12. Make improvements to the R2.5 zone. <ul style="list-style-type: none"> <li>• Where no parking is required on site, reduce minimum flag pole width to 3' or 5' <ul style="list-style-type: none"> <li>○ Many existing houses would be built up to 5' set back.</li> <li>○ There is plenty of room for access to flag portion of lot and may be better aesthetically than large empty pole.</li> <li>○ Fire access would still have to be met, 150' to furthest point on structure.</li> </ul> </li> </ul> </li> </ol>
11/30	<p>I don't like having a big front yard and would far prefer to have a 10 foot setback in front and to have an additional 5 feet of depth in my backyard. I see no reason to increase the setback for homes from 10 to 15 feet. Please remove this provision from the RIP.</p>
11/30	<p>Morgan,</p> <p>I am not prepared to offer specific input on code language at this time but I do want to raise a critical global issue with regard to potential impacts on urban forest canopy. Last year City Council approved the Residential Infill Project Concept Report, but with a caveat that tree preservation, open space, and reduction of impervious surfaces be addressed. The following BPS article specified those amendments from Commissioner Fritz:</p> <p>With some fine-tuning, City Council approves Residential Infill Project Concept Report  On December 7, 2016, City Council voted unanimously to approve a resolution that accepted the Residential Infill Project Concept Report with several amendments: Council approved several amendments introduced by Commissioner Fritz that address flexibility for tree preservation, increasing private open space areas, and reducing impervious surfaces.</p> <p>Commissioner Fritz's amendment read as follows: 3rd Amendment (Commissioner Fritz)  AMEND WITH: a) Increase minimum front setback by 5 feet; provide an exception to reduce setback to match existing, immediately adjacent house. e. Allow flexibility if tree retention is a consideration.</p> <p>In reading the proposed code language it doesn't look to me that the tree issue has been adequately addressed. I know from talking with folks in the "tree community" there is considerable concern about this issue and would want to see those concerns and suggested code language addressed.</p>
12/2	<p>Hi Morgan and Julia,</p> <p>I regret that I missed the deadline for commenting on the Residential Infill Project draft documents, so am sending this email as an overall comment and voice of support for the proposal.</p> <p>I am a 21-year resident of Portland. Over the years I have lived in NW, NE, and SE; in apartments, duplexes, a very small house, and now in a larger home in Eastmoreland. When I was the Planning Director of Milwaukie, I led a similar project to revise residential</p>

	<p>development and design standards, which were adopted in 2012. So, I am deeply familiar with the issues and solutions you have tackled in this project: scale, typology, and context-sensitive housing design.</p> <p>The draft proposal successfully strikes a balance between increasing the range of housing options in our neighborhoods, with addressing issues of scale and urban design. I wanted to voice my support for the proposal, specifically the following aspects:</p> <ul style="list-style-type: none"> <li>• use of FAR to shape the form and height of new structures</li> <li>• allowing eaves, a critical design feature, to project into setbacks</li> <li>• increasing allowance of ADUs, cottage clusters, and bonus units within 'a' zones</li> <li>• allowing use of historically narrow lots</li> <li>• elimination of the off-street parking requirement for new structures on narrow lots</li> </ul> <p>I strongly support the City's efforts to expand the range of housing choices in all neighborhoods, including lower density neighborhoods such as Eastmoreland. This proposed package of amendments mitigates risks to neighborhood design while allowing a wider diversity of people to enjoy living in all of our neighborhoods.</p> <p>Thank you for your diligent work!</p> <p>Respectfully,</p> <p>SE 27th Ave., Portland</p>
12/3	<p>I am writing to provide my feedback on the Residential Infill Project (RIP) Summary.</p> <p>I am in full support of the Irvington Community Association's (ICA) feedback on the RIP.</p> <p><a href="https://www.irvingtonpdx.com/residential-infill-project/">https://www.irvingtonpdx.com/residential-infill-project/</a></p> <p>As a Portland resident to be impacted by this proposed zoning change, I am extremely concerned about the Planning &amp; Sustainability's desired destruction of all single-family residences in the greater Portland area with replacement of only large multi-family units or ADUs allowed to be much bigger than existing structures. I live with my family in the Portland area for it's walkability, livability and environmental stewardship. This proposal goes against all of those ideas.</p> <p>Please continue to work on improving the transportation and infrastructure of our currently underserved neighborhoods by your department (especially further out in East Portland) as the ICA recommends to provide for the increased population growth you anticipate while improving equity within our community.</p> <p>NE 26th Ave., Portland, OR</p>

## Letters

The seven letters staff received via mail are shown below with personal information redacted.

As a long time Portland resident, I am very concerned with the RIP initiated by City leaders. Unfortunately the RIP, with its focus on duplexes, triplexes, fourplexes, etc., changes the intent and character of eastside neighborhoods. It shows a lack of respect for the history and the families of the eastside. It also unfairly targets eastside neighborhoods.

The eastside neighborhoods were carefully and thoughtfully planned with a variety of old-growth (Timber) homes, beautiful yards, lofty trees, winding streets, and set back houses and garages. These neighborhoods were designed with the family unit in mind. Most schools are within walking distance and the family community has provided lots of school / neighborhood friendships. Both front + backyards were designed to be conducive to swing sets, water slides, bouncy houses, various lawn games, and family + neighborhood barbecues. The houses were also designed to have common set backs to allow neighbors to visit with one another and to keep an eye on the children playing down the street.

Home ownership encourages long term commitments. This commitment creates stability and a greater sense of community. Single family dwellings in eastside neighborhoods have been the backbone of the City of Portland. These residents pay property taxes and vote to pass school, library, zoo, & community services bonds. Families want their children to attend good schools and are concerned about the environment in which they live. Efforts & support from eastside residents have been integral to Portland being classified as a "beautiful" and "livable" city.

Recent efforts to amend R.P. by increasing building set backs a bit are appreciated, but still do not exemplify good planning. Many houses on the eastside have much longer set backs. The new set back of 15 ft. would still block the view of the neighbors and not make for a cohesive looking neighborhood. It is also hoped the backyards provide more than 15 ft. of space as it can significantly alter a family's or children's activities. Of note: At a meeting with a city planner, I questioned the much smaller yards presented in the R.P. I asked, "Where will the children play?" I was told, "Tell them to play in the street." This is far too dangerous for children and an unacceptable answer.

The prediction of smaller families is inconsequential. If a family oriented neighborhood is safe + close to schools, families will want to live there. Families want to be with other families. If the RIP turns the neighborhoods into mostly small rentals + many without families, the chances are slim other families will want to live there. Even the RIP, families may feel more welcome in places like West Linn or Oregon City. Once again, it won't be that there aren't any families, it will just be that families won't want to live in RIP neighborhoods. Question: In the future, what will this do to eastside Portland schools + test scores? Something important to think about!

Rezoning issues deteriorates livability by discouraging long-term community commitments due to destruction of homes and replacement by rental units. In addition, the reduction of green spaces (front + backyards) and the increase of cars and traffic decrease livability not only for the neighborhoods but for all of Portland.

Question: Why so many rental units when so many Portlanders have been priced out of them? City officials' duty should be to them, before new move-ins.

My message to City leaders:  
Remember Albina. The displacement  
of families in that area has not  
been looked upon favorably.

Right now the displacement of  
mostly eastside families is what  
is being promoted in the RIP.  
The project offers very little in the  
way of affordable housing and  
destroys historic, well-planned  
neighborhoods in the process. Change  
for the sake of profit rather than  
for the common good appears to  
be the goal. This project does not  
make Portland better; just  
more populated, more congested,  
and overall less livable.  
For shame!

You can do better.

Please channel Tom McCall  
who truly understood how to make  
our city and state "beautiful."

Think about how + why he is remembered.

Will you fare as well?

Sincerely  
A concerned Portland resident



November 13, 2017

City of Portland,  
Bureau of Planning and Sustainability  
Attn: Residential Infill Project  
1900 SW 4th Avenue, Suite 7100  
Portland, Oregon 97201

RECEIVED  
PLANNING & SUSTAINABILITY  
2017 NOV 17 P 12:09

We are the Land Use Committee Chairs for the Collins View Neighborhood Association. However, because the Board has not voted to approve the following, it should be considered our own comments.

Much of Collins View is not suitable for increased population density, whether in base dwelling units or accessory dwelling units due to the nature of the area and lack of infrastructure.

Collins View and much of the surrounding part of SW Portland is forested with mature trees. Most of the streets are substandard without sidewalks. Many are narrow with curves and hills and have little space for on-street parking. Many are not paved or are only platted. Public transit service is very limited. There are many wetlands, streams and valleys with environmentally protected areas. Services and grocery stores are often at a considerable distance.

if population density is to be added through planned developments, the following mandatory criteria, for approval, similar those in the "a overlay "should be required:

- The development must be on a city maintained street with continuous sidewalks to a frequent service transit line not over 1/4 mile away.
- If grocery stores and other services are not within 1/4 mile, one parking space must be provided for each living unit, including accessory dwelling units.
- All mature trees must be retained.



11-27-17

In regard to the infill housing, the southeast area is being destroyed by these skinny houses. We already have 3 on S. y. Malden St with others being built & blocks away.

Our residential homes are suffering as a result of the greedy planning department for skinny houses. Our sunlight and air have been suffering as a result. Please put a stop to skinny houses in the S. y. area.

Thank you,



November 30, 2017

To: City of Portland Bureau of Planning and Sustainability  
Attn: Residential Infill Project  
1900 SW 4<sup>th</sup> Avenue, Suite 7100  
Portland, Oregon 97201



Re: COMMENTS re: RESIDENTIAL INFILL PROJECT, DISCUSSION DRAFT; OCTOBER, 2017

#### INTRODUCTORY REMARKS

While I know that the City and the BPS are looking for feedback on specific proposals in the Discussion Draft, it is important that the City and BPS receive feedback and input on the general direction of the RIP before getting into specifics.

- The RIP suffers from shifting goals and priorities. Its original intent was to reduce the number of demolitions and their replacement with overly large houses. But from the outset, the BPS priority was to manage growth and increase density in single dwelling zones through predetermined outcomes. Late in the process, affordability and displacement became additional foci.
- The Draft Proposal fails to follow the goals and policies of the 2035 Comprehensive Plan. It's one-size-fits-all approach does not focus growth around centers, fails to address district and neighborhood identity, fails to protect neighborhood diversity, and does not acknowledge their historical assets.
- The Draft Proposal allows greater density in the R5 single dwelling zone than in the R2 multifamily zone.
- The Draft Proposal fails to follow the direction of the City Council, December, 2016. It does not directly create more deterrents to demolition, does not provide options for a housing opportunity overlay zone map, in some cases does not address transportation infrastructure constraints, changes zoning to allow historically narrow lots to be built on, and does not provide for smaller size houses inside the housing opportunity zone.
- There has been **insufficient analysis of the proposals** to project outcomes, immediate and over time, and identification of potential unanticipated consequences.
  - Will the RIP result in more or less affordable housing?
  - Will it reduce the number of demolitions?
  - Will it shift demolitions from more affluent areas to neighborhoods of smaller, more affordable houses both inside and outside the overlay?

- Will demolitions cause displacement? Who will be displaced, owners or renters? Will RIP make Portland a city for all, or will the economically disadvantaged and minorities continue to be forced to distant suburbs?
- Will housing shift from owner occupied to investor owned properties? Will this affect neighborhood stability?
- Will housing choice be reduced for those of lower income, especially renters?

Without answers to these and other questions, we don't know if the goals of the Residential Infill Project will be achievable.

## SCALE OF HOUSES

While limiting the scale of houses is a step in the right direction, one-size-fits-all will lead to shifts in development pressures. Communities of larger homes will receive less pressure for demolition and development. Demolition will shift to areas of smaller more affordable houses where a smaller house can still yield a profit. This will result in even more displacement of the most housing vulnerable, especially renters. Housing choices will be reduced. Portland will not be an equitable city.

Floor area ratio: A floor area of 0.5 to 1.0 not to exceed 2500 square feet (R5) is reasonable in many neighborhoods, however it will put increased demolition pressures on areas of smaller homes. The appropriate FAR should be established on a neighborhood pattern basis.

Measurement of FAR: Include All habitable space in the FAR. In addition to the main floor and second floor, include basements extending more than two feet above grade and finished attics higher than 80 inches. Not including basements and attics could easily result in houses with over 3200 square feet of habitable space.

Front setback: Many Portland neighborhoods have setbacks of twenty to twenty-five feet. The front setback should be determined by the average of the two adjacent houses. This is an easy standard to implement and will help maintain the streetscape and public space.

Height: Measuring height from the lowest grade is a very positive move. Do not allow enhancement of the grade.

Roof height: Allow a maximum roof height of 25 feet (to midpoint). Allow greater height for larger lots and if at least 50 percent of houses within 300 feet are taller, to a maximum of 32 feet.

Internal ADUs and internal conversions: Require the retention of the original primary structure, including front setback and entry façade when constructing an internal ADU or internal conversion.

FAR for auxiliary structures: Allow 0.15 FAR for detached auxiliary structures. Allow an attached garage at grade level on lots more than 60 feet wide. Allow a breezeway connection (less than 8(?) feet long for detached garages.

Design standards: Require auxiliary structures to be compatible with the primary structure.

Garages: Require garages, where included, to be large enough to accommodate a car.

Dormers: The proposed change is good.

Bonus units: Do not allow bonus units.

Open space: Increase the required contiguous open space. Do not count areas tucked under second floor as part of the open space.

Narrow lots in R5: As directed by City Council, December 2016, do not allow development on sub-sized lots.

Ownership: Require fee simple ownership of the primary structure and its ADUs. Do not permit condominiumization. Do not allow lot divisions below the base zone lot size.

Long term residency: Incorporate requirements that ADUs be used for long term housing.

#### **HOUSING OPPORTUNITY OVERLAY ZONE and MAPPING METHODOLOGY**

The concept of the Housing Opportunity Overlay Zone is good. If used properly it will increase density, increase property values near centers, and create complete neighborhoods. But there are many issues with the specific proposals, and there are opportunities that are being overlooked.

Retention of existing houses: Provide more incentives for the retention of existing houses and disincentives for their removal. Naturally Occurring Affordable Houses (NOAH) provide the most affordable housing. These are usually smaller, older, and with fewer amenities. The cheapest house is the one that is already built.

Conflict with the Comprehensive Plan: One of the foundations of Portland's Comprehensive Plan is the focus of denser development around centers. The proposed HOOZ undermines that foundation. To allow dispersed density will not reduce the use of automobiles, enhance walkable neighborhoods, support public transit, nor make efficient use of expensive infrastructure. Reduce the size of the overlay to 200-300 feet from centers.

Conflict with City Council direction: In December, 2016, Council directed staff to provide options for a housing opportunity zone map. This has not been done.

Conflict with zoning designations: Within the R5 (5000sf lot) single dwelling zone, the HOOZ allows density higher than the base density allowed in the R2 multifamily zone. This is upside down, deceptive zoning. It destroys the concept of the single dwelling zone. Reduce the density allowed in the HOOZ.

Triplexes: Do not allow triplexes.

Middle housing as a transition: The concept of middle housing is as a transition from higher to lower densities, from larger buildings to single family homes. The Draft Proposal does away with the single family housing in the prime neighborhoods of Portland's east side. You can go from the southern city limits to Columbia Blvd. and from the Willamette to 82<sup>nd</sup> without ever being in a truly single dwelling neighborhood. Again, the solution is to reduce the size of the overlay.

Complete neighborhoods: Provide strategies and incentives to create complete walkable neighborhoods in parts of the city that do not have them, especially in east Portland. Do not limit "opportunities" to vibrant complete neighborhoods.

Integration with the City's housing strategies: Throughout the city, not just in opportunity zones, Portland needs strategies to preserve Naturally Occurring Affordable Housing (NOAH). These should be applied to single family homes as well as multifamily homes.

Mapping of HOOZs: Some of the HOOZ areas seem to be arbitrarily and inconsistently drawn. There are some real stretches to include certain areas within the HOOZ.

- Use actual measurements from frequent service bus lines/stops. Do not use bubble mapping.
- upgrades will happen soon is beyond wishful thinking. Instead, conduct five or ten year reviews of these areas to see if they warrant inclusion in the HOOZ at that time.
- Look seriously at infrastructure and other constraints before including areas. Look also at city housing plans such as the North/Northeast Housing Strategy. (See the attached analysis of the South Burlingame HOOZ.)
- Involve neighborhoods in making HOOZ decisions.

**Analysis of proposed Housing Opportunity Overlay Zone in the South Burlingame Neighborhood.**

- **The draft code proposal fails to follow City Council direction.** The draft proposal does not provide variously sized HOOZ options as directed by the City Council in December, 2016. (See attachment A.)
- **South Burlingame is more than one-quarter mile from a frequent service transit line.** Because of the I-5 barrier, there are only two access points to South Burlingame (south of I-5) from the Barbur Blvd. frequent transit service line. These are at Terwilliger and at 19th. As the pedestrian walks, each of these access points is at least one-quarter mile from any houses in the neighborhood. These distances are based on actual, on the ground measurements. (See attachment B.)
- **There is very little transit use by residents of South Burlingame.** By actual count, only five passengers disembarking from buses at Barbur and Terwilliger crossed the I-5 bridge towards the proposed South Burlingame HOOZ during a two hour evening rush hour period. (See Attachment C.)
- **Walkability is poor. There is no sidewalk access to the commercial area.** While neighborhood residents value and patronize the businesses at the corner of Taylor's Ferry and Terwilliger, access is almost entirely by car.
- **PBOT has identified the intersection of SW Taylor's Ferry and Terwilliger as a "failed intersection", Grade "F".** It is not safe for walkers to cross either Terwilliger or Taylor's Ferry except at a signaled intersection. Taylor's Ferry and Terwilliger are primarily through streets for traffic going beyond South Burlingame.
- **Street infrastructure is inadequate.** Many South Burlingame streets do not have sidewalks. Many streets do have narrow strips of pavement and no curbs. Some streets are unimproved. This collection of streets disrupts connectivity, focuses traffic down only a few streets, and limits street parking. To include these areas in the Overlay in anticipation of their future improvement by the city is beyond wishful thinking. (See attachment D.)

**Attachment A. (South Burlingame HOOZ)**

**HOUSING OPPORTUNITY OVERLAY ZONE DIRECTION FROM CITY COUNCIL,  
DECEMBER, 2016**

Establish a Housing Opportunity Overlay Zone in select areas.

- a) Apply a housing opportunity zone within the following areas:
- ¼ mile (about five blocks) of Centers
  - ¼ mile (about five blocks) of corridors with frequent bus service
  - ¼ mile (about five blocks) of high capacity transit (MAX) stations
  - Within the inner ring neighborhoods, and
  - Medium, medium high, and high opportunity housing neighborhoods.

5<sup>th</sup> Ammendment (Commissioner Fish)

- a) Provide options for a housing opportunity overlay zone map.

## Attachment B. (South Burlingame HOOZ)

### BARBUR AND TERWILLIGER BUS PASSENGER CENSUS

Survey date: Monday, October 23, 2017

Survey time: 4:00 – 6:00 PM

Weather: Sunny, 65 degrees.

Location: Intersection of SW Barbur Blvd and SW Terwilliger Blvd.]

A census of disembarking passengers was conducted at the Trimet stops adjacent to the intersection. Both inbound and outbound stops and disembarking passengers were counted.

Barbur Blvd is a frequent service line (#12) with a total of three inbound and five outbound lines serving the intersection. These stops serve the South Burlingame neighborhood to the south of I-5 in addition to other neighborhoods north of Barbur. The portion of South Burlingame proposed for a HOOZ is separated from Barbur Blvd by I-5. It is 1375 feet (0.26 mile) from the bus stop to the entrance to the South Burlingame neighborhood.

**A total of 5 passengers exited buses and proceeded across I-5 to the proposed South Burlingame HOOZ.**

Stops at SW 19<sup>th</sup> and Barbur also serve South Burlingame. Because these stops serve additional neighborhoods south of Barbur, they were not censused.

#### INBOUND BUSES

Did not stop	13 buses	
Stopped	7 buses	
Total	20 buses	
Disembarking passengers		3
<b>Disembarking passengers heading to S Burlingame</b>		<b>0</b>

#### OUTBOUND BUSES

Did not stop	16 buses	
Stopped	16 buses	
Total	32 buses	
Disembarking passengers		18
<b>Disembarking passengers heading to S Burlingame</b>		<b>5</b>

**Total passengers heading to South Burlingame 5**

**Attachment C. (South Burlingame HOOZ)**

**DISTANCE FROM FREQUENT TRANSIT TO SOUTH BURLINGAME**

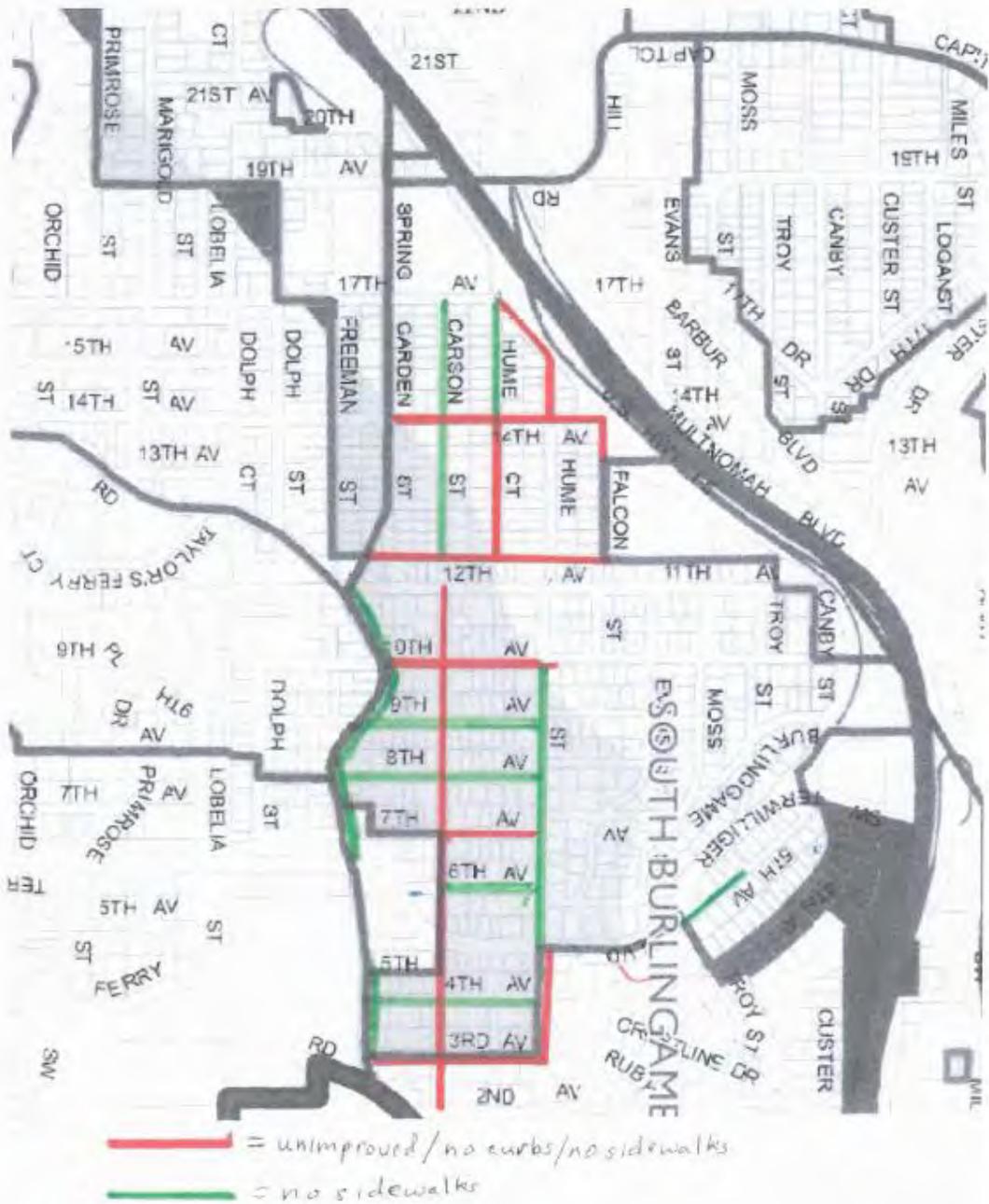
Actual distances were measured using measuring wheel.

Distances measured from bus stop on south side of Barbur to entry point to South Burlingame neighborhood and nearest houses.

Barbur/Terwilliger across Terwilliger Bridge to Troy: 1375 feet (0.26 mile). **No houses are within one-quarter mile of the nearest frequent transit stop.**

Barbur/Terwilliger across Terwilliger Bridge to steps at south end of bridge: 933 feet (0.177 mile). Accessed by a long flight of steps down to 4<sup>th</sup> Avenue, **perhaps five houses are within one-quarter mile from the nearest frequent transit stop** and are accessible by the flight of steps down to 4<sup>th</sup> Avenue.

Barbur/19<sup>th</sup> across 19<sup>th</sup> Avenue bridge past Capitol Hill School to Spring Garden Street, then left on Spring Garden to 17<sup>th</sup>: 1424 feet (0.27 mile). **No houses are within one quarter mile of the nearest frequent transit stop.**



Attachment D.

## **NARROW LOTS**

Zoning changes: In R5 zones, do not change to R2.5. The platting is the historic artifact, not the R5 zoning. Clarity is provided by not changing the zoning. Changing the zone would not be inconsistent with the direction given by the City Council, December, 2016.

Density: Require two units when new development is proposed on a 5000sf lot or larger in R2.5.

Attached houses: In currently zoned R2.5, require attached houses on lots 25 feet in width or less.

Lot width: Consistent with the Draft Proposal, do not allow development of a detached house on a lot less than 36 feet wide.

Height: The Draft Proposal seems appropriate, except limit height to 30 feet for attached houses. Limit height of a single house to 25 feet.

Flag lots: Require retention of the original structure. Limit flag structure to 1000sf and 25 foot height. Incorporate design standards to assure compatibility with the existing structure.

## **CLUSTER HOUSING**

The concept of cluster housing is quite appealing. It must be well regulated to protect adjacent properties.

Draft Proposal: The current proposals are inadequate. There will be significant differences between sites, but standards for density, auxiliary structures, scale, setback, etc. must be incorporated into the code.

Neighborhood context: Cluster developments must be oriented to the street and public space as well as towards internal shared space. Development needs to protect the neighboring properties' access to sunlight and privacy.

Parking: Off street parking must be provided.

5

27 November 2017

RECEIVED  
PLANNING & SUSTAINABILITY  
2017 NOV 30 A 10:05

City of Portland Bureau of Planning, Attn: RIP comment  
1900 SW Fourth Ave., Suite 7100  
Portland, OR 97201

Greetings:

I am appalled that the Residential Infill Project (RIP) incentivizes demolitions, proposing sweeping changes and rezoning that dispense with decades of land-use planning.

**Scale:** Either count the *total square footage* of the project toward the 2,500-square-foot limit, or delete this meaningless provision entirely. Excluding the top and bottom floors of new builds from the calculation does a disservice to people who are led to believe this part of RIP will make a difference. The "limit" as proposed would not have affected more than 99 percent of new construction built in recent memory; it preserves developers' business as usual. It is disingenuous to suggest otherwise, and damages the credibility of planners and RIP in general.

**Housing "opportunity" area:** For whom? Whenever you offer a multi-unit payout on what had been a single-family lot, you encourage demolitions. The official outline for RIP (see reverse) was to "explore the feasibility and appropriateness of alternative housing options," never mentioning a wholesale rezoning. Shame on you for taking a project sparked by good intentions and turning it into a weapon to use against Portlanders, many of whose life savings are in their home and its attendant values assured by zoning. Let's build on vacant land *only*—we have plenty.

**Narrow lots:** City Council specifically voted down development of these lots on Dec. 7, 2016. Why, then, is this topic resurrected, and apparently through a process occurring outside the public view? As Sandra Wood said then at City Council, a prohibition on building on narrow lots "doesn't treat accidents of historic platting as a reason for upzoning." ([www.youtube.com/watch?v=mQR-kE7pUvN&list=PL8J14](http://www.youtube.com/watch?v=mQR-kE7pUvN&list=PL8J14))

**What to keep:** Given the flawed process and imbalanced makeup of the committee drafting the proposal, few parts of the proposal serve to guide better development. They are: the new way of measuring height of new builds, a limit on the number of steps to the front porch, and some elements of the new setback provisions (see the "RIP-SAC 7" stance on this).

We're paying for good planning; let's see it. I hope the bureau will work to restore public trust, finding ways to maintain our finite resource of old-growth, "green," and affordable housing.

Without the city's leadership in creating a sustainable path forward for new development, activism at the ground level and direct confrontation at open houses and other events will continue to make an impact and force change up from the grass-roots level as we educate and inform neighbors about the outside effects of teardown development, from hazmat dispersal to higher home prices.



## Residential Infill – Single-dwelling Development Standards

This project will focus on single-dwelling development standards. There are three primary topics under discussion: scale of houses, narrow lot development and alternative housing options.

*What's not included?* This project won't be addressing a number of related issues, including rules for demolition/deconstruction, historic preservation, systems development charges and fee structures, moveable homes (aka tiny houses on wheels), or changes to community design standards.

### 1. Scale of houses

The single-dwelling zoning rules establish building envelopes (or maximum size) through measurable standards such as:

- Maximum height limits.
- Maximum lot coverage.
- Minimum setbacks and yard area.

This project will explore whether these standards should change, to what extent, and where.



### 2. Narrow lot development

Infill development often occurs on lots that are narrower than the traditional development pattern, either because of existing platting or new partitions. This project will explore:

- Minimum lot dimensions for new development.
- Allowing detached vs. attached houses.
- Height, lot coverage, setbacks and garages.



### 3. Alternative housing options

The cost of housing is rising along with land values, and more people are drawn to places near stores, parks, jobs or other amenities. This project will explore the feasibility and appropriateness of alternative housing options to provide more people with access to such amenities while keeping costs down, including:

- Internal house conversions (creating multiple units inside an existing house).
- Secondary accessory dwelling units (one inside the house and one detached).
- Cottage cluster development (multiple smaller houses on a single lot).
- Stacked flats (units arranged on top of each other as opposed to side by side).





RECEIVED  
PLANNING & SUSTAINABILITY

2017 NOV 21 A 9 58

City of Portland  
Bureau of Planning & Sustainability  
1900 S.W. Fourth Avenue Suite 7100  
Portland, OR 97201

Attention: Residential Infill Project

Dear Planners:

Our family has resided in Laurelhurst since 1949. We are three generations with three single family homes two of which I still own one as my primary dwelling - one as a rental for my grand niece & nephew.

What is right & good with R5 - Family living - safety - Schools - 2 within 2 blocks serving 500 children each - children walking or biking to school - transit - Max - bus - walking distance to grocery stores - banks - hardware - restaurants - pharmacy - hair salons, plumbing - theater - church

\* Summer of 2016 on the 700 block of NE Royal Court "5" homes sold - 3 senior couples replaced by young families w children

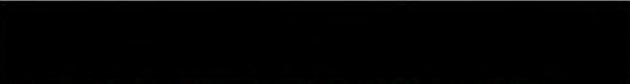
"3' and more on way — 2 families w children  
outgrew homes and were replaced by new  
families. ~ Why NE Royal Court — ?

### LIVABLE RS ZONE.

Families need homes in the city which  
support family living. Why are there  
1,000 children attending schools within  
two blocks of my home?

If you impact city neighborhoods which  
have thrived for 100+ years with Residential  
Infill Projects of Higher Density you will  
destroy single family lifestyle in  
the city. In the 70s we fought for R1a  
zoning and the Laurelhurst Neighborhood  
continues to THRIVE and serve families  
in the city -

Do NOT POLLUTE RS zones

  
Resident of Laurelhurst  
- 68 years. -

# Appendix C: BPS Lobby Exhibit Written Comments

Residential Infill Project materials were exhibited in the first-floor lobby of the Bureau of Planning and Sustainability's office. Flip charts were available for individuals to write comments, notes, and reactions. The text of those comments is transcribed below. Comments have not been edited.

1	So sorry to see Portland neighborhoods destroyed by shoving infill houses by tearing down perfectly good houses. There is no infrastructure in place for increases in residents....streets, schools, etc.
2	I concur. To truly combat the housing issue, one must first ensure that people can afford and live comfortably in those houses. Consider the increase in resource requirements (more schools for more kids, more grocery stores with inexpensive food for more families, etc.)
3	The culture has changed since World War 2. Expecting people to build pre-war sized houses now is naive. Nothing is preventing it now. People like to have more room. We all spend way more time inside our homes now.
4	I AGREE [with arrow pointing to comment 1]
5	I'd prefer to see this infill rather than expansion of the UGB and allowing new development on rich soils in farmland. It's a tradeoff I accept.
6	Very much against infill project. Ruining our city. Cheap housing with little greenery. Treating people like rats. I grew up in North Portland and it is being ruined by infill and debris from homeless camps.
7	Sorry but we need higher population density or you're going to have worse problems
8	Scale of houses: the photo used (long stairs) could not be built anyway. stairs > 30" subject to setbacks. This section of proposal is too drastic.
9	So, all skinny house designs from design competition are no longer allowed?
10	How can we help homeowners to build more ADUs?
11	Who can afford new houses? Pushing lower income out of neighborhoods already healthy and owned. Trees protected?
12	You are engineering gentrification
13	Show us where this has made houses affordable/rent/own?
14	Smaller house units = less energy waste. More efficient use of space. You want more space? Move to the country.
15	Smaller sq. ft. = less housing units; limiting sq. ft. is an excessive restriction based on political agenda, not solving housing problems.
16	I agree with allowing more units. I disagree with allowing less development. Owner occupied properties will use allowance for owner
17	Smaller, more affordable units; more cohousing and high density clusters.
18	I could live in a 10x10x7 box if it had utilities, and maybe a garden at front. My concern is affording that on minimum wage, 'cuz I can't atm
19	Rezoning 'historically narrow' lots? Amazing what having so many developers on RIPSAC board will do. Giving developers more \$ and destroying historic neighborhoods. More old, perfectly

	sound, houses made of old growth lumber + having real character will be bulldozed to make way for badly built infill.
20	Don't you love how NIMBYs have so many opinions about other people's homes?
21	Nimby's – easy slur, cop-out. [with arrow pointing to comment 20]
22	Where has this been done before and what were the results? Tree protection on R2.5 lots previous R5 with lg trees? Flexible building area to save trees [with arrow pointing to diagram] Add drip zone square feet to F.A.R. allowed in houses
23	2,500 SQFT MAX Build is ridiculous in certain neighborhoods (Grant, Sellwood, Alameda etc.) in these areas many old houses are over 3,000 sqft including basement footage. In Grant Park a new 2,500 sqft House will go for 850k while a 3000 sqft home will go for 1.1 mil+ and is in character with the neighborhood. Some people want big expensive new Homes in Portland. Instead of crippling the high end market why dont you emphasize building appearance and matching houses to neighborhoods? Put a reasonable cap on buildings but don't destroy the high end market.
24	[diagram showing decreased proposed scale in R zones compared to increased proposed scale in C zones with an arrow between them labeled "odd relationship"]
25	[diagram showing tuck-under garage with a car unable to enter it due to the grade of the driveway with notes saying "needs to work for more SUV's" and "this condition needs research for angle of driveway"]
26	It would be nice to build in concessions for superinsulated homes that doesn't penalize the usable space.
27	Owner occupied neighborhoods have a very different characteristic to renter occupied; the long term vested interest is better in owner occupied neighborhoods. inner SE Portland tried the multifamily high density in the 60's + 70's, and it severely impacted those neighborhoods
29	Parking MUST be required for each unit added or built Downtown – Traffic is terrible & streets flood w/ parked cars.
30	Not having parking encourages the use of alternate modes of transportation. It can actually alleviate traffic if you have less parking.
31	yes! [in response to comment 30]
32	Nice concept, but does not help attract viable ground-floor retail in appt. Bldgs... [with arrow pointing to comment 30]
33	Lots of Portlanders <3 the Victorian style – Replace should be same style.
34	Where will the displace go? The cheapest house is already built!
35	The subtracted A1 zone/blue [removed parts of 'a' overlay] restricts/doesn't extend opps offered to the rest of the city to those who are already in disadvantaged areas. Help GIVE/SHEPARD opps; not restrict.
36	yes to the "visitable" concept. Stairs are becoming barriers to independent living as we age

Residential Infill Project: Discussion Draft

## Appendix D: **Letters from Organizations**

This appendix contains the letters received from 46 organizations, shown in the following order:

**Nonprofits & advocacy groups**

**Agencies & commissions**

**Housing developers**

**Business interests**

**Neighborhood associations & district coalitions**

Nonprofits & advocacy groups

## Tracy, Morgan

---

**From:** Julia Metz <julia@pcrihome.org>  
**Sent:** Thursday, November 30, 2017 11:49 AM  
**To:** Tracy, Morgan; Borkowitz, Todd; Bump, Tyler; Gisler, Julia  
**Cc:** BPS Residential Infill; Travis Phillips; Michael Fu  
**Subject:** PCRI Residential Infill Project - Discussion Draft Feedback

**Categories:** DD\_Comment

Good Morning Everyone!

We want to thank you for the amount of time and effort that has been put into the development of the Residential Infill Project Discussion Draft. We recognize the priority that staff has put on reaching out to non-profit developers and community organizations to ensure that the code amendments respond to the needs of the City's most vulnerable populations. We also recognize and appreciate staff's efforts to incorporate the varied and numerous opinions and perspectives that exist within Portland.

Below is an overview of our thoughts and recommendations on the RIP Discussion Draft. We'd be happy to discuss any of the below with staff if that would be helpful.

### **Scale of Houses**

#### **1. Limit the size of houses while maintaining flexibility**

##### *Triplex FAR*

We appreciate the additional FAR allowances that are given for triplexes on corners; however, we want to ensure that this would also extend to triplexes being built on interior lots via the density bonuses that may be accessed if providing affordable units on the site. It is key that affordable housing units are still able to access this increased FAR allowance so that our vulnerable communities aren't being squeezed into substandard, smaller homes. The FAR proposed in Table 405-2 would be sufficient for this.

##### *Family sized units*

Family-sized units are desperately needed throughout Portland. However, the current FAR and minimum lot size limitations would limit the ability to build truly family-sized units. We feel it is important to provide both an FAR increase as well as a decrease in the minimum lot size allowance for developments that provide 3-bedroom units. RIP should include an increased FAR bonus of 0.15 (on top of both the base zone for single family homes and duplexes and on top of the special triplex FAR) and a 300 SF minimum lot size decrease when at least 1 unit will provide 3-bedrooms.

### **Housing Opportunity**

#### **5. Create a new Additional Housing Opportunity overlay zone – the new 'a' overlay zone.**

**And**

#### **6. Apply the new 'a' overlay zone in select areas**

While we appreciate the work that has been done thus far in the geographic analysis of vulnerable populations at risk of displacement, we feel there is further analysis that needs to be completed and the application of the analysis spatially, is flawed and counter to the purposes of such analysis. We worry about unintended, negative market impacts that would be caused by limiting the application of the Housing Opportunity components with the proposed overlay. Instead, we support what has been put forth by other community organization partners in removing the 'a' overlay and instead, allowing access to the Housing Opportunity components across the city.

##### *Visitable units:*

We recognize and support the intended purpose of linking additional density allowances to providing at least one visitable unit. However, we do have concerns regarding the feasibility of reaching this on every project, even if we'd like

to. Providing wider halls and doors as well as the visitable living area as defined will not be an issue. However, we do have concerns around the required visitable bathroom and entrance.

- Visitable bathroom: Requiring “a 60-inch diameter circle with no obstructions” combined with FAR and lot coverage limitations creates a spatial challenge for compact designs that have limited space on the ground floor. Additionally, this limits the opportunity to apply visitable standards in ADU units – which are a large component of the RIP Discussion Draft. Instead, we would recommend exploring opportunities for other visitable bathroom standards, such as the “hammerhead” pivot standard, and/or reinforcement in walls next to toilets for future installation of grab bars
- Visitable entrances: We appreciate that the exemptions take into account both the average slope of the site as well as sites that may have a dramatic slope from the right-of-way used to access the lot. The latter is the greatest concern for us when looking at typical lots in inner-N/NE Portland. While the lots themselves may be relatively flat, many sit several feet above the right-of-way, making it difficult to provide an accessible route to unit entrances. We’ve conducted several hypothetical studies on sites in our development pipeline to explore the potential implications of the standards and exemptions as currently written. Based on the high-level analysis we did, we feel the 10% slope should be reduced to a 7% slope. We’d be happy to go over specifics of our analysis with staff. It also would be helpful to be clarify if “nearest right-of-way” is inclusive of alleyways – as it seems that this would not meet the purpose of the standards if it is. Lastly, there needs to be clarification about if there will be requirements for entrance locations as it relates to this measurement or if “as designed” will be acceptable (beyond the existing requirement for a street facing entrance at the front unit). This would be helpful in order to ensure consistency and prescriptive application of the code language. We would advocate that there not be additional requirements for entry locations, as even the existing requirements around entrances already limits how accessible entrances can be designed, and additional layers to this would be even more restrictive and challenging.
- Cost implications: while we don’t have the capacity to do an intensive cost implication of these standards ourselves, we encourage staff to look into this further and consider the potential cost burden on non-profit developers who cannot simply pass-through costs with increased rents or sale prices. Of specific concern are increased concrete work needed for retaining walls if a ramp/accessible route is being constructed in lieu of stairs, and meeting stormwater requirements if constructing a ramp where permeable pavers aren’t an option (this can translate to needing to use permeable concrete which comes at a higher cost than standard concrete, and/or a larger drywell which impacts cost and buildable area for a project).

#### *Implications of loss of existing ‘a’ overlay*

Under current code, PCRI has several sites in the current ‘a’ overlay which allows us to develop triplexes by right on interior lots (33.405.070). As proposed, we would lose the ability to do this unless we are able to provide a visitable unit and, as currently written, all permanently affordable units. While PCRI is committed to the cause behind both of these requirements, it can be a difficult requirement for us to meet between site constraints and our current focus on providing low-income homeownership options which aren’t necessarily going to be held as permanently affordable (this is discussed in greater detail below). As a result, if code language moves forward as currently drafted, we would lose the opportunity to build approximately 10 affordable units currently in our development pipeline.

#### **7. Provide incentives for affordable housing and historic preservation**

The affordable housing bonus should be one that both benefits organizations already looking to increase the stock of affordable housing, while also incentivizing market-rate developers to respond to Portland’s shortage of affordable units. The current affordable housing bonus structure doesn’t pencil – instead it would act as a penalty for providing affordable units. Instead, we recommend that staff explore options such as:

- 1 unit at 80% MFI or 2 units at 100% MFI would allow one additional bonus unit
- If the affordable unit will be family-sized (3+ bedrooms), increase the income cap to 100% MFI for 1 unit. This will help respond to the lack of affordable family units for those at or below the area’s median income.

Under PCRI's flagship initiative, Pathway 1000, PCRI has plans to build 800 homeownership units over the next 10 years. While we continue to explore a variety of affordable homeownership models, our primary focus for these units is to provide an affordable homeownership opportunity for community members that have been displaced or at risk of being displaced from inner-N/NE Portland. Many of these are people that have faced generational barriers to accessing the benefits that come with homeownership, and thus our focus is to allow them full access to the equity of their homes, meaning that PCRI will not put any resale restrictions on the homes after the initial sale. As it is currently written, this means that PCRI would not be able to access the affordable housing bonuses that are written into RIP because they hinge on units being permanently affordable. Additionally, as mentioned earlier, non-profits can't solve the affordable housing crisis alone – we need the help of all developers to meet the needs of our communities. It is important to consider the challenge that market-rate developers will face if sales are income restricted indefinitely, as lenders often won't fund a project with those types of restrictions because they consider it higher risk.

We ask that staff seriously explore options to allow models such as ours to access bonuses in order to increase the supply of affordable homeownership options that exist in Portland. By giving access to homeownership to one family, it also results in access to an affordable rental unit for another family – thus increasing the supply of affordable housing twofold. Utilizing existing screening tools such as SDC Waivers, HOLTE, or CET Waivers with an additional required “affordable housing fee” if the developer goes back on their promise of providing the units at an affordable rate could be an easy mechanism to leverage for this. While we are recommending a reduction in the required number of units to access the affordable housing bonus above, we would be open to exploring options for an affordable housing bonus based on 100% affordable units but not requiring permanent affordability in conjunction with the option to provide 1 or 2 permanently affordable units utilizing the structure mentioned at the beginning of this section.

## **Narrow Lots**

### *General*

We strongly support the continued option to develop on narrow lots. Narrow lots provide a particularly valuable option for developing affordable, fee-simple homeownership opportunities. Even when developed at market rate, homes on narrow lots tend to be much more affordable than their full-lot counterparts – this is an essential piece to Portland's housing crisis that cannot be dismissed or removed from the housing stock. This also relates to the allowances in RIP for easier property line adjustments, reducing the minimum lot width for land divisions, and small flag lot options. All of these create valuable opportunities for fee-simple homeownership development. For us, this provides an important cost savings compared to condo development. For homeowners, this provides a homeownership model that is often more appealing than a formal condo HOA format and more flexibility in terms of accessing home loans.

We highly encourage staff to explore more options for fee-simple development options as part of RIP. This should include provisions for mid-block duplexes and corner triplexes to mimic the existing corner attached house code, which allows each unit its own lot and allows units to be owned separately. We would be happy to review the costs of condo development vs fee simple development with staff to provide examples of this. Please reference Eli Spevak's letter with more detail on this topic, which PCRI has co-signed along with a number of our community partners.

### **11. Revise rules for parking and garages on all narrow lots**

We are glad to see the removal of required parking on narrow lots. We do, however, encourage staff to consider the impacts of requiring proposed parking off an alley, if present. While this is a desirable use of alleyways, most are unimproved and if parking is formally proposed off of an alleyway, the City requires improvements to be made to the alley, which often proves to be very costly and challenging. In the case of unimproved alleys, we would like to see an exception to the alley access requirement.

Again, thank you for all of your work on this project! We look forward to reviewing the revised draft,

The PCRI Team

Julia Metz  
Associate Housing Developer



6329 NE Martin Luther King Jr. Blvd.  
Portland, OR 97211

T: (503) 288-2923 x129 | F: (503) 288-2891

[www.pcrihome.org](http://www.pcrihome.org)

[www.pathway1000.org](http://www.pathway1000.org)



[@PCRIHome](https://twitter.com/PCRIHome)



[@pcrihome](https://www.instagram.com/pcrihome)



[@PCRIHome](https://www.facebook.com/PCRIHome)



November 30, 2017

To: Bureau of Planning and Sustainability

RE: Residential Infill Project

ROSE is a nonprofit organization that has been working to revitalize outer southeast Portland neighborhoods for the last 25 years. One of the ways that we do that is by developing and operating affordable housing. I appreciate that the Bureau is taking steps to address the housing shortage and there are a number of positive elements in the RIP recommendations.

My primary concern is that East Portland should be included in the “housing opportunity” zones. Large sections of East Portland have been eliminated from these zones in the latest version of RIP. Encouraging denser redevelopment of East Portland residential areas is essential to the housing and economic development goals of the East Portland Action Plan.

I support Portland For Everyone’s RIP recommendations:

- **Allow the “housing opportunity” provisions in all areas of the city** to improve equity outcomes and encourage the creation of additional walking scale neighborhoods.
- **Make the affordable housing incentives workable** to increase the likelihood that they will be utilized.
- **Allow internal conversion of existing houses into multiple units in all areas**, and provide additional incentives for housing preservation.
- **Create a true cottage cluster code** that will encourage the development of smaller, more affordable homes.
- **Rezone all historically narrow lots from R5 to R2.5**, with design improvements, to share land costs and provide housing options that more families can afford.
- **Support a healthy urban tree canopy** by designing flexible code provisions that incentivize saving trees and creating less impervious surface.

RIP is a good start, but I hope that BPS will take much more aggressive measures. Portland’s housing and homelessness crisis has deepened since the adoption of the Comprehensive Plan. Despite this, the Comp Plan has reduced the amount of land zoned for multi-family development. BPS projects that 80% of the new residential units in Portland will be multi-family. This is a mismatch with zoning; 80% of the residentially zoned land in the city is zoned for single-family. The Comp Plan directs the bulk of new multi-family development onto mixed-use corridors, where costs are higher due to construction methods and design review.

To adequately address the housing crisis – especially for very-low-income households – Portland must accommodate more multi-family development. Every little bit helps, but the crisis will not be solved with plexes, ADUs and tiny houses.

Thank you for the opportunity to comment on the RIP. ROSE is eager to work with the City to meet the housing needs of Portlanders.

Sincerely,

A handwritten signature in black ink that reads "Nick Sauvie". The signature is written in a cursive, slightly slanted style.

Nick Sauvie  
Executive Director

Portland Bureau of Planning & Sustainability  
1900 SW 4th Ave, Suite 701  
Portland, OR 97204  
Attn: Residential Infill Project staff  
November 30, 2017

Dear Portland City staff and decision-makers,

We are generally supportive of the Residential Infill Project as proposed in the recent Discussion Draft. However, we believe the proposal can be strengthened in the following ways, if the intent is truly to deliver more affordable housing options to Portland residents:

**The housing choices included in the current “Housing Opportunity Overlay” (Recommendations 5-8) should be allowed in all neighborhoods, everywhere.** In its current form, the overlay denies much of East Portland and other neighborhoods the benefits of density needed to support transit access, walkable neighborhoods, and greater housing choices for seniors, young families, and low- to moderate-income households. East Portland is also among the most affordable areas of our city at this time. Therefore, the best way to create homeownership opportunities for households at/below MFI would be to allow these alternative housing options, coupled with incentives for affordability, in all neighborhoods--but particularly those where land and property values have not yet skyrocketed.

**Consider whether additional FAR should be made available in the following scenarios:**

- When building a duplex instead of a stand-alone home
- When building a triplex instead of a stand-alone home
- When utilizing the affordable housing bonus
- When constructing new family-sized homes with 2+ bedrooms

**Improve the affordable housing bonus for all developers:** The current threshold - 100% of units on a site to qualify for a bonus - is too high. Reinstating a workable bonus scheme would make the development of affordable homes far more feasible for any developer, including non-profits such as ours. The bonus should also adequately incent private developers to opt in, thereby encouraging, not stifling, more of the beneficial non-profit/private partnerships being leveraged effectively in Portland today. We recommend adjusting the affordable housing bonus structure to:

- Allow bonus units [and/or increased FAR] for providing one or more affordable units.
- Provide additional FAR for family-sized (2+ bedroom) units utilizing this bonus.

**Cottage cluster code.** We support staff’s recommendation to allow cottage cluster developments on suitable neighborhood sites. However, the current proposal does not produce a development type reflective of cottage clusters as they are known. Alter the proposal to:

- Draw on cluster codes successfully implemented in other places with key features like reduced home sizes, homes oriented toward shared courtyards, and parking located toward the periphery (if any).
- Allow, by right, cottage cluster developments that meet these rules.
- Allow a subdivision approach for cottage clusters to enable fee-simple ownership.
- Give a density bonus in exchange for the provision of more, smaller homes.

**Rezone all historically narrow lots from R5 to R2.5, and allow development on narrow lots citywide.** Development on historically platted narrow lots represents a unique opportunity to share the cost of land among multiple homes, supporting the City’s stated goal of providing more housing options at purchase prices that more families can afford. This strategy has been shown to provide deeper affordability than typical single-dwelling homes, especially when coupled with affordable homeownership programs. We support provisions that improve the design & aesthetics of homes built on these historically narrow lots. We also support improvements and clarifications to the R2.5 zone, especially allowing

property line adjustments that can help preserve existing housing while adding more, smaller, and more affordable homes.

**Fee-simple ownership options.** Rewrite provisions for mid-block duplexes and corner triplexes (or four-plexes with a bonus) to mimic the current corner duplex code, which allows each unit its own lot, and allows units to be owned separately.

Sincerely,

Handwritten signature of Dianne Linn in black ink.

Dianne Linn  
Executive Director, Proud Ground

Handwritten signature of Steve Messinetti in black ink.

Steve Messinetti  
CEO, Habitat for Humanity Portland/Metro East



Portland Bureau of Planning & Sustainability  
1900 SW 4th Ave, Suite 701  
Portland, OR 97204  
Attn: Residential Infill Project staff

November 27, 2017

Dear Portland City staff and decision-makers,

Portland for Everyone, a coalition of individuals, affordable housing advocates, community-based, transportation, and environmental organizations, neighborhoods, and local businesses, came together last year to advocate for those land use changes that will support abundant, diverse, and affordable housing options for Portland residents.

We have reviewed the Residential Infill Project Discussion Draft, with one main question in mind: *“Will this plan meaningfully expand housing options and increase affordability for Portlanders in every neighborhood?”*

The Discussion Draft, as currently written, will fall short of meeting this aim. However, we think it contains many positive elements, and we are confident that the following improvements to the draft to ensure that the worthy goals of this project will be successfully met:

- **Allow the “housing opportunity” provisions in all areas of the city** to improve equity outcomes and encourage the creation of additional walking scale neighborhoods.
- **Make the affordable housing incentives workable** to increase the likelihood that they will be utilized.
- **Allow internal conversion of existing houses into multiple units in all areas**, and provide additional incentives for housing preservation.
- **Create a true cottage cluster code** that will encourage the development of smaller, more affordable homes.
- **Rezone all historically narrow lots from R5 to R2.5**, with design improvements, to share land costs and provide housing options that more families can afford.
- **Support a healthy urban tree canopy** by designing flexible code provisions that incentivize saving trees and creating less impervious surfaces.

By incorporating the feedback that Portland for Everyone has gathered from our coalition members and from the community, we believe the City can seize this historic opportunity to help alleviate the chronic suffering of tens of thousands of residents, allow flexible options for families as their circumstances change over time, and give Portlanders a chance to grow up - or grow old - without having to leave their neighborhood.

Thank you for considering our feedback. We look forward to engaging further on this critical project, and we sincerely thank staff and decision-makers for their tireless work on it.

### **What the Residential Infill Project Discussion Draft does well:**

*Expand access to housing opportunity.* We support the proposal's inclusive definition of areas of "opportunity." First, that "opportunity" includes the ability to walk to school, neighborhood stores, a park, or employment opportunities, as well as being within ¼ mile of transit. Second, it does not freeze "opportunity" areas based on today's transit service or sidewalks; this is a long-range plan that must be accompanied by complementary infrastructure investments throughout the city. Indeed, supportive densities usually predate frequent transit and corner stores, not the reverse.

*Alternative housing options (duplexes, triplexes, cottages, multiple ADUs).* Providing the opportunity for smaller housing options: allows families of all sizes and ages to live in the same neighborhoods; enables aging in community; provides opportunities for teachers, first responders, and other middle-income people to live in the neighborhoods they serve; and supports population densities necessary to foster walkable neighborhoods and pedestrian-oriented commercial districts – all within residential buildings *smaller* than those allowed under current code. These measures also help to create more resource- and energy-efficient homes, enhance the walking experience, and provide the opportunity for more trees and vegetation. Improvements to the R2.5 zone, in particular, will encourage more efficient use of urban residential land while complementing the visual appearance of existing neighborhoods.

*Preservation and adaptive reuse strategies.* Portland's independent economic analysis demonstrates that the proposed reduction in house scale will also reduce the number of demolitions of single-family homes, even as allowing more duplexes increases citywide unit count. The Project provides flexibility in some areas to preserve existing houses by increasing possibilities for reinvestment and renovation through internal conversion to smaller units, thereby serving families of all sizes, ages, and configurations. The Residential Infill Project supports "gentle infill": incremental changes to meet our changing housing needs, integrated into the fabric of existing neighborhoods.

### **How the Residential Infill Project Discussion Draft can be better:**

#### *Scale of Houses*

We support capping home sizes to be more compatible with neighborhoods and with Portlanders' housing needs. However, modest changes we recommend include:

- **FAR for duplexes.** Investigate development of new duplexes in Portland and comparable cities/markets, and consider whether a slight increase in FAR for duplexes may increase the likelihood that they will be built. (If relevant, examine this for triplexes as well.)
- **Measuring height.** Consider allowing height of shed roofs to be measured from the mid-point of the shed if the low point of the shed roof is closest to the relevant property line, and if the highest point of the shed is at least twice the legal setback from another site property line.

#### *Housing Opportunity*

The housing choices included in the current "Housing Opportunity Overlay" (Recommendations 5-8) should be allowed in all neighborhoods, not just the proposed Housing Opportunity Overlay Zone. In its current form, this overlay is exclusionary, denying most of East Portland and other neighborhoods the benefits of density needed to support transit access, walkable neighborhoods, and greater housing choices for seniors, young families, and low- to moderate-income households. East Portland is also among the most affordable areas of our city at this time. Therefore, the best way to create

homeownership opportunities for households at/below 80% MFI would be to allow these alternative housing options, coupled with incentives for affordability, in all neighborhoods—but particularly those where land and property values have not yet skyrocketed.

We appreciate the City’s concern that application of the overlay could increase development pressure in areas where people are vulnerable to displacement. We don’t share that concern when a mere 10% of new development on corner lots in single-family zones currently results in a duplex. If the City’s concern is valid, however, it will be a result of scarcity—not enough land within the ‘a’ overlay to meet the demand. There is an easy solution: Increase the amount of land zoned for Housing Opportunity. **If all neighborhoods citywide were allowed the modest proposed increase of one unit per lot, no area would receive too much development pressure.**

Alternative housing types should also be allowed in areas where ROW infrastructure is *not yet* up to City standards. As proposed, much of many neighborhoods with incomplete streets would be excluded from the ‘a’ overlay options. These areas are typically much more cost-effective to develop now, versus waiting until improvements happen, which often trigger significantly higher development costs. So new single family homes could still be built there (and build half street improvements or pay an in-lieu fee), but the same option would not be available for alternative housing types. We should allow the full range of housing options in these neighborhoods too. To this end, we recommend the following changes:

- **Remove the current 'a' overlay.** Allow all housing types, affordable housing bonuses, and incentives for historic preservation and adaptive reuse currently allowed in 'a' everywhere. Instead:
  - **Create a transit or 't' overlay:** In neighborhood areas that are a quarter mile or less from frequent bus service as defined in the current parking code, or a half mile or less from high capacity transit, eliminate on-site parking requirements.<sup>1</sup>
- **Adopt a citywide anti-displacement strategy:** Work with the Anti-Displacement PDX Coalition to identify strategies that will a) mitigate increased displacement pressures for people of color and low-income residents, and b) ensure that this project creates racially and economically equitable outcomes. Strategies should be applied citywide, or wherever the project has an impact, and should be tailored specifically toward most vulnerable populations, wherever they live.
- **Expand incentives for adaptive reuse:** In addition to allowing incentives for preservation and conversion of older housing stock everywhere:
  - *Encourage preservation & adaptation* of homes at least ten years old by allowing them to be internally divided into up to four units.
  - *For historically significant homes:* Strengthen and expand application of 33.445.610.C.2 to more homes, which allows up to one dwelling unit for each 1,000 square feet of site area. Consider no maximum density for historic homes.
  - *For all adaptive reuse projects:* Allow two detached ADUs to be attached to each other, rather than requiring three detached structures. Allow an internal ADU to exceed 800 square feet if it does not exceed one full floor or basement or has three or more bedrooms. Keep provisions that afford greater site and FAR flexibility and that reduce or remove parking minimums.

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<sup>1</sup> We call to attention to this benchmark from Portland-based transit consultant Jarrett Walker: “We generally assume that 400m is a rough upper bound for slow local-stop service, and that for rapid-transit (usually rail) we can expect people to walk up to 1000m or so.” <http://humantransit.org/2011/04/basics-walking-distance-to-transit.html>,

and to this one from Puget Sound Regional Council “Research shows that riders will typically walk up to ½ mile to access high-capacity transit and ¼ mile or more to access bus transit.” <https://www.psrc.org/sites/default/files/tsdluguidancepaper.pdf>

- **Make the affordable housing bonus useable:** The current threshold - 100% of units on a site to qualify for a bonus - is too high. Reinstating a workable bonus scheme would make the development of affordable homes far more feasible for any developer, including non-profits such as Habitat for Humanity, Portland Community Reinvestment Initiatives, or Proud Ground. The bonus should also adequately incent private developers to opt in, thereby encouraging, not stifling, more of the beneficial non-profit/private partnerships being leveraged effectively in Portland today. We recommend adjusting the affordable housing bonus structure to:
  - Allow bonus units [and/or increased FAR] for providing one or more affordable units (up to 80 percent of area Median Family Income).
  - Provide additional FAR for family-sized (2+ bedroom) units utilizing this bonus.
- **Cottage cluster code.** We support staff's recommendation to allow cottage cluster developments on suitable neighborhood sites. However, the current proposal does not produce a development type reflective of cottage clusters as they are known. Alter the proposal to:
  - Draw on cluster codes successfully implemented in other places<sup>2</sup> with key features like reduced home sizes, homes oriented toward shared courtyards, and parking located toward the periphery (if any).
  - Allow, by right, cottage cluster developments that meet these rules.
  - Allow a subdivision approach for cottage clusters to enable fee-simple ownership.
  - Give a density bonus in exchange for the provision of more, smaller homes.
  - Allow a second ADU per home in exchange for a visitability requirement, consistent with staff's proposal for the 'a' overlay.

#### *Narrow Lots*

Development on historically platted narrow lots represents a unique opportunity to share the cost of land among multiple homes, supporting the City's stated goal of providing more housing options at purchase prices that more families can afford. This strategy has been shown to provide deeper affordability than typical single-dwelling homes, especially when coupled with affordable homeownership programs. We support provisions that improve the design & aesthetics of homes built on these historically narrow lots. We also support improvements and clarifications to the R2.5 zone, especially allowing property line adjustments that can help preserve existing housing while adding more, smaller, and more affordable homes. However, to expand space-efficient and more affordable housing options to all parts of the city, we recommend:

- **Rezoning all historically narrow lots from R5 to R2.5.** This flows naturally from an expansion/elimination of the currently proposed 'a' overlay.
- **Alley access.** Many alleys are unimproved, and the cost of grading and paving an alley may be prohibitive and/or access may prove challenging to design and navigate successfully. In these cases, allow exceptions to alley access requirements.

#### *Other Recommendations*

- **Density calculations.** Calculate density before subtracting for ROW dedication, reflecting the fact that a wider sidewalk and planter strip affect the visual experience of a street in much the same way that a larger yard would. This is consistent with the City's current proposal for multi-dwelling zones.
- **Tree preservation.** A healthy urban tree canopy and offering smaller, discreet, and more flexible housing options go hand in hand. Design flexible code provisions that incentivize saving trees

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<sup>2</sup> Here is one example from the City of Langley prepared by the Cottage Company: <http://www.oregon.gov/LCD/TGM/docs/SpaceEfficientHousingReport.pdf> (p. 68-69); Here is another from Grants Pass: <https://www.grantspassoregon.gov/DocumentCenter/View/4685> (section 18.300). NB: Both of these examples display slightly lower densities than might be desirable for more urban Portland infill.

and creating less impervious surface. These incentives could include bonus units, parking requirement changes, and flexibility in building siting and setbacks, among others.

- **Fee-simple ownership options.** Rewrite provisions for mid-block duplexes and corner triplexes (or four-plexes with a bonus) to mimic the current corner duplex code, which allows each unit its own lot, and allows units to be owned separately.
- **Accessibility & visitability.** We appreciate & support staff's attempt to make housing accessible to seniors and those living with disabilities. We suggest a few small changes:
  - Require zero-step (instead of one-step) entries for visitable homes.
  - Utilize a "hammerhead" pivot standard for visitable bathrooms (instead of 60" radius). This will allow visitability to be met in smaller units like ADUs much more feasibly.
  - Consider expedited review, fee waiver, and/or other incentives for fully accessible units.

### **How these changes will help better meet Portland residents' housing needs:**

Portlanders share a desire for our city to be a place where all are welcome and everyone's interests matter, regardless of background, income, or age, whether renter or homeowner. An essential part of achieving this goal is to provide a wide array of housing options throughout our community.

The Residential Infill Project is long overdue, as Portland faces a housing crisis and increasingly large areas of our city have become unaffordable for residents of all incomes, and especially those of middle- and lower incomes. A successful Residential Infill Project will open all our neighborhoods to a wider range of housing options that are harmonious with surrounding homes.

A choice among downtown high-rises, five-story apartment buildings along certain corridors, and larger single-family homes misses the housing needs of many Portlanders. The majority of residential land in Portland is zoned to effectively leave out the young couple who has not yet started a family, the 70-something widow, and the single parent with 1 or 2 children. For young adults starting out on their own, saddled with college debt, smaller, flexible housing options like ADUs and duplexes might put first-time homeownership within reach. For Baby Boomers, the flexibility to downsize into retirement could yield senior-friendly options within existing communities, like an accessibly-built granny cottage or a flat within a larger home.

It is time to bring our zoning code into line with the needs of our families - today and tomorrow. Almost 2/3 of Portland households consist of 1-2 persons, and both Millennials and Baby Boomers are seeking more affordable, more accessible, and more flexible housing options. The "Housing Choice" portion of the Residential Infill Project Discussion Draft would re-legalize some of these, including duplexes, triplexes, rowhouses, accessory dwellings, and cottage clusters. Diversity in housing options can be especially important for families of color, helping to address historic and long-term inequities that have kept generation after generation from achieving homeownership.

Allowing more compact, diverse housing types in all residential neighborhoods serves the desire for walkable, less-auto-dependent urban living, while helping meet Portland's climate and sustainability goals. Smaller, residential-scale housing allows more tree canopy. And, smaller housing types are more affordable to construct per square foot than higher density forms of multi-family housing that require elevators, sprinkler systems, and adherence to commercial building codes. Finally, these housing options support population densities necessary to foster vibrant, walkable neighborhoods - as evidenced by older Portland neighborhoods built out with a mix of housing types.

The October 2017 Project Discussion Draft is heading in the right direction by increasing housing choices and scaling down allowable home sizes. Adopting the key changes outlined above will greatly improve the proposal's ability to deliver more flexible and affordable housing options to Portlanders.

December 1, 2017

TO: Portland Bureau of Planning and Sustainability

FROM: Anti-Displacement PDX coalition (contact: Cameron Herrington, cameronh@livingcully.org)

RE: Residential Infill Project Discussion Draft

The Anti-Displacement PDX (ADPDX) coalition is pleased to share this feedback on the Discussion Draft of the Residential Infill Project. While we appreciate that this draft takes steps toward implementing some of the new Comprehensive Plan's anti-displacement policies, we believe that the RIP can and must do much more to prevent displacement, expand access to affordable housing, and create equitable outcomes for people of color and lower-income households. We are concerned that the current draft attempts to reduce displacement pressures in the short-term -- and only in select neighborhoods -- at the cost of limiting housing choice and reinforcing spatial disparities in the long-term. We call on BPS to employ a more robust, proactive set of tools to achieve equitable outcomes from this project.

ADPDX was formed in 2015 as a voice for communities that have experienced and continue to be vulnerable to gentrification and displacement, in order to shape Portland's 2035 Comprehensive Plan. Our coalition is comprised of community-based organizations representing people of color, low-income Portlanders, renters, housing providers, and advocates for affordable housing and equitable development. We are proud that we contributed to the inclusion of over 30 policies in the final Comprehensive Plan that advance our goals of preventing displacement, ensuring equitable benefits from development, redressing the harms of gentrification, and expanding Portland's affordable housing infrastructure.

We appreciate that BPS has sought to implement ADPDX-backed Comprehensive Plan policies through the RIP and through the public engagement process surrounding this project:

- The RIP directly implements Comprehensive Plan policy 5.6 - Middle housing;
- As required by Chapter 2 policies, BPS has engaged with ADPDX and its member organizations to facilitate the informed participation of under-represented communities in planning and decision-making;
- BPS has analyzed the RIP's potential impacts on housing costs and displacement pressures, as required by Comprehensive Plan policies such as 5.15 - Gentrification/displacement risk (though we are not fully satisfied with this analysis, as discussed below).

While these steps are important, the current draft of the RIP does not meet ADPDX's expectations for how a major planning initiative must address questions of equity, inclusion, displacement prevention, and housing opportunity. As one of the first citywide planning projects to be carried out under the auspices of the new Comprehensive Plan, RIP should set a strong precedent for how City bureaus will implement the required gentrification/displacement risk analysis -- which must include the identification of measures to both mitigate any displacement pressures associated with the project *and* advance affordable housing and equitable development goals as part of the project.

The displacement risk analysis carried out for the RIP is overly (perhaps entirely) dependent on a spatial analysis that seeks to identify discrete geographies where renters are at elevated risk of displacement. This analysis is insufficient, and has led to the selection of a flawed, spatially-constrained mitigation measure. BPS should take advantage of the opportunity presented by the RIP to develop a much more robust impact analysis tool that can be used not only for this project, but for subsequent projects across all City bureaus. At a minimum, this impact analysis protocol should: 1) identify any increased displacement risk posed by the project; 2) identify populations that may be particularly impacted (across all neighborhoods/geographies affected by the project scope); and 3) specify appropriate measures to both mitigate potential displacement risks *and* proactively expand affordable housing opportunities for people of color and lower-income households. Anti-Displacement PDX is eager to work closely with BPS to develop this impact analysis protocol, and to apply it to the Residential Infill Project.

In line with developing a better impact analysis and mitigation protocol, we call on BPS to make the following revisions to the Discussion Draft of the RIP:

**1. Allow the “Housing Opportunity” development options citywide.**

To our knowledge, BPS’ analysis of the displacement risk posed by the RIP consists of a map showing where low-income renters of single-family homes are concentrated, and the sole proposed mitigation measure is to exclude those geographies from the “housing opportunity” zone altogether. While we agree that renters of single-family homes may be at increased risk of displacement in the short-term (due to increased incentive for their landlords to redevelop or sell their properties), we do not agree that only those living in certain neighborhoods are deserving of protection from displacement. Nor do we agree that excluding these neighborhoods from the housing opportunity zone is an appropriate response to the potential displacement risk (see below for our proposed anti-displacement measures).

Increased housing opportunity is needed in all neighborhoods in order to reduce upward pressure on housing costs and rents, and to provide access to walkable, amenity-rich neighborhoods. Attempting to reduce displacement pressure in the short-term using a tool that limits housing opportunity and exacerbates spatial disparities in the long-term is counterproductive.

Furthermore, excluding certain geographic areas from the housing opportunity zone creates unnecessary complexity in the zoning map, and threatens to distort the market in unpredictable ways. Allowing additional housing supply citywide will more evenly distribute any increased redevelopment and displacement pressure, rather than placing low-income renters in some neighborhoods at greater risk -- which is particularly dangerous given Oregon’s lack of tenant protections, and exacerbates the risk for households of color and low-income renters.

Applying the new rules to all areas of the city meets the spirit of several Comprehensive Plan policies, including Policy 3.3 (“Guide development, growth and public facility investment to reduce disparities...”); Policy 5.10 (“Overcome disparities in access to community assets, and enhance housing choice for people in protected classes throughout the city...”); and Policy

5.11 (“Remove potential regulatory barriers to housing choice for people in protected classes to ensure freedom of choice in housing type, tenure, and location.”).

## **2. RIP must both prevent displacement *and* increase opportunity for people of color and lower-income households.**

Rather than simply hoping to avoid harm in the short-term by excluding neighborhoods from the housing opportunity zone, ADPDX calls for an approach that 1) Reduces displacement risk citywide long-term, and 2) Takes advantage of this major zoning project to proactively, preferentially *increase* housing opportunity for people of color and lower-income households (i.e. “affirmatively further fair housing” opportunities, as required by Comp Plan Policy 5.10). This means using a broader set of tools -- all called for by the Comprehensive Plan -- to both mitigate displacement pressures for private-market renters and ensure that significant numbers of new affordable homes result from implementation of the RIP. As the Comp Plan’s impact analysis policies require (e.g. Policy 5.12), these tools should be implemented concurrent to the implementation of the RIP:

- **TOOL 1: Capture value created by increased development allowances in order to expand affordable housing infrastructure and protect renters**
  - Rather than granting the Housing Opportunity Zone’s increased development capacity by right, require property owners to demonstrate that they will make some contribution to affordable housing in order to receive the increased development allowances (and, therefore, increased property value). Options that applicants can choose from should include:
    - Inclusion of an affordable unit on the property (this option could also grant the property owner the right to build one additional unit, as described below in Tool 3);
    - In lieu payment to the Housing Bureau, with funds earmarked for land acquisition and affordable housing development in single-dwelling zones;
    - Retain existing tenants at affordable rents (this option could be further incentivized, as described below in Tool 4).
  - **Supported by Comp Plan policies:**
    - Policy 3.3.d - Equitable development: Incorporate requirements into the Zoning Code to provide public and community benefits as a condition for development projects to receive increased development allowances.
    - Policy 3.3.e - Equitable development: When private property value is increased by public plans and investments, require development to address or mitigate displacement impacts and impacts on housing affordability, in ways that are related and roughly proportional to these impacts.
    - Policy 5.54 - Renter protections: Enhance renter health, safety, and stability through education, expansion of enhanced inspections, and support of regulations and incentives that protect tenants and prevent involuntary displacement.

- **TOOL 2: Acquire properties in single-dwelling zones for development of affordable infill housing, and to prevent displacement of renters**
  - Allocate funds that can be used citywide by nonprofit housing providers to acquire properties that benefit from the RIP's increased development allowances.
  - Prioritize acquisition of properties currently being rented to lower-income tenants, in order to prevent their displacement and provide them with long-term safe, healthy, and stable housing -- either in their current unit or as part of new development on the property.
  - Prioritize acquisition of properties in neighborhoods where property values are projected to increase in the near future.
  - Enact policy and programs to help low- and moderate-income tenants purchase their homes when landlords sell.
  - **Supported by Comp Plan policies:**
    - Policy 5.14 - Preserve communities: Encourage plans and investments to protect and/or restore the socioeconomic diversity and cultural stability of established communities.
    - Policy 5.17 - Land banking: Support and coordinate with community organizations to hold land in reserve for affordable housing, as an anti-displacement tool, and for other community development purposes.
    - Policy 5.18 - Rebuild communities: Coordinate plans and investments with programs that enable communities impacted by involuntary displacement to maintain social and cultural connections, and re-establish a stable presence and participation in the impacted neighborhoods.
    - Policy 5.19 - Permanently affordable housing: Increase the supply of permanently affordable housing, including both rental and homeownership opportunities.
    - Policy 5.54 - Renter protections: Enhance renter health, safety, and stability through education, expansion of enhanced inspections, and support of regulations and incentives that protect tenants and prevent involuntary displacement.
- **TOOL 3: Reconfigure the Affordable Housing density bonus so that it results in more affordable homes citywide**
  - Rather than require that *all* units be affordable to lower-income households in order for a property owner to receive the density bonus, require that *one or more* of the units be affordable. This will allow greater flexibility for developers of all kinds -- nonprofit, for-profit, and partnerships between the two -- to develop affordable infill homes, including in neighborhoods where land values are too high to allow for all of the units to be sold at below-market prices. This change would have no detrimental effect for subsidized projects developed by non-profits, in which all units will be affordable under either scenario. However,

- it will make it possible for other projects (e.g. those without sufficient subsidy, or in neighborhoods with high land costs) to include one or more affordable units, which would not be the case under the rules proposed in the discussion draft.
- Provide a FAR or lot-coverage-ratio incentive in exchange for family-sized units (3 bedrooms or more) on properties that utilize the affordability bonus.
  - As an alternative, explore the following:
    - For family-sized units, increase the income cap to no more than 100 percent of the median family income. Housing opportunities for families at or below the area's median income are extremely limited.
    - Provide the bonus in exchange for *either* one unit affordable at 80% MFI, *or* two units affordable at 100% MFI.
  - **Supported by Comp Plan policy:**
    - Policy 5.35: Inclusionary Housing. ...Effectively link the production of affordable housing to the production of market-rate housing.
- **TOOL 4: Create incentives for property owners to rent units in single-dwelling zones at affordable rates to lower-income tenants**
    - Provide incentives for landlords in single-dwelling zones to 1) retain existing lower-income tenants; and 2) rent to additional lower-income tenants.
    - Incentives could include: Granting transferable development rights that could be sold to other property owners; Property tax abatements; SDC waivers; Subsidized weatherization or other home repairs.
    - **Supported by Comp Plan policies:**
      - Policy 5.13 - Housing stability: Coordinate plans and investments with programs that prevent avoidable, involuntary evictions and foreclosures.
      - Policy 5.54 - Renter protections: Enhance renter health, safety, and stability through education, expansion of enhanced inspections, and support of regulations and incentives that protect tenants and prevent involuntary displacement.
  - **TOOL 5: Fund displacement prevention and mitigation tools through existing sources (such as the Housing Investment Fund) and/or create a fund specifically focused on anti-displacement programs and initiatives.**
    - Increase funding opportunities for organizations that provide education and services to tenants to help prevent displacement.
    - Continue to refine displacement impact analysis and prioritize highest-risk populations and/or neighborhoods for displacement prevention funding, initiatives and housing.



9200 SE Sunnybrook Boulevard, #410 | Clackamas, OR 97015  
1-866-554-5360 | Fax: 503-652-9933 | TTY: 1-877-434-7598  
aarp.org/or | oraarp@aarp.org | twitter: @aarpor  
facebook.com/AARPOregon

Portland Bureau of Planning & Sustainability  
1900 SW 4th Ave, Suite 701  
Portland, OR 97204  
Attn: Residential Infill Project staff  
November 30, 2017

Dear City of Portland staff,

On behalf of over 65,000 members residing in the City of Portland, AARP Oregon offers these comments on the recent city discussion draft for the Residential Infill Project. AARP commends the city and staff for your hard work and continued commitment to expanding housing options in the city.

Overall, we believe the draft is headed in the right direction. In particular, we support the goals of expanding housing choice in terms of size and types of homes, encouraging walkable communities so people have easier access to amenities, services and supports, and prioritizing the preservation of neighborhood character and existing homes.

Last, year we had submitted testimony calling on the city to fill a major gap– the absence of any provision to foster and encourage increased stock of accessible housing. We wrote that “without adequately addressing this issue the proposed recommendations are unacceptable and cannot make for an effective plan to guide future development in the city that meets the needs of all its populations.”

This year we are excited to see accessibility and visitability policy language in the draft. We applaud the city for the responsiveness and for listening. However, we also believe that the policy proposed is incremental whereas the need for accessible homes is much more serious considering the dearth of accessible housing stock in our current market, the rapid aging of our communities, and prevalence of physical disability in the general population.

Over the next 15 years, our region is expected to see a 106.4% growth in people 65+ compared to a projected 35% growth for the general population. AARP research tells us that 90% of people 65 and older want to remain in their homes and communities as they get older. Affordable and accessible housing is fundamental to quality of life for people of all ages and abilities, family compositions, incomes and backgrounds. However, the current housing crisis means that there are fewer options for older adults, people with disabilities, those living on low and fixed incomes. Through the Residential Infill Project, the city has an important opportunity to address housing options that address both affordability AND accessibility.

Real Possibilities

In light of this, we urge the city to:

1. **Make the visibility requirement the basic threshold for ALL new infill construction**, whether ADUs, duplexes, triplexes, etc., with exceptions allowed only for verifiable cases where the build site makes a no-step entry impossible.
2. **Correct the current interpretation of “visitability”** that allows “low-step” and replace that with a simple “no-step entry” requirement.
3. **Consider offering expedited review, fee waiver, and/or other incentives for fully accessible units for ALL housing types.**

In addition, we echo and support some crucial comments that other groups, including Portland for Everyone, Build Small Coalition and also the Co-chairs of the Age-Friendly Portland initiative, have already offered, and urge the city to:

- ***Allow the “Housing Opportunity Overlay” provisions in ALL neighborhoods***
- ***Expand incentives for adaptive reuse***
- ***Improve the proposed cottage clusters policies***
- ***Incentivize stacked flats***

Thank you for this opportunity to continue our involvement in the development of the Residential Infill Project and expand housing options for ALL in Portland. We feel important changes are being made to make our city a great place for people of all ages and abilities. Please don't hesitate to contact Bandana Shrestha in the AARP Oregon office at 503-513-7368 or at [bshrestha@aarp.org](mailto:bshrestha@aarp.org).

Sincerely,



Gerald J. Cohen, J.D., M.P.A.  
State Director



# Age-Friendly

PORTLAND & MULTNOMAH COUNTY

November 30, 2017

Portland Bureau of Planning & Sustainability  
1900 SW 4th Ave, Suite 701  
Portland, OR 97204  
Attn: Residential Infill Project staff

Dear City of Portland staff:

After reviewing the *Residential Infill Project Discussion Draft*, as the co-coordinators of the Age-Friendly Portland Advisory Council we are submitting the following public comments pertaining to provisions that we support and recommendations for changes.

Areas of support:

- *Expanding housing opportunities for Portlanders, in general, and people with disabilities, in particular.* This provision includes the creation of a Housing Opportunity Overlay Zone, which would be beneficial to people with disabilities as it would increase housing options with better access to transit and services. (Note: using a 0.25 mile catchment area to determine the overlay zone is a good metric for examining access for people with mobility limitations.) This could also lead to increases in the supply of housing in areas of the city that can support additional density, therefore improving access to healthy, connected communities.
- *Increasing the potential for additional “middle housing” choices such as Accessory Dwelling Units (ADUs) and cottage clusters.* “Middle housing” includes housing types that are compact and carry the potential for increasing social contact and reducing isolation. Also, allowing middle housing types may increase the supply of housing in neighborhoods in which it is becoming increasingly difficult to find affordable rentals and homes for sale. Although these housing types may have smaller footprints, it is still possible to design ADUs and cottage housing to be visitable/accessible.
- *Allowing additional housing types in the new ‘a’ overlay if one of the units is “visitable.”* This provision is consistent with policies in the Portland Plan and Comprehensive Plan and begins to move Portland toward becoming a place that can better accommodate people with mobility-related disabilities.

## Recommendations for changes:

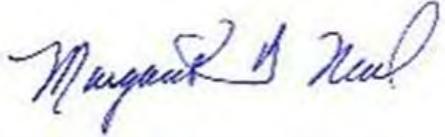
- *The visitability policy should be changed in order to be consistent with best practice.* Visitability is most often defined by three basic criteria (National Council on Independent Living, 2017):
  - a. One zero-step entrance
  - b. Doors with 32 inches of clear passage space
  - c. One bathroom on the main floor which is accessible for someone using a wheelchair

The new visitability requirement stipulates that “the dwelling must have a no- or *low*-step entry.” Including a *low*-step entrance option, in addition to the zero-step entrance, is not advised. In effect, the policy as written, would render the unit “*un-visitabile*” for people using mobility devices unable to cross a low-step threshold. In particular, for a person using a power wheelchair, the combined weight of the chair and person may be 500 pounds or more; to enter a dwelling with a step would require lifting the visitor and chair or modifying the low step. We recommend either: (a) eliminating the low-step option, or (b) instead, requiring a “threshold barrier” (i.e., a barrier that would keep water out, allow people in, but would not be a step); this would maintain the ability for someone using a mobility device to enter the home. Additional consultation with designers, developers, and end users is advised to determine code specifics.

- *The cottage clusters policies should include a visitability requirement.* Cottage clusters are an ideal housing type for creating an inclusive community that meets needs across the life course. Cottage clusters have the potential to be sustainable, socially-oriented and interdependent. We suggest that all cottages, or at least a significant proportion of them, be required to be built with a visitability requirement, modified as suggested above.
- *Stacked flats (i.e., housing units that are stacked one on top of the other, rather than being built side-by-side) should be encouraged or incentivized.* The desired outcome would be to reduce the development of side-by-side multilevel homes, which are not accessible by people with mobility impairments. The bottom unit of a stacked flat should be required to meet the visitability criteria suggested above.
- *Additional ways should be explored to increase the affordability of new housing types allowed in the proposed overlay zone.* Increasing the supply of housing alone will not address the gap that exists between the need for and availability of affordable housing.

We thank the Bureau of Planning and Sustainability for its efforts in working with older adults and stakeholders from the Age-Friendly Portland initiative. We hope to be involved in the next steps of this residential infill project. Should you have any questions, please don't hesitate to contact Margaret at 503.725.5145 or [nealm@pdx.edu](mailto:nealm@pdx.edu) or Alan at 503.725. 5134 or [aland@pdx.edu](mailto:aland@pdx.edu).

Sincerely,

A handwritten signature in blue ink that reads "Margaret B. Neal". The signature is fluid and cursive.A handwritten signature in black ink that reads "Alan DeLaTorre". The signature is written in a cursive style within a rectangular box.

Margaret B. Neal, Ph.D., Director, Institute on Aging, Portland State University, and Alan DeLaTorre, Ph.D., Research Associate, Institute on Aging, Portland State University Co-coordinators, Age-Friendly Portland Initiative, [agefriendlyporland.org](http://agefriendlyporland.org)

# PORTLAND COMMISSION ON DISABILITY



Portland Bureau of Planning & Sustainability  
1900 SW 4th Ave, Suite 701  
Portland, OR 97204  
Attn: Residential Infill Project staff

November 30, 2017

Dear City of Portland staff,

After reviewing the *Residential Infill Project Discussion Draft*, the Portland Commission on Disability's (PCOD) Accessibility in the Built Environment (ABE) Committee would like to submit the following public comments.

To begin, it is critically important to provide a brief snapshot of local disability-related trends. The following passages regarding disability and equity come from the paper titled *Disparities in Access and Opportunity for Persons with Disabilities in Portland (Sporluk, 2014)*:

On average, 15-20% of the population is persons with disabilities. Persons with disabilities are members of every racial/ethnic group, every age group, and every socioeconomic classification. Disability comes in many forms and can impact every aspect of life. Persons with disabilities have historically been marginalized by society, and much work remains to be done to level the playing field and provide equal opportunity for those affected by disability. (P. 1)

One of the primary equity concerns for persons with disabilities in our region is the availability and distribution of accessible housing options. The vast majority of our housing supply is inaccessible to persons with mobility impairments. Most single-family housing utilizes traditional design elements such as stepped entrances and multilevel layouts that are problematic or simply unusable for those who use assistive devices. It often includes internal design deficiencies such as narrow doorways and insufficient clearances that are impossible to navigate for persons who use wheelchairs. (P.3)

Based on data available at the time, Sporluk's report noted the following ranges of disability prevalence rates by race: Black/African-American (17.5-32.0%), White (15.5-21.0%), Asian (12.4%), and Hispanic (10.0-13.0%). It is fair to say that not only is disability an equity issue that must be addressed, but that certain sub-populations face hardships with respect to disabilities that should be considered.

*In compliance with Civil Rights laws, it is the policy of the City of Portland that no person shall be excluded from participation in, denied the benefits of, or be subjected to discrimination in any City program, service, or activity on the grounds of race, color, national origin, or disability. To request accommodations, translation and/or interpretation, to file complaints, or for additional information or services, please contact us at 503-823-4433, City TTY 503-823-6868, or Oregon Relay Service: 711.*

With respect to the *Residential Infill Project Discussion Draft*, PCoD's ABE Committee would like to offer general support for the draft report while also offering the following statement: **As proposed, the proposed policies related to the Residential Infill Project need to be improved for the City to move toward meeting the growing needs of Portlanders with disabilities.**

Areas of support:

- *Expanding housing opportunities for Portlanders, in general, and people with disabilities, in particular.* This includes the creation of a Housing Opportunity Overlay Zone which would be beneficial to people with disabilities as it would provide better access (1/4 mile is better than 1/2 mile for people with mobility limitations) to transit and service options, as well as the possibility of affordable housing in areas of the city that are currently too expensive to rent or buy a housing unit.
- *Increasing the potential for additional "middle housing" choices such as Accessory Dwelling Units (ADUs) and cottage clusters.* Although these are smaller-style homes, it is possible to design ADUs and cottage housing to be visitable/accessible.
- *The provision to allow for additional housing units in exchange for visitable design.* This provision is consistent with policies in the Portland Plan and Comprehensive Plan and begins to move Portland toward becoming a place that can better accommodate people with mobility-related disabilities.

Areas of concern:

- *The visitability policy needs to be improved to match the origin of the concept.* Visitability is most often defined by three basic criteria: (1) one zero-step entrance. (2) doors with 32 inches of clear passage space. (3) one bathroom on the main floor you can get into in a wheelchair (National Council on Independent Living, 2017). The new visitability requirement stipulates that "the dwelling must have a no- or low-step entry." **The change to require a low-step entrance, rather than requiring a zero-step entrance, is a fundamental flaw. Portland should not become a pioneer in "watering down" the concept of visitability.** In effect, the policy, as written, would render the unit as "un-visitable" for people in mobility devices that are unable to cross that threshold. In particular, for a person in a power wheel chair, it is common for the combined weight of the chair and person to be 500 pounds or more. Therefore, we recommend either eliminating the low-step option or changing the requirement to create a "threshold barrier" (i.e., a barrier that would keep water out, allow people in, but would not be a step/tread); this would maintain the ability for someone in a mobility device to enter the home.
- *Cottage clusters policies can be improved.* Cottage clusters are ideal for creating community, developing properties in a sustainable manner, and master planning small communities. However, there are no requirements for visitability and we suggest that cottages are also required to be built with visitability requirements suggested in the first area of concern, listed above. At least consider a percentage of cottages to be built to visitable standards.
- *Stacked flats (i.e., housing units that are stacked one on top of the other, rather than side-by-side) should be encouraged or incentivized in the plan.* The desired outcomes would be to reduce the development of side-by-side multilevel homes that would not be accessible by people with mobility impairments. The bottom unit of a stacked flat should be required to meet the visitable criterion mentioned above.

We would also like to thank the Bureau of Planning and Sustainability for their efforts in working with the disability community during the residential infill project. We hope to be involved in the next steps of this project.

Sincerely,

Portland Commission on Disability, Accessibility in the Built Environment Committee

CC:

Nickole Cheron

Larry Cross

Brenda Jose

Alan DeLaTorre

References:

National Council on Independent Living (2017). Retrieved from: <https://visitability.org/>

Szporluk, Michael (2014). Disparities in Access and Opportunity for Persons with Disabilities in Portland. Coalition for a Livable Future, Equity White Paper Series. Retrieved from: [http://regionalequityatlas.org/sites/rea.tumblehome.com/files/pdfs/disparities\\_in\\_access\\_and\\_opportunity\\_for\\_persons\\_with\\_disabilities\\_in\\_portland.pdf](http://regionalequityatlas.org/sites/rea.tumblehome.com/files/pdfs/disparities_in_access_and_opportunity_for_persons_with_disabilities_in_portland.pdf)



Portland Bureau of Planning & Sustainability  
1900 SW 4th Ave, Suite 701  
Portland, OR 97204

Attn: Residential Infill Project staff

November 30, 2017

Dear City of Portland staff,

After reviewing the Residential Infill Project Discussion Draft, the Portland Commission on Disability's (PCOD) Accessibility in the Built Environment (ABE) Committee would like to submit the following public comments.

To begin, it is critically important to provide a brief snapshot of local disability-related trends. The following passages regarding disability and equity come from the paper titled Disparities in Access and Opportunity for Persons with Disabilities in Portland (Sporluk, 2014):

On average, 15-20% of the population is persons with disabilities. Persons with disabilities are members of every racial/ethnic group, every age group, and every socioeconomic classification. Disability comes in many forms and can impact every aspect of life. Persons with disabilities have historically been marginalized by society, and much work remains to be done to level the playing field and provide equal opportunity for those affected by disability. (P. 1)

One of the primary equity concerns for persons with disabilities in our region is the availability and distribution of accessible housing options. The vast majority of our housing supply is inaccessible to persons with mobility impairments. Most single-family housing utilizes traditional design elements such as stepped entrances and multilevel layouts that are problematic or simply unusable for those who use assistive devices. It often includes internal design deficiencies such as narrow doorways and insufficient clearances that are impossible to navigate for persons who use wheelchairs. (P.3)

Based on data available at the time, Sporluk's report noted the following ranges of disability prevalence rates by race: Black/African-American (17.5-32.0%), White (15.5-21.0%), Asian (12.4%), and Hispanic (10.0-13.0%). It is fair to say that not only is disability an equity issue that must be addressed, but that certain sub-populations face hardships with respect to disabilities that should be considered. Final Payment Authorization Revised 11/2016 With respect to the Residential Infill Project Discussion Draft, PCoD's ABE Committee would like to offer general

**211 SE 80<sup>th</sup> Avenue, Portland, Oregon 97215**  
**503-234-6167 • fax 503-234-9980**  
**e-mail: [info@unlimitedchoices.org](mailto:info@unlimitedchoices.org) • [www.unlimitedchoices.org](http://www.unlimitedchoices.org)**

support for the draft report while also offering the following statement: **As proposed, the proposed policies related to the Residential Infill Project need to be improved for the City to move toward meeting the growing needs of Portlanders with disabilities.**

Areas of support:

- Expanding housing opportunities for Portlanders, in general, and people with disabilities, in particular. This includes the creation of a Housing Opportunity Overlay Zone which would be beneficial to people with disabilities as it would provide better access (1/4 mile is better than 1/2 mile for people with mobility limitations) to transit and service options, as well as the possibility of affordable housing in areas of the city that are currently too expensive to rent or buy a housing unit.
- Increasing the potential for additional “middle housing” choices such as Accessory Dwelling Units (ADUs) and cottage clusters. Although these are smaller-style homes, it is possible to design ADUs and cottage housing to be visitable/accessible.
- The provision to allow for additional housing units in exchange for visitable design. This provision is consistent with policies in the Portland Plan and Comprehensive Plan and begins to move Portland toward becoming a place that can better accommodate people with mobility related disabilities.

Areas of concern:

- The visitability policy needs to be improved to match the origin of the concept. Visitability is most often defined by three basic criteria: (1) one zero-step entrance. (2) doors with 32 inches of clear passage space. (3) one bathroom on the main floor you can get into in a wheelchair (National Council on Independent Living, 2017). The new visitability requirement stipulates that “the dwelling must have a no- or low-step entry.” The change to require a low-step entrance, rather than requiring a zero-step entrance, is a fundamental flaw. Portland should not become a pioneer in “watering down” the concept of visitability. In effect, the policy, as written, would render the unit as “un-visitable” for people in mobility devices that are unable to cross that threshold. In particular, for a person in a power wheel chair, it is common for the combined weight of the chair and person to be 500 pounds or more. Therefore, we recommend either eliminating the low-step option or changing the requirement to create a “threshold barrier” (i.e., a barrier that would keep water out, allow people in, but would not be a step/ tread); this would maintain the ability for someone in mobility device to enter the home.
- Cottage clusters policies can be improved. Cottage clusters are ideal for creating community, developing properties in a sustainable manner, and master planning small communities. However, there are no requirements for visitability and we suggest that cottages are also required to be built with visitability requirements suggested in the first area of concern, listed above. At least consider a percentage of cottages to be built to visitable standards.

- Stacked flats (i.e., housing units that are stacked one on top of the other, rather than side-by-side) should be encourage or incentivized in the plan. The desired outcomes would be to reduce the development of side-by-side multilevel homes that would not be accessible by people with mobility impairments. The bottom unit of a stacked flat should be required to meet the visitable criterion mentioned above.

We would also like to thank the Bureau of Planning and Sustainability for their efforts in working with the disability community during the residential infill project. We hope to be involved in the next steps of this project.

Sincerely,



Brenda Jose, Executive Director

~ Serve on Portland Commission on Disability, Accessibility in the Built Environment

From: "Allen Hines" <allen.hines@gmail.com>

Date: Dec 1, 2017 1:55 PM

Subject: Comments on the Residential Infill Project

To: <nickole.cheron@portlandoregon.gov>, "Josiah Barber" <josiahabarber@gmail.com>, <joanne.johnson@portlandoregon.gov>

Cc:

Hi Nickole, Joanne, and Josiah,

I'm sharing comments that my organization, the Real Choice Initiative, submitted regarding the RIP. I hope you're well.

Allen

The Real Choice Initiative is committed to reducing inequity in access to housing in Multnomah County by advocating for expanded housing opportunities for people with disabilities. As Portland's city center grows taller and other parts grow denser through the construction of ADUs, the City must realize its vision of inclusivity set forth in the Portland Plan and continuing into the Comprehensive Plan.

We are encouraged by visitability standards that are part of the Residential Infill Project. Visitability encourages community inclusion of people with disabilities by mandating that we, too, have a way into friends' homes and a bathroom to use. The last point is a matter of dignity. Still, we have concerns that the Residential Infill Project is a means to resolve the housing crisis, yet it insufficiently addresses the need for units where people with disabilities can live sustainably. Creating places where people can visit but cannot live comfortably does not meet the housing needs of the disability community.

The increased density proposed in section 5 of the project summary published in October 2017 is a good incentive for the creation of more housing units that meet visitability requirements. Visitability alone, however, is a minimal requirement for creating accessible communities. To us, creating "housing opportunities" by way of the Residential Infill Project necessitates access to all amenities a housing unit provides and concerted action to ensure accessible units are in fact built..

We respectfully request that the City track the construction of accessible housing, verify accessibility standards are met, and include these units in efforts to support the disability community to find suitable housing (i.e., an accessible housing inventory). At minimum, a housing program promoted by the City should meet Universal Federal Accessibility Standards in terms of the percentage of accessible units created.

Under section 7, we respectfully request that parking requirements consider the needs of people who use wheelchairs or have other mobility concerns. While we recognize there are a great many beautiful and historic neighborhoods in Portland, we are concerned that waivers for new units where parking is scarce could make those units inaccessible due to the likelihood of needing to park a considerable distance from the destination.



**National Trust for  
Historic Preservation**  
*Save the past. Enrich the future.*

30 November 2017

Susan Anderson, Director  
City of Portland Bureau of Planning and Sustainability  
1900 SW 4th Avenue, Suite 7100  
Portland, OR 97201  
By e-mail to: [residential.infill@portlandoregon.gov](mailto:residential.infill@portlandoregon.gov)

Re: Portland Residential Infill Project Discussion Draft

Dear Ms. Anderson:

I am writing on behalf of the National Trust for Historic Preservation and the Preservation Green Lab. The National Trust is a privately funded nonprofit organization that works to save America's historic places. Our Preservation Green Lab conducts research, delivers tools, promotes policies, and convenes partners to promote older buildings and neighborhoods as essential elements of sustainable, equitable, and affordable cities.

The National Trust takes a keen interest in the City of Portland's Residential Infill Project, which contemplates overhauling the rules affecting development in most of Portland's single-dwelling residential zones. We recognize the severity of Portland's affordable housing crisis, and support creative approaches to ensure that affordable housing is available for current and future Portlanders.

We applaud efforts to address the disconnect between a growing need for smaller, more affordable housing, and market trends that have resulted in the production of mostly larger houses. Portland has been a national leader in promoting Accessory Dwelling Units (ADUs) as a strategy to provide a mix of housing options without demolishing existing housing, and we are confident that there are opportunities to build on that track record.

The Residential Infill Project has a stated goal to assure that additional housing units are carefully introduced in a way that complements the scale of single-dwelling neighborhoods and maintains their distinct character. The project also seeks to promote preservation of historic resources when adding units through incentives such as waived parking requirements, additional FAR and flexibility in housing types.

While we strongly support the provision of meaningful incentives for the preservation of historic resources (and disincentives for their demolition), these provisions must be conceived

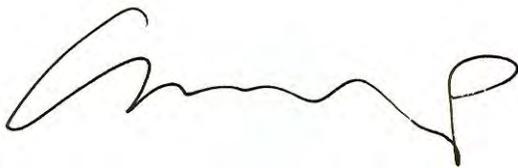
and evaluated within the context of Oregon's onerous historic property designation consent statute, which since 1995 has had a paralyzing effect on Portland's historic preservation program.

The vast majority of properties potentially impacted by the Residential Infill Project is over 50 years of age and thus may be eligible for historic designation, but only a small fraction of these properties has been designated. Last updated in 1984, Portland's Historic Resources Inventory is woefully out-of-date, leaving planners operating in the dark regarding potential impacts to historic resources. Any incentives and protections incorporated in the Residential Infill Project that apply to only designated properties would leave thousands of potentially historic properties vulnerable to demolition.

Overcoming obstacles to coherent historic resource protection created by Oregon's owner consent law will be challenging. An important opportunity exists in the Bureau of Planning and Sustainability's historic resources zoning code project, which will propose changes to how the City of Portland identifies, designates and protects historic resources. Given that the historic resources project's stated goal to better align the city's historic preservation programs with other community goals, it is essential that these efforts are incorporated in the Residential Infill Project before it is finalized and implemented.

The National Trust and the Preservation Green Lab support policy reforms that advance affordable housing goals without compromising the legitimate public interest in well-designed, resilient, and healthy communities rich in history. We look forward to the opportunity to participate in the formal public review process as the Residential Infill Project is considered by the Planning and Sustainability Commission and City Council in the coming months.

Sincerely,

A handwritten signature in black ink, appearing to read 'Anthony Veerkamp', written in a cursive style.

Anthony Veerkamp  
Director of Policy  
Preservation Green Lab

## **PCHR COMMENTS TO BPS ON 33.405.070 “ADDITIONAL REGULATIONS FOR HISTORIC RESOURCES”.**

- 1. As a general matter, it should be unambiguous that all existing requirements for Historic Resource Review remain effective and shall supersede 33.405.070.** In other words, if HRR is otherwise required (e.g. Historic Landmark, contributing structure in historic district, etc), it should be clear that 33.405.070 may not provide an alternative regulatory path to bypass HRR and the application of 33.846.060(G), district-specific design guidelines, or Community Design Standards, or to permit alterations not approved through HRR. *Reason: need to avoid ambiguity or create a loophole to evade HRR. Consider clarifying language similar to 33.445.610 (“The building may be expanded and the new net building area used for additional dwelling units only if the expansion is approved through historic resource review.”),*
- 2. It should be clear that this regulation applies only to historic resources within in the HOOZ ‘a’ overlay.** *Reason: in areas deemed unsuitable for the HOOZ, there is no reason to allow density in historic resources at levels deemed unsuitable for the rest of the neighborhood (unless the provisions of 33.445.610 apply, including covenant).*
- 3. Subpart C.1. This subpart potentially conflicts with Goal 5’s prohibition of demolition of historic resources and definition of “demolition”:** *“(a) “Demolition” means any act that destroys, removes, or relocates, in whole or part, a significant historic resource such that its historic, cultural, or architectural character and significance is lost. This definition applies directly to local land use decisions regarding a National Register Resource. This definition applies directly to other local land use decisions regarding a historic resource unless the local comprehensive plan or land use regulations contain a different definition.”* Note that in some cases the Goal 5 Rules apply although HRR does not, e.g. when a full program of historic resource review has not yet been applied to a newly-listed National Register district or property.
- 4. Subpart C.1.b. The street-facing exterior wall (facade) should not be replaced.** Any addition should be set back at least 15 feet from the facade. The 50% constraint should be applicable to the side and rear exterior walls. *Reason: preserving the facade is critical for historic resources.*

5. **Subpart C.3 and 4. It should be clear that the size and scale of converted historic resources must be approved by HRR when applicable; Table 405-2 may not supersede HRR.** *Reason: The size and scale allowable by HRR may or may not comply with Table 405-2. In areas with existing large houses, FAR in excess of Table 405-2 limits may be appropriate. In other areas, compatibility requirements may dictate FAR less than Table 405-2 limits. Subpart C.3 should apply only when HRR does not, e.g. to HRI ranked properties or to Local or Historic Conservation Landmarks which are being processed through Community Design Standards.*
6. **Subpart C.5. Visitability requirements should not apply to dwelling units contained within the original structure, or to an ADU added above a garage.** *Reason: consistency with 33.405.060.C.3. It may often be impracticable to create visitable dwelling units internal to an existing structure (e.g. internal ADU or internal duplex/triplex conversion). If dwelling units are created via addition or detached ground-level ADU, visitability is a reasonable requirement.*
7. **Subpart C.6: No additional off-street parking is required, but the existing number of off-street parking spaces must be retained.** *Reason: consistency with 33.445.610. Also, given the proposed change to C.1.b and the existing ADU rules which prohibit front-yard ADUs, there will be no good reason to remove driveways from the street to a point 15 feet behind the facade.*
8. **FINALLY:** among the group of PCHR members, many of whom are very familiar with applicable code, there was uncertainty about the intended effect of 33.405.070 and its interaction or conflict with existing code and Goal 5 Rules. **We invite BPS staff working on this section of the Residential Infill Project code drafting to meet with PCHR for further discussion and clarification.**



November 29, 2017

City of Portland Bureau of Planning and Sustainability  
Attn: Residential Infill Project  
1900 SW 4<sup>th</sup> Avenue, Suite 7100  
Portland, OR 97201

Re: Residential Infill Project Code Amendments

Dear Residential Infill Project Team,

On behalf of Restore Oregon, I want to thank you for all of the time and effort you have put into these proposed revisions to the Portland Zoning Code, known as the Residential Infill Project. These amendments represent a marked improvement over the previous proposal.

As you are aware, Restore Oregon's interest in this matter comes from its desire to not only encourage the preservation and restoration of designated historic resources by encouraging compatible infill, but also incentivizing the retention of existing older homes in general, including residences that could qualify for future historic designation. The benefits that would flow from increased retention of both historic and just-plain-good-old-houses goes far beyond the significant contribution these resources make to the character and livability of Portland's neighborhoods. Incentivizing preservation of our existing housing stock provides a supply of affordable housing units, which are lost once demolition occurs, thereby slowing the rate of gentrification while also avoiding a significant contribution to climate change.

**Restore Oregon supports code amendments that increase density within designated historic buildings and districts, so long as that additional density is compatible and does not compromise historic significance.** This can be accomplished in numerous ways, including incentivizing internal conversion of existing residences and construction of appropriately scaled and designed accessory dwelling units. Restore Oregon appreciates a number of specific provisions within the proposed draft that will further ensure compatibility, including:

- Making it clear that additional density within designated historic and conservation districts must comply with design review standards and guidelines that will ensure that existing resources are not negatively affected by additional density.
- Prohibiting alterations to designated historic resources that add additional stories, significantly elevate the home, or add an area that exceeds 100 percent of the existing foundation footprint.
- Providing for additional flexibility with the allowable site area coverage (FAR) that can be applied to detached ADUs that will help to encourage the preservation of existing homes.

That said, Portland is still suffering from a "demolition crisis" and the City has thus far been unwilling to embrace any meaningful demolition deterrents. The draft plan notes as much pointing out that replacement homes are "more expensive." In fact, in the City's recently adopted Comprehensive Plan contains numerous policies requiring that the City encourage preservation of the existing housing stock. For example, Policy 4.17 requires that the City:

Encourage alternatives to the demolition of sound housing, such as rehabilitation and adaptive reuse, especially affordable housing, and when new development would provide no additional housing opportunities beyond replacement.

Further, Policy 4.27 requires that the City take steps to protect the resources that contribute to a sense of place:

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Protect and enhance defining places and features of centers and corridors, including landmarks, natural features, and historic and cultural resources, through application of zoning, incentive programs and regulatory tools.

These obligations should not be compromised by the desire to accommodate greater density within close-in neighborhoods. Instead, the desire for greater housing choice should be pursued only insofar as it does not compromise these objectives.

The current RIP draft does include incentives that encourage preservation and encourage additional density when demolition occurs. That said, **the draft proposal fails to provide any analysis of what package of incentives would be necessary to achieve those goals.** For example, duplexes and triplexes are allowed additional FAR allocation but it is not clear whether this amount of FAR is actually the appropriate incentive.

Similarly, it is not at all clear whether waived parking requirements, allowing for a smaller lot threshold and additional housing arrangement flexibility, will be sufficient to dis-incentivize demolition. Given the dearth of analysis on this point, it is impossible for anyone to predict whether it will work.

Notwithstanding this overarching concern, **Restore Oregon has identified a short list of additional incentives that would prioritize housing retention over replacement:**

- Alter the City's SDC waiver program, subject to renewal in July 2018, so as to grant SDC waivers only in cases where the existing home is retained and provide additional SDC waivers for additional ADUs on lots where houses are retained. Providing such a waiver is critical to assisting existing homeowners to stay in their homes.
- Provide greater opportunities for ADUs so long as those additional ADUs are located entirely within the existing building envelope. For example, allow one additional internal ADU, in addition to the two detached ADUs permitted through the preservation path.
- Include basement floor area within the FAR calculation in cases where a tuck-under garage is visible from street. This revision is necessary because tuck under garages increase the overall bulk of the building and as a result, undermine overall design compatibility.
- Increase the design standards that apply to new duplexes and triplexes, including requiring that porch elevations match or are within one foot of the porch elevation of adjacent homes. Again, this amendment would foster greater design compatibility.
- Eliminate the ADU spacing standards to allow detached ADUs to be attached to an existing structure in cases where the existing home is retained.
- Provide an additional incentive for owners who agree to consent to designate qualifying historic structures or agree to waive the right to object to a historic designation for a period of no less than 10 years after taking advantage of the incentives provided by the preservation path. This waiver should be recorded against the property.

Again, Restore Oregon supports the idea of providing greater housing choices within the City and believes that historic resources can continue to contribute mightily to this effort. We look forward to further refining our concerns as this process moves forward. Thank you for giving us the opportunity to comment on this proposal.

Yours Truly,



Peggy Moretti  
Executive Director

City of Portland Bureau of Planning and Sustainability  
Attn: Residential Infill Project  
1900 SW 4th Avenue, Suite 7100  
Portland, OR 97201

November 30, 2017

To the Portland Bureau of Planning and Sustainability:

United Neighborhoods for Reform (UNR) was founded as a grassroots neighborhoods organization almost four years ago in response to deep concern about the demolitions of viable, relatively affordable homes and replacement with very large, very expensive houses.

We quickly realized that many neighborhoods were expressing concern about home demolitions and their associated health hazards and environmental effects, and replacements with large expensive houses. This was a citywide issue. In 2014 UNR held four open Demolition/Development Summits, attended by hundreds of people from across the city, to gather input about the concerns of all neighborhoods. The process culminated in the “UNR Resolution,” which was endorsed by 43 neighborhood associations. The Resolution can be viewed at <http://unitedneighborhoodsforreform.blogspot.com/2014/11/now-is-time.html>

UNR has been active in many ways to forward the goals of our resolution. UNR was instrumental in the passage of House Bill 871 in the state legislature in 2017, and is currently part of the state’s best practices implementation team to prevent the spread of hazardous materials caused by demolitions. UNR was also invited to be part of the city’s Deconstruction Advisory Group (DAG). In 2017 UNR was involved in opposing House Bill 2007. Finally, and most relevant to the Residential Infill Project (RIP), BPS asked UNR to provide an official representative to the Residential Infill Project Stakeholder Advisory Committee.

The UNR Steering Committee has spent many hours reviewing the October 3, 2017 Residential Infill Project Discussion Draft. We have also reached out to members of the Portland-area architectural community to better understand the technical points of the code. We attended the drop-in meetings held by BPS with coalition offices and neighborhood groups. UNR was also invited to attend several neighborhood association meetings to discuss their concerns about the RIP process.

UNR has serious concerns about the overall direction that the RIP has taken. The proposal to radically rezone most of the east side is risky and will likely result in more demolitions of relatively affordable houses, and, unless there are significant limits on the size of new houses, cause a spike in home prices. The lack of any significant analyses of the potential effects of the proposals on prices, infrastructure, and traffic is irresponsible on the part of the city. However, from our discussions with BPS staff, we are aware that BPS is focusing only on very specific comments on the draft proposals at this time. For now, as requested by BPS staff, we are focusing the majority of our comments on the specific draft code. Those comments are outlined below the signature line in our letter. We intend to comment on the broader issues of the RIP to the Planning and Sustainability Commission and City Council in 2018.

We would be happy to follow up with BPS on any of these points. Thank you for considering our comments.

Respectfully,

Barbara Strunk, For United Neighborhoods for Reform Steering Committee

## SCALE OF HOUSES

### General Proposals UNR **SUPPORTS:**

- 1) Using FAR as a measure of house size.
- 2) Decreasing allowable FAR of the main structure in all single-family residential zones.
- 3) Increasing front setbacks.
- 4) Limiting the number of stairs to the front entrance.
- 5) Requiring new buildings to be more accessible.
- 6) Measuring height from the lowest grade near the house.
- 7) Allowing internal conversions of existing homes for long-term rentals or sale.
- 8) Articulation of large street-facing facades.
- 9) New dormer requirements.

### General Proposals **UNR Does NOT Support:**

- 1) Excluding basements from the FAR limits.
- 2) Relying on ADUs to add opportunities for long-term renters/buyers with less money without conducting analysis to support this reasoning.
- 3) Allowing reduced front setback to 10 feet to match adjacent house, but not allowing increased setback to match adjacent houses.
- 4) Higher FAR on small lots.

### UNR **SUGGESTIONS to Improve the RIP Draft:**

- 1) Include basements in total FAR for the house, unless the first floor is no higher than 2 feet above the lowest point for measuring house height.
- 2) Create a mechanism to ensure that ADUs and internal conversions are used for long-term rentals or sales, and used for short-term rentals only for a limited time.
- 3) Lot coverage should be tied to lot size: FAR should be 0.5 for all lot sizes.
- 4) Reduce the house height limit on lots 5,000sf or less to 25 feet.
- 5) Allow houses to be up to 30 feet high if at least 50% of houses within 300 feet are taller than 25 feet.
- 6) For gable roof houses, measure the height to roof ridge if gables are more than 50% of roof area.
- 7) Main entry can be no higher than 6 steps above the lowest grade five feet from the house.
- 8) Match the front setback to adjacent houses, even if greater than 15 feet.
- 9) Require the retention of the original primary structure, including the front setback and entry façade, during the creation of an internal ADU or internal conversion.
- 10) Do not allow artificially raising the low point of the street facing property front with a retaining wall.
- 11) Grade must not be artificially built up to alter the reference point for measuring height.

## HOUSING OPPORTUNITY

### General Proposals **UNR SUPPORTS:**

- 1) Required visitability features for one unit: a low-or no-step entry, wider halls and doors, and living space and bathroom on ground floor.
- 2) If a bonus unit is allowed, all units must be permanently affordable.

### General Proposals **UNR Does NOT Support:**

- 1) The use of an “Additional Housing Opportunity” overlay zone over such a wide area of the east side.
- 2) The imposition of an “Additional Housing Opportunity” overlay zone this large without adequate analysis to predict effects on the city, including home prices and rents, displacement, and demolitions.
- 3) Allowing duplexes with added ADUs and triplexes anywhere in the R5 housing opportunity zone.

### UNR’s **SUGGESTIONS to Improve the RIP Draft:**

- 1) Before proceeding with the RIP, thorough analysis must be done of potential impacts on the city: housing prices, rental costs, infrastructure, number and distributions of demolitions, displacement, percentages of current viable houses, and more.
- 2) A pilot study of a small area of the city must be done first to test the impacts of the overlay zone on demolitions, affordability, and displacement.
- 3) Additional alternative map options must be developed for the overlay zone, as directed by the City Council in December 2016.
- 4) Use walking distance from frequent bus service (15-min. frequency, 7 days/week) to determine the overlay area, not a widespread one-size-fits-all area.
- 5) For lots of 7,000sf to 10,000sf, allow a bonus ADU, but only if the lot is within 500 ft. of existing public transit stops with 15-minute frequency, seven days a week.
- 6) If an existing house is preserved on a 7,000-10,000sf lot, there should be no limit to the numbers of units if the total FAR is limited and all setbacks are met.
- 7) Viable houses must not be demolished. Code must define viability clearly and the Bureau of Development Services must enforce this.
- 8) Develop more clear, specific, and realistic definitions of “demolition” and “major remodel.”
- 9) Develop and carry out strategies for building more complete neighborhoods in outer East Portland.

## NARROW LOTS

### General Proposals **UNR SUPPORTS:**

- 1) Require at least 2 units when new development is proposed on a 5000sf lot or larger in a current R2.5 zone.

- 2) On a lot adjacent to an improved and maintained alley, require access from the alley when parking is proposed.
- 3) Require attached houses on lots of 25 feet wide or less.
- 4) Allow property lines to be adjusted to create small flag lots when a house is retained.
- 5) Houses on flag lots must be restricted to 1000sf, and height to 20 feet.

**General Proposals UNR Does NOT Support:**

- 1) Rezoning current areas of R5 with underlying historic lot lines to R2.5. This contravenes the intent of the December 2016 City Council vote to prohibit lot divisions in R5 with underlying historic lot lines.
- 2) Height of 35 feet allowed on attached houses in R2.5 zones.

**UNR's SUGGESTIONS to Improve the RIP Draft:**

- 1) Do not upzone R5 areas to R2.5 against the City Council's recommendation.
- 2) Lower the height limit in R2.5 zones to 25 feet for single and attached houses.

## **CLUSTER HOUSING**

**General Proposals UNR SUPPORTS:**

- 1) The idea of cluster housing should be explored.

**General Proposals UNR Does NOT Support:**

- 1) It appears that there will be no guidelines in code regarding FAR, number of units, lot size.
- 2) Cluster housing is subject only to a Planned Development Review.

**UNR's SUGGESTIONS to Improve the RIP Draft:**

- 1) Specific code regarding FAR, height, number of units, building orientation to street and neighbors, open space, and lot size for cluster housing must be included in the RIP proposal.
- 2) Cluster housing projects must be considered in relationship to the neighborhood to avoid an apartment complex being placed in the midst of a single-family zone.



Date: November 30, 2017

From: Audubon Society of Portland

To: Tracy Morgan - Project Manager for the Residential Infill Project – City of Portland BPS

Re: Residential Infill Project Discussion Draft Comments

Dear Tracy Morgan,

Please accept these comments from the Audubon Society of Portland on the Residential Infill Project Discussion Draft "RIP".

We appreciate the amount of work that has gone into this RIP discussion draft; however, we are disappointed in the absence of measures to improve tree preservation and tree planting in this discussion draft, especially considering previous requests from the community and City Council to do so. Trees and other green infrastructure play a huge role in maintaining and improving the livability and health of our neighborhoods and increasing preservation of this infrastructure should be considered a priority in all City plans.

We understand the complexity of this project as it attempts to update the code to better meet the changing housing needs of current and future members, but feel that tree preservation is a glaring omission from the list of overlapping concerns considered in this discussion draft. In addition to the absence of suggested code adjustments to better preserve and place trees in our neighborhoods, the draft also includes proposals that will reduce the ability to protect existing trees.

We strongly urge staff to consider making these adjustments to the draft before it is forwarded to the Planning and Sustainability Commission. Suggested additions below are underlined, and deletions are ~~lined out~~.

A. Front setback:

The discussion draft currently proposed to increase the setback for new homes in certain residential zones. The adjustment could negatively affect existing trees in the rear or side yards, since it would be easier for a developer to obtain a tree removal permit that to secure an adjustment or variance from these new proposed setback requirements. The new code should instead give greater emphasis to on-site tree preservation than to front yard setbacks. Below are two proposed code changes that we suggest be included in the proposed draft.

*Option A1* - Retain the existing 10-foot front setback in R7, R5, and R2.5 zones. Do not increase the front setback 15 feet as proposed in the current discussion draft in Table 110-3.

*Option A2* – With or without acceptance of *Option A1*, above, add an additional exception to the required setbacks at 33.110.225 D. as follows to create more flexibility for onsite tree preservation:

D.5 Tree preservation. The front building and garage entrance setback may be reduced to zero if it would prevent a tree that is 12 inches in diameter or greater in the rear or side yards from being removed and prevent no more than 25% of the tree's root

protection zone from being disturbed, as required for preserved trees under Title 11, Figure 60-1. Where a side lot line is also a street lot line the side building and garage entrance setback may be reduced to zero. This allowance is automatic and does not require the developer to go through an adjustment/variance process.

B. Tree code (Title 11) exemptions for small residential lots:

The Title 11 tree preservation standards at 11.50.040 should be revised as follows to apply to more sites within the residential zone where the new residential infill standards will apply. This change would remove exemptions on tree preservation standards for small residential sites.

11.50.040. Tree Preservation Standards

A. Where these regulations apply.

1. Except when exempted by Subsection B., below, this Section applies to trees within the City of Portland and trees on sites within the County Urban Pocket Areas in the following situations:

a. On sites. Development activities with ground disturbance or a construction staging area greater than 100 square feet on unpaved portions of the site where there are Private Trees 12 or more inches in diameter and/or City Trees 6 or more inches in diameter and the site:

~~(1) is 5,000 square feet or larger in area; and~~

~~(2) has existing or proposed building coverage less than 85 percent.~~

Recently, several long-range planning processes have prioritized the increased preservation and planting of trees for both for human and environmental health; the Central City Plan 2035, Comprehensive Plan 2035, and Climate Action Plan. It is essential that the RIP proposed draft aligns with these long-range City plans and includes measures to increase tree preservation and plantings to improve the livability and health of our City.

Micah Meskel

Conservation Field Coordinator

Audubon Society of Portland

November 26th, 2017  
Bureau of Planning and Sustainability  
Re: Comment on Residential Infill Project Discussion Draft



**PROTECTING YOUR  
RIGHT TO ROAM**

Oregon Walks appreciates the opportunity to provide comments on Portland's Residential Infill Project. We are the state's pedestrian advocacy organization and we work to ensure that walking is safe, convenient and accessible for everyone.

We have some specific comments on elements of the RIP that directly affect the pedestrian environment. We support the design guidelines that limit the number of exterior, above-grade stairs that lead to the main entrance, as well as the requirement to divide large, street-facing facades into smaller planes. We also support the revised rules for parking and garages on narrow lots. We especially like the changes eliminating parking requirements, disallowing at-grade garages on houses less than 22 feet wide, and requiring parking, if provided, to be alley-facing if an alley is present. All of these changes will contribute to making a more pleasant pedestrian environment.

We also have general comments relative to the amount of infill supported by the RIP. Increasing housing options and density in all Portland neighborhoods will help make walking a good transportation option for a wider range of Portland's residents. Oregon Walks is in favor of the RIP's goal of increasing the supply of housing units in Portland's single-family residential areas; however, we would like the RIP to go further towards making that goal achievable.

Oregon Walks supports the limits on the scale of single-family homes. However, we are concerned that the FAR limits are too tight in the case of buildings with multiple units. The City should consider FAR bonuses for buildings that provide additional units, such as duplexes and triplexes.

We are concerned about a number of provisions in the RIP that restrict new housing opportunities. In order to encourage more infill, the City should consider the following changes. These are described in more detail in the comments to the RIP submitted by Portland for Everyone, of which Oregon Walks is a member.

- Allow the "housing opportunity" provisions in all areas of the city to improve equity outcomes and encourage the creation of additional walking scale neighborhoods.
- Make the affordable housing incentives workable to increase the likelihood that they will be utilized.
- Allow internal conversion of existing houses into multiple units in all areas, and provide additional incentives for housing preservation.
- Create a true cottage cluster code that will encourage the development of smaller, more affordable homes.
- Rezone all historically narrow lots from R5 to R2.5

Thank you for considering making these changes to the RIP, which will increase access to walkable neighborhoods for all Portlanders.

Sincerely,

A handwritten signature in black ink that reads "Claire Vlach".

Claire Vlach  
Oregon Walks Plans and Projects Committee



**DUPLEX BUILDOUT IN R-5**

***RECOMMENDATIONS***

A CRITIQUE OF THE RESIDENTIAL INFILL PROJECT

OCTOBER 17, 2016 REPORT TO COUNCIL

SUBMITTED BY "RIPSAC 7"

MEMBERS OF THE RESIDENTIAL INFILL STAKEHOLDERS ADVISORY COMMITTEE

DECEMBER 2, 2016

## COVER IMAGE

Modeling prepared by Sarah Cantine to illustrate the proposed RIP massing and scale of allowed duplex units in an R-5 zone.

## MEMBERS OF THE "RIPSAC 7"

Linda Bauer, Appointee - East Portland Action Plan

Sarah Cantine, Architect - Boise NA Land Use

Jim Gorter, Appointee - Southwest Neighborhoods, Inc.

Rod Merrick, Architect - Eastmoreland NA Land Use

Rick Michaelson, Appointee – Neighbors West/Northwest

Michael Molinaro, Architect, Appointee – Southeast Uplift

Barbara Strunk, Appointee – United Neighborhoods for Reform

## EXECUTIVE SUMMARY

**The Residential Infill Project Concept Report does not provide viable solutions to the problems it was intended to solve. The supporting analysis is fundamentally flawed. Implementation as proposed will result in great harm. Portland will be a less livable, sustainable, or affordable city.**

- The RIP deeply compromises 2035 Comprehensive Plan Goals and erodes the zoning code as a tool for shaping the city.
- The RIP is a far reaching entitlement to developers. Once in place it will be impossible to claw back.
- The RIP is not a recipe for affordability but a recipe for an investor owned, renter occupied city.
- The RIP encourages random dispersed density and increased auto dependency.
- The RIP fails to address charter issues of scale and problems with historic lot lines.
- The RIP encourages wasteful demolitions of smaller houses, displacement, neighborhood destabilization, reduced affordability, and loss of character.

**To advance the intent of the Residential Infill Project, Council should direct BPS to:**

1. **Address the housing scale in R7, R5 and R2.5 zones based on neighborhood characteristics.** This approach would protect neighborhood context and respect existing development patterns consistent with the 2035 Comprehensive Plan. It would protect existing more affordable houses. This was the one aspect widely advocated for by public comment and testimony. "One size does not fit all."
2. **Abolish recognition of historic underlying lot lines across the city** unless consistent with stated density standards approved in the Comprehensive Plan. Recognition of skinny lots has been a 20 year failed experiment to produce "affordable attractive housing". The resulting development pattern incentivizes demolitions, makes poor use of the land, adds little density, and removes affordable housing stock. Using lot lines to trump zoning is misguided planning.
3. **Address the appropriate placement of higher density housing around designated centers and corridors** where there is commercial and retail activity and frequent transit as called for in the Comprehensive Plan. Identify approaches that could make the financing and management of ADUs more feasible while retaining the original intent of "accessory" dwelling. Involve neighborhoods and local businesses in the process.
4. **Avoid the use of overlay zones as a bypass or override for the Comprehensive Plan** map and neighborhood and district planning. Consider the use of the "A" overlay as the basis for focusing middle housing.

The above are supported by the attached reports, analysis and testimony in the body of this report.

**This is a recommendation *not* to accept the report but to advance the 4 points described.**

**November 04, 2016**

Linda Bauer, Appointee - East Portland Action Plan  
Sarah Cantine, Architect - Boise NA Land Use  
Jim Gorter, Appointee - Southwest Neighborhoods, Inc.  
Rod Merrick, Architect - Eastmoreland NA Land Use  
Rick Michaelson, Appointee – Neighbors West/Northwest  
Michael Molinaro, Architect, Appointee – Southeast Uplift  
Barbara Strunk, Appointee – United Neighborhoods for Reform

We are representing a coherent and cohesive third of the RIPSAC appointees. Our shared perspective is to approach planning as neighborhoods, building around centers in ***neighborhood context*** consistent with supporting Goals in the 2035 Comprehensive Plan.

We have given many hundreds of hours both in the RIPSAC meetings and in meeting as a group to formulate our analysis and recommendations summarized in this analysis.

We all care deeply about our city and we applaud the effort to consider how and where to focus housing density and how to guide the growth of the city in a period of rapid growth. This was a promising start that ultimately ran entirely off the rails. **If the concern is affordability this project is a false promise. If the concern is a more walkable lively city, this is a false promise. If the concern is a reduction of house size this is a false promise, and finally if this is an attempt to reduce demolitions...well no, it is not.**

### **Subject: Comment on the October 2016 Residential Infill Project (RIP) Concept Report**

We focus first on the significant implications of the “Concept Report to Council”. Following this is a discussion of the **10 RIP Recommendations** and how they address the issues that frame **concerns underlying the project** but fails to address from speculative demolitions and housing costs to a zoning code that is misaligned with policies and goals in the Comprehensive Plan. We then look for common ground in the **three subject areas** that the RIPSAC was chartered to address along with an assessment of the results in those areas. In the summary, we highlight 10 recommendations and suggestions for advancing beyond this Report.

### **Significant Implications of the “Concept Report”**

- **The entire inner east side and part of the west side of Portland is to be rezoned by assigning a “housing opportunity zone” overlay designation that increases allowed density by 200 to 300%. The already compromised R5 zoning density designation with its substandard minimum lot sizes is retained in name only. The plan encourages triplexes on every corner, duplexes or a house with two accessory dwelling units on every 3,000 to 7,000 SF lot, and small cluster housing plus ADUs on every lot of 10,000 SF or greater. This is an unprecedented “entitlement” for developers. It is *not* justified by a shortage of land designated for higher density in the Comprehensive Plan but by the claim that innovative housing is desired in Portland. At the same time it is a taking from every stakeholder for whom zoning provides stability and predictability promised in the Comprehensive Plan.**

- Ownership standards are implicitly restructured from fee simple to a condominium basis since ADUs will no longer be “accessory” but able to be sold independently as will the duplexes, courtyard clusters, and corner tri-plexes that will be constrained to a single tax lot under the plan. Middle housing is primarily rental housing. Middle class resident owners will be displaced. Portland will transition to a city of investor-owners and renters.
- The density encouraged by this “overlay” is greater than that permitted in the multi-family R2 (2,000 SF per dwelling unit) zone further confusing the intent and integrity of the density designated code. The single family neighborhood zone, an essential characteristic of this city with one house per lot is effectively erased from most of Portland.
- By widely distributing density the proposal fails to focus density around centers consistent with the 2035 Comprehensive Plan. Neighborhoods that did not fit the ¼ mile bubble distance from corridors are declared “housing opportunity zones” in the name of “equity” without justification. The numerous skinny lots and lots with underlying lot lines less than 5,000 SF within this zone are defacto rezoned to R2.5. West side neighborhoods not within 1/4 mile of corridors and Portland’s west suburbs are not impacted presumably to diffuse opposition. The David Douglas school district is excluded while they develop a school expansion plan. Parking impacts are not addressed and transportation benefits are not analyzed. The false claim is made that this will produce more walkable neighborhoods
- The purported scale reduction is a clever gambit. The one size fits all approach allows structures greater than roughly 80% of the existing housing stock. Except for constraining the few very large houses and limiting the size of triplex and small lot units, little has been done to reduce the scale of buildings. Unpopular skinny houses are enshrined and allowed to grow higher. Nevertheless the home-builders, who vigorously supported the concept, are already asking for a larger envelope.
- The proposal entitles developers of new or remodeled multi-family structures on a *saleable area* of roughly 3875 square feet including the basement level plus a 15% density bonus in all impacted neighborhoods zoned R5. On a 7500 SF lot for example the saleable area increases up to 6200 SF. Additional height and area bonuses for converting existing homes to multi-family is proposed. The economic analysis (Appendix A) presumes that the *saleable area* of the structure is the FAR ration or 2500 SF for a 5000 SF lot.

Consequently the economic analysis may be characterized as flagrantly erroneous. Increasing the number of rental or condominium housing units on a site will certainly accelerate speculation, demolition and displacement in the most vulnerable neighborhoods and remove our most affordable housing stock.

- The “innovative” building types promoted by the plan are neither innovative nor apparently in high demand. All are currently allowed in the multi-family zones in the city of Portland. Very few developers have taken advantage of the available density entitlements. In fact most infill in the R2.5, R2, and R1 is built to a lower density than allowed. Three reasons might be that small scale condominiums are often problematic to finance, own, and manage.

Older houses divided into rental apartments are perhaps the most common examples of what the Report is calling “middle housing”. As an incentive to increase such existing house conversions a size and height bonus is recommended. Because fire, seismic, and acoustic privacy requirements make remodeling of existing housing is expensive, planning staff suggested that they will recommend changes to the Building Code to reduce requirements tailored to such conversion projects. This is unwise - except to protect historic resources.

- In character, the Report is a uniquely untested collection of hastily considered proposals that promote a density agenda, high-jacked by the housing availability crisis, marketed in the disguise of affordability, innovation, and compromise. The report contains an unprecedented radical redefinition of zoning that ignores most of the relevant goals and policies of the Comprehensive Plan.
- The RIP outreach process was non-responsive to the public comment process. Staff chose to portray a complex and confusing survey as the primary basis for claiming that there was wide support for the Project. The project statistician described it this way: “In total, 2,375 respondents answered *at least one* non-demographic question, and 610 completed every closed-ended question”. A survey completed by 600 people covering a wide spectrum of issues and a far less aggressive approach is presented as the basis for claiming a wide diversity of public support for the RIP. The overwhelming opposition in public meetings to the ¼ mile bubble from folks who took the time to attend meetings and the 32 Neighborhood Associations that provided thoughtful comment go unmentioned. Of these, 28 expressed strong opposition to widespread application of middle housing. Only 4 expressed support.

Within the 4 neighborhoods expressing support some or all of the Recommendations may be appropriate. If so they should be considered as test sites for the “overlay” for a period of 5 to 10 years to evaluate the implications of these unprecedented policies.

- The RIPSAC itself was overwhelmingly weighted with builders, their lobbyist, developers, and industry partners along with the “housing advocates” who appear to have initiated the “grand bargain” theory that they cribbed from a failed Seattle process. In the end staff described this group as the *majority perspective* when they agreed with the staff proposed policies.

### **The Proposals: How they address concerns that should have guided the Project**

We oppose one-size-fits-all zoning standards that we perceive as contradictory to goals in the adopted comprehensive plan and are not respectful of the variety of neighborhood characteristics that exist in the city, and which lead to simplistic and polarizing regulations. **Recommendations 1, 2, and 3** speak to improving scale, height, and setback standards they are little more than a distraction. And significantly they fail to recognize that *contextual standards* should be a guiding principle. Los Angeles and other cities are modeling a contextual approach. Portland is proposing a generic solution that encourages undifferentiated neighborhoods. **Not grand and no bargain.**

**We support the diversity of the neighborhood character.** This is a clear mandate in the 2035 Comprehensive Plan. District planning is needed to guide where and how additional density should be accommodated. The process should recognize that the condition of housing, scale, history, transportation, economic factors, and displacement considerations all play a significant role in defining what is appropriate. **All of the recommendations fail on the point and** instead recommend a uniform overlay that creates uncertainty for existing residents and owners and enormous opportunities for investors with no incentives to protect or enhance character.

**We support “truth in zoning”.** This is essential for rebuilding public understanding and confidence in the planning and zoning process and providing clear guidance for owners, designers, builders, and for the land use review process. Considering the primary metric for the zoning code is *density*, we oppose the widespread and indiscriminate application of a density “overlay” proposed in **Recommendations 4 and 5 and 7 and 8** in the R5 and R7 zones. This only serves to confuse the public and to undermine the integrity and clarity of the code. Densities proposed for the now meaningless “R5-R7” zones would exceed those now allowed in the R2 zone and in some case the R1 zone.

**We oppose recognition of historic underlying lot lines** except where these align with the density standards within an appropriate zone designation. The result for *all* neighborhoods burdened with these has been destabilization, demolition, and speculation. **Recommendation 8 and 9** are the nails in the coffin. The introductory narrative poses the misleading statement that “State law requires cities to recognize these lots as discrete parcels”. Significantly, Oregon law does not require that parcel boundaries trump zoning. **Recommendation 8b** appears to support that fact. **Recommendation 8a** recommends that such narrow (and skinny) lots be recognized *everywhere* in the housing opportunity overlay and simultaneously **rezoned to R2.5!** Since almost all are within the “opportunity overlay” this uses historic lot lines to trump zoning. The present restraints to demolition of existing housing are removed.

The R2.5 designation confers significant density and size bonuses. Recommendation 9 a,b,c,d,e allows 3 floors, larger(.7) FAR multiplier, higher roof and requires at least two unit replacement housing. The authors are playing false on every count. Assurances made by the PSC in 2015 to fix the underlying lot phenomenon in zoning reform are voided.

**We support additional zoning density around Centers,** and *where appropriate* along Corridors as in the current and 2035 Comprehensive Plan, to reinforce the establishment of *new and existing* centers, walking scale neighborhoods, use of transit and reduced auto dependency. This is a successful model advocated during the past 40 years and is yet to be realized, either in Portland or in the Metro Region. Scattered site middle housing in **Recommendations 4, 5, 6, and 9** undermine this goal.

**We oppose scatter site density** that will be the result of rezoning the entire eastside as a “housing opportunity zone overlay.” **Recommendations 4, 8, and 9 are diametrically opposed to the shaped density advocated in the Comprehensive Plan.** The last minute Comp Plan amendment P45 set an overly ambitious bubble around ill-defined corridors. Scattered “middle housing” defeats comprehensive plan goals to focus density around currently underbuilt walking scale centers. Our data will show that widespread application of “middle

housing” zoning will accelerate land price increases in an already overheated market, decrease affordability, destabilize neighborhoods, cause loss of viable and more affordable housing, and increase demolition and displacement.

**We object to untested “speculative” zoning - zoning that has some presumed social good intended** but where zoning regulations are implemented without testing and modeling physical and economic impacts prior to implementing code changes. Too often these initiatives seem to be driven by interests whose primary concerns are for a particular niche of real estate development in contrast to the public interest. Earlier decisions to allow recognition of underlying lot lines, encourage skinny houses, and compromise lot sizes are prime examples. **Recommendations 4, 5, 6, 7, 8 and 9** are in this category and the “analysis” is fundamentally flawed. The illustrated examples are not modeled to the allowed envelope. The black box economic analysis in Appendix A begins by using the wrong numbers for “saleable area”.

**We object to unsubstantiated claims of creating “affordable” housing for everyone by Portland For Everyone. Recommendations 4 through 10** are being promoted as a “grand bargain” by housing advocates who have modeled their faith on a failed Seattle initiative (<http://www.seattletimes.com/seattle-news/politics/mayor-murray-withdraws-proposal-to-allow-more-density-in-single-family-zones/>) using the same slogan. There has been no analysis and no evidence that these proposals will result in affordable housing regardless of how it is defined. The economic analysis in Exhibit A is a flawed analysis based on false assumptions.

Higher density does not equate to less expensive housing. As long as there is strong demand for housing and it can be profitably built and sold, rezoning for increased density will cause the value of the land to increase, the demolitions to accelerate, and the housing prices to rise accordingly. We need examples of the densified city that is thereby made more affordable unless in a state of decay and depopulation.

Where is the example of a split lot where the one or two replacement houses (regardless of size) without public subsidy are less expensive than the house demolished? When is the cost per square foot for a smaller house less than for a larger house? Given the same quality the reverse is true. We must address housing affordability as a regional issue with care and urgency not an excuse to provide a handout of unwarranted entitlements and speculative profits at the cost of demolition, displacement, and livability.

### **Project Objectives, Points of Agreement and Results**

Considering the *three areas* included in the RIPSAC charge are there were areas where we found common ground and points of agreement with the staff proposal and fellow RIPSAC members but almost none in the Report to Council.

**Scale and Massing Issues:** There was a good deal of consensus about the need to address issues of size, height, setbacks, placement of garages, off-street parking, etc. One of our principle concerns and one clearly expressed in the Comprehensive Plan is “one size does not fit all”. Both the Staff Report and The Report to Council clearly fail to address the issue. The recommendations

simply recognize the size of most recent infill and codify that building envelope, height, and setback. Where do we agree? We support floor area ration (FAR) as an additional tool to regulate size, support adjusting the regulation of side lot bays and eaves (Recommendation 3b), and support reducing the impact of garages on skinny houses (Recommendation 10) as a half measure.

**Narrow and Skinny lots and Recognition of Underlying lots of record** (lot splitting): There is a good deal of disagreement here since the one-for-two house demolition infill and skinny garage housing has become a business model for some developers who have represented these as “affordable” housing and thus aligned themselves with housing advocates. At \$600,000 to \$700,000 in some neighborhoods they don’t contribute to most definitions of affordability.

These lot line policies have been applied indiscriminately across the city, are making a lot of adjacent neighbors very unhappy, have a heavy carbon and poor space use footprint, create an unattractive streetscape, and are not producing much additional or affordable housing. Market rate new housing is not affordable but is very profitable and is systematically removing more affordable housing. *We supported the initial staff recommendation that began to address Truth in Zoning by limiting the use of these underlying lot lines for splitting lots in the R5 zone.* But in the Report to Council these lots are being redefined as spot zoned R2.5 and that erases any point of agreement.

We do agree is that the underlying lots should be recognized where the lot division is consistent with the density standards in the zoning code. Otherwise *the experiment with complex and confusing code provisions encouraging this kind of wasteful demo-development should end.*

**Innovative housing Types:** As we explored these ideas it became increasingly clear that *the housing types discussed (except cottage clusters) were not so much innovative as not being built where the code allows.* Developers are not building to the density already generally allowed around centers and corridors. In preparing the Report to Council, staff commissioned a special study to see if carving up examples of existing housing into smaller apartments is feasible. Possible yes, and expensive. The current zoning around centers is appropriate and needs refinement not more scattered density across broad areas of the city. The cottage cluster proposal (Recommendation 6) appears to allow approximately five 1,000 SF units on a 10,000 SF lot plus basements. For some reason outside the “overlay” there would be 10 units allowed including the “ADU”s. This is the density of the R-1 zone with no off street parking and appears to be a hand out to niche developers.

*These proposals in the first and more constrained version received a widespread and justifiably hostile reaction from the public as a handout to developers and a formula for speculation, accelerated demolition, and neighborhood disruption and displacement.*

## Summary Recommendations

### Summary of recommendations in the context of the project goals include:

#### Scale and Massing Issues:

1. Create development typologies that fit neighborhood context and aspirations. (look for examples such as Nori Winter's work in other cities) *One size does not fit all.*
2. Ensure that scale of houses fits neighborhood context, protect solar access and privacy, and maintain individual and shared green spaces.
3. The code must be clear. Use commonly understood terms. Provide clear definitions of what is allowed in each zone. Restore "truth in zoning." Avoid inconsistent and confusing criteria such density when lot sizes or "overlays" governing dwelling unit counts, or unit size are the governing criteria.
4. Save viable existing housing. The most affordable housing is almost always housing that is already in place.

#### Narrow and Skinny lots and Recognition

5. Remove provisions that allow lots smaller than 4500 SF in the R5 zone. Allow historically platted narrow and skinny lots to be *confirmed only* in the R2.5 zone. **Recommendation 8b is a start.** *End the use of historic lines to trump zoning as advocated in Recommendation 8a.* This is not consistent with the Comprehensive Plan or a mandate of state law.

#### Innovative housing Types:

6. Direct density around centers, **consistent with the above commentary** and the Comprehensive Plan, to reinforce the establishment of centers, walking scale neighborhoods, use of transit and reduction of auto dependency.
7. For areas in the City intended for higher density, evaluate why the existing regulations not working well, adjust and proceed with rezoning for the higher density to reinforce centers and corridors where appropriate.
8. The dispersed density model recommended in the Report will destroy our best loved history and most admired assets. "Middle housing" is for transitional density between single family and higher density multi-family. There is no transition if middle housing is "everywhere" housing.
9. Authorize limited testing of middle housing ideas where the neighborhoods have expressed strong need and support for such an experiment and subsequent evaluation of the policy. Robust evaluation of the proposed policy impacts is necessary.
10. Test and model physical and economic impacts for significant changes to the zoning code prior to drafting and implementing such changes. *Testing includes implementing zone changes in neighborhoods that support the proposals and evaluating the impacts.*

## Summary of recommendations for advancing:

- The RIP Report should not be endorsed or accepted for implementation by Council. We have a shortage of housing not a shortage land or a shortage of areas zoned for housing. The RIP Report may be looking forward one-hundred years but the development entitlements proposed are in effect the day of approval - and once given very difficult to unwind.
- The process and many of the recommendations are inconsistent with the goals and policies of the Comprehensive Plan on many levels as discussed above. Instead of “grand bargains” the BPS needs to understand how the current R1, R2, and R2.5 zones could be improved to accommodate transitional or “middle housing” densities.
- The City needs implementation of the Comprehensive Plan in the form of a modern flexible and easy to understand regulations with a long term focus on district and neighborhood planning. Actively engage neighborhood and business associations to participate in decision-making during planning exercises and for major developments to improve understanding of context and needed design guidelines.
- The Recommendations are not aligned with the Mayor’s goals to reduce demolitions, meaningfully temper the scale of houses, or increase density and provide smaller scale housing around centers. Expect much more demolition, speculation, reduced affordability and increased auto dependency from diffuse density.
- The **unprecedented** use of the **Housing Opportunity Zone Overlay** is no substitute for planning but rather a bone thrown to speculators, niche developers and housing advocates without regard for the existing context or fabric of the city.

**We challenge ourselves and all Portlanders to think in terms of a vision for Portland and the region that builds on the structure of the good neighborhoods that we have and figure out how to encourage other cities in the region before we do irreparable harm to what we have with poorly conceived ad hoc policies represented by this Report.**

## Attachments:

- Recommended R5 Base Standard, Draft Prototype
- Illustrations of Housing Scale and Streetscape Issues, RIPSAC 7 Sarah Cantine and Council Testimony
- Commentary on Appendix E, Public Comment RIPSAC 7 Michael Molinaro
- Commentary on Appendix A, The Johnson economic analysis McCullough Research
- Commentary on Appendix A, The Johnson economic analysis Loren Lutzenhiser
- Introductory Council Testimony RIPSAC 7 Jim Gorter  
Council Testimony RIPSAC 7 Michael Molinaro  
Council Testimony RIPSAC 7 Barbara Strunk
- RIPSAC 7 Summary Remarks  
Rod Merrick

Regulatory Ingredient	Variable	Existing Standard R5	RIP	Recommended Base Standard	Comments
	context		staff		"base standard" is the default standard for the zone
<b>Lot and Density standards</b>		Mix of lot size, lot lines, density, location		Clear definition	
Site Density per Household		5000 SF	1600	5000 SF	Truth in Zoning
Site Density subdivision Factor		0.91 per lot	?	1.0	
Auxiliary DU Density Multiplier		2.0, (1 auxiliary unit)	3.0	2.0, (1 auxiliary unit)	Allow 2 living units under common title & tax lot. May not be sold as separate properties.
Site Density Corner lot Multiplier		2.0 with duplex	3.0	2.0, (1 auxiliary unit)	Exception by type III review process as in A overlay.
Lot size minimum		3000 (1600 corner)	n.c.	4500 SF	Exceptions- for environmental offsets, condemnations, & existing building permitted lots
Lot size maximum		8500 SF (new lots)	n.c.	8500 SF (new lots)	Exception for existing building permit approved lots.
Corner Lot minimum	V	1600 min	n.c.	4500 minimum	Exceptions by type III review process as in A overlay.
Lot Frontage Minimum		35/25 Feet		45 Feet	Front and Minimum widths are separate
<b>Floor Area Ratio</b>		Not currently used			
Site area x Multiplier	V	N/A	0.5	0.30 -.40	1500 SF -2000 SF above ground for 5000 SF lot
Replacement of existing viable structures, historic resources	V	N/A		Existing FAR plus 25%	To reduce demolitions, limited to existing FAR plus factor
Additions to existing houses	V	N/A	Y	Existing plus 50%	Maintain 75% of existing dwelling volume, limited to height standards, and FAR base standard
ADU adjustment		N/A	.15	0.10 FAR bonus	Above ground: 500 sf for 5000 SF lot, up to 800 SF
Basement adjustment		N/A	NIC	100% of Footprint	Basement area not included only if elevation of First Floor is no higher than 48" above grade...TBD
Attic adjustment		N/A	Y	0.0	Except for storage attic
<b>Building Site Coverage</b>	V	45%	n.c.	40%	Reduction more closely aligns with typical coverage
Detached ADU or garage in Rear yard bonus	V	N/A	n.c.	300 SF	Additional site coverage provides bonus over 40% base standard and incentive for rear yard garage.
Replacement of existing viable structures, historic resources	V	45%		limit	
<b>Roof Height</b>					
Measurement	V	30 feet	?	24 feet	Varies with lot width, up to 32 feet for lots >90 wide. (option: average of adjacent houses)
Measure From	V	High point	L.P.	Low point	Measured from existing predevelopment grade. For sloping sites, TBD.
Measure To		Height measured to average height of main roof	?	Height measured to average roof height	Dormers included in measurement when longer than 50% of the length of the wall below.
Single pitch limits	V	6/12	n.c.	TBD	
Pitch Limit	V	12/12	n.c.	TBD	

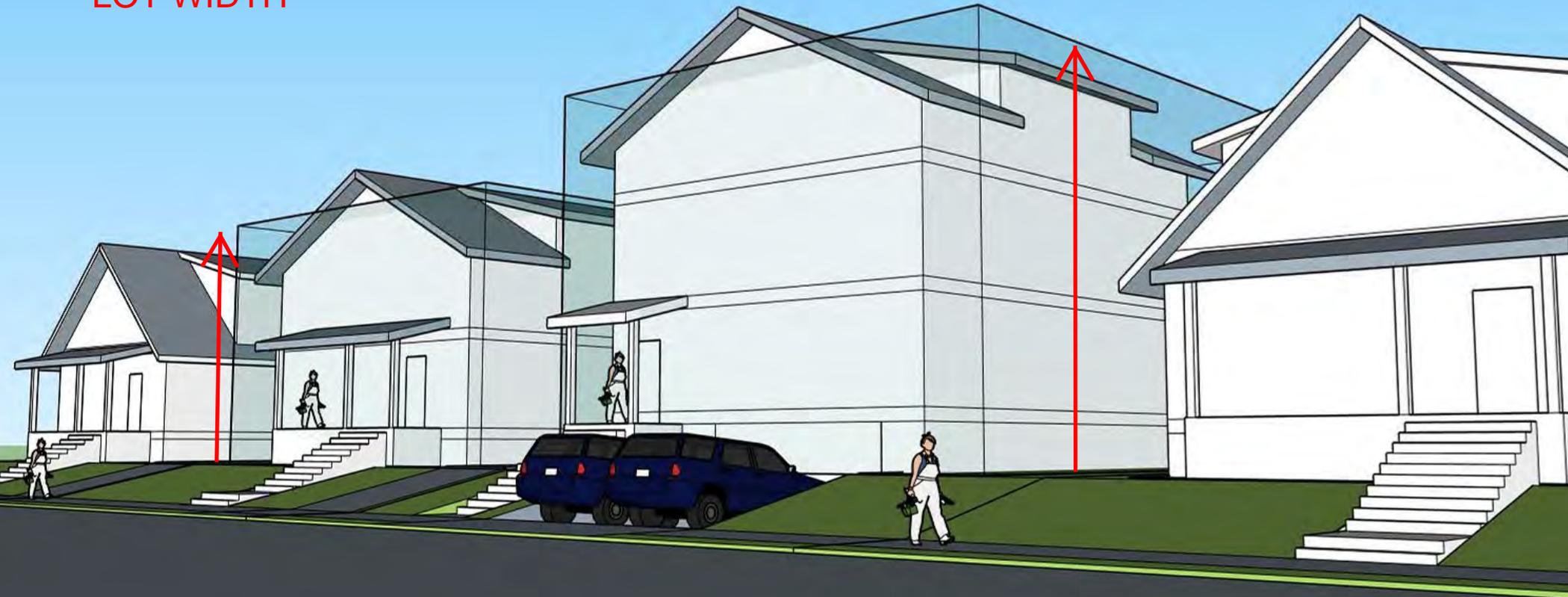
Regulatory Ingredient	Variable	Existing Standard R5	RIP	Recommended Base Standard	Comments
	context		staff		“base standard” is the default standard for the zone
<b>Set Back Dimensions</b>					
Front	✓	10	15	20 or match exist'g.	Match demolished house.
Rear	✓	5	n.c.	20	Detached ADU's 5', min 3 feet for 1 level ADU or garage.
Side	✓	5	Y	AVG 7.5 Increase for larger lots	Exception: Minimum 3' for bay or bump out and for one level ADU or garage with up to 10 high sidewall.
Corner	✓	5	?	10	
Zero Side	✓	Limited	n.c.	TBD	Allowed for common wall shared property line with Maintenance Agreement with neighbor
Zero Rear	✓	Limited	n.c.	TBD	Fire rated wall assembly. Limited height. Shared Maintenance Agreement with neighbor
Other side setback	✓	Adjoining MF or C		TBD	Non-articulated Sidewall > TBD

Regulatory Ingredient	Variable	Existing Standard R5	RIP	Recommended Base Standard	Comments
<b>Street Front standards</b>					
Main Entry Door Threshold Elevation	✓	48 inches CDS		48 inches	48 inches above grade measured from a point 96 inches toward the sidewalk from entry porch landing
Main Entry stair Pitch	✓	8/9 Building code		6" Rise, 12"Run	This provides safe exterior stairs for all users
Main Entry Covered Porch	✓	6 x 4??		6 x 4??	This provides a weather protected entry area
Main entry facing Street or porch	✓	Required		Required	This provides a visual connection between the street and entry.
Garage Wall Setback	✓	Align or Behind plane of main front wall		Align or Behind plane of main front wall	Anti-snout house regulation. Exceptions for steep slope. More stringent standard for some neighborhoods.
Attached Garage Width Maximum		40% Of street facing wall		12 feet wide above basement level within 30 of front property line	The intent is to encourage tuck under or side or rear yard garages.(currently allows 14' for 35 wide lot)
Garage Door Width less than 50 feet from front lot line	✓	N/A		9 feet maximum	No limit on rear yard, consider limit on corner side lot access.

Regulatory Ingredient	Variable	Existing Standard R5	RIP	Recommended Base Standard	Comments
<b>Site Design Standards</b>					
Allowable Driveway slope		PBOT		TBD	Allow steeper down and minimize upslope
Driveway width on property	√	40% of front yard		25% of front yard	Allows 12.5 wide for 50 foot lot
Required Front Yard Landscape	√	60% Front Yard		75%	Matches reduced driveway standards Review permeable area required in code.
Driveway width@ property line	√	20/25/30, 9 min, PBOT		18% of frontage max, 8' min	Allows 9' wide for 50 foot lot (18' for shared)
Shared Driveway width, front property line	√	As above, PBOT		12	Limits curb cut width
Driveway Curb Cut Frequency	√	PBOT		One per lot	
Required Off Street Parking		9 x18 Pad		9 x18 Pad	
Required Street Trees		One/30 LF		One/30 LF	
Undergrounding of OHW Service	√	N/A		For new construction	This reduces conflict with street trees and visual clutter
Sidewalk and Planting Zone		Mostly, PBOT		Required	Add to zoning code, This is owner responsibility
<b>Architectural Features</b>					
Roof Eave Setback Intrusion		20% of set back	3'	3' from property line	( or comply with Fire Code standards)
Window Proportions and trim	√	Community Design Standards			
Siding	√	Community Design Standards			
Cornice standards	√	Community Design Standards			

24' HEIGHT ON 50' WIDE  
LOT HEIGHT VARIED W/  
LOT WIDTH

30' STAFF RECOMMENDED  
HEIGHT CONSTRAINT



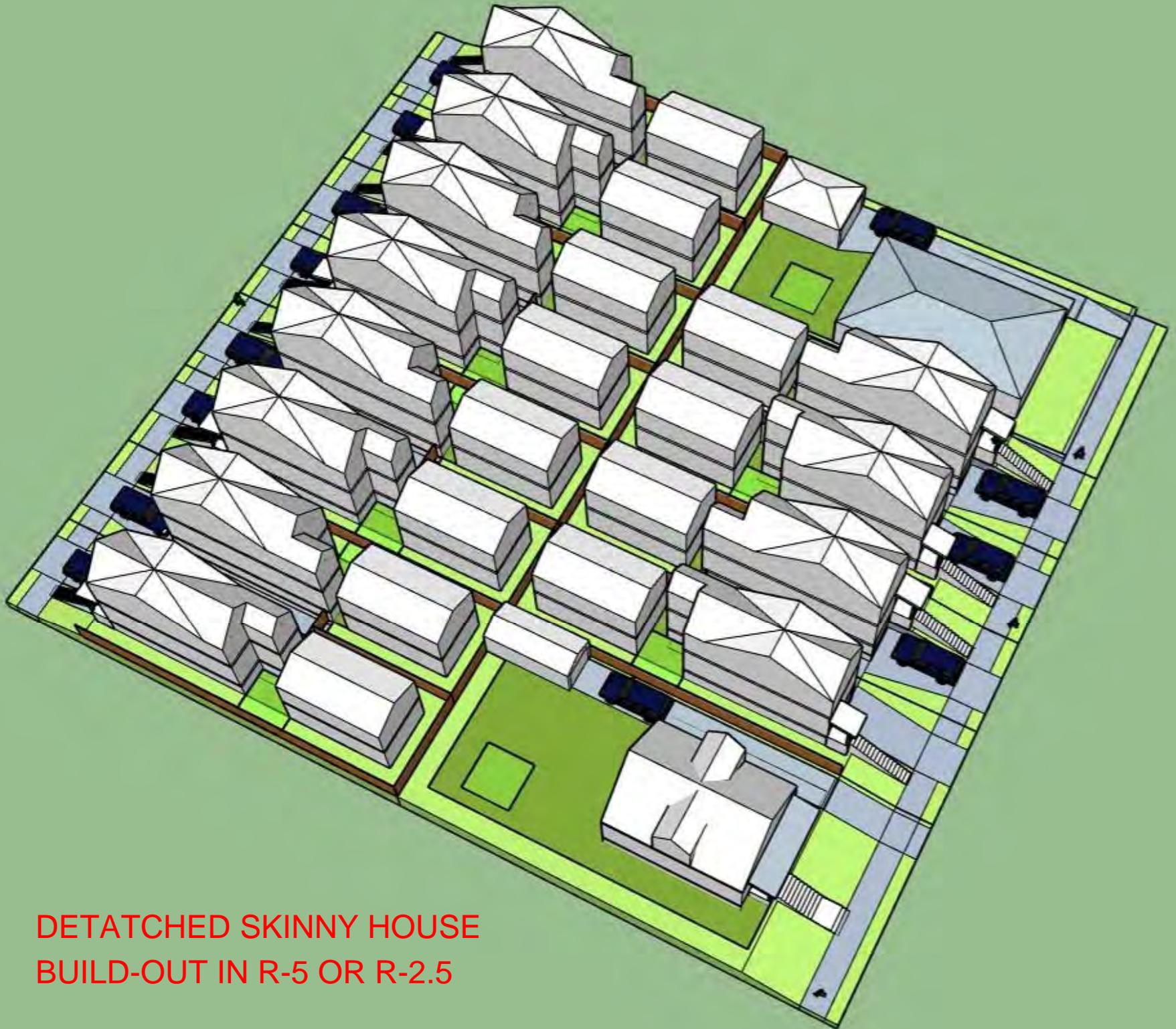
R-5 SINGLE FAMILY POSSIBLE BUILD-OUT



SINGLE DETACHED BUILD-OUT IN R-2.5



SKINNY HOUSE NEIGHBORS



DETACHED SKINNY HOUSE  
BUILD-OUT IN R-5 OR R-2.5

Testimony to Portland City Council 11/16/16

Sarah Cantine

I'm a member of the Residential Infill Project SAC, a Land Use Committee member of the Boise Neighborhood, a citizen affected by the proposal, and a licensed architect.

On behalf of the RIPSAC 7, I'd like to specifically address the aspect of scale. A chief concern and complaint has been the demolition of viable houses and replacement with oversized speculative housing. Hence, the City was tasked to define a building mass that would be acceptable for infill housing.

The planning proposal states the size of this oversized housing being built as being between 2,680 sf and 4,461 sf, and proposes the size be limited to 2,500 sf/5000s sf in an R5 zone and 1750 sf/2500 sf lot in R2.5. What is misleading is that this proposal excludes partial attics and basements in their calculation. If the main body of the house is 2 story, or 1,250sf/story, with both a basement and attic level, the overall size is actually closer to the size of the largest house built in 2013 of 4461 sf. (3.5+ floors x 1250 = 4375+ sf). With the 0.15 FAR increase bonus for detached ADU, the size easily exceeds the maximum. See attached.

While scaling down the mass that current code allows is a step in the right direction, the numbers don't bear out that it will change the arc of demolition, spec development, affordability or equity.



This subset of the SAC advocates a contextual approach to development that reacts in scale and mass to neighborhood context. Some context will limit the size of dwellings promoting smaller dwellings and keeping land costs relative to what a small house may yield. With smaller profit margins, additions and renovations become a more viable alternative, reducing demolitions (environmental contamination, waste, cultural loss), reducing displacement, preserving greenspace, and supporting more small local businesses.

The reverse also holds true. Neighborhoods with larger dwellings, or particularly those immediately adjacent to commercial development are limited to the same size structures as those remote to

commercial corridors. These are areas that should logically be the bridge between the mass of large scale development and neighborhood scale. These areas are optimal for middle housing especially. Context supports transitional massing and density is an anticipated aspect of the neighborhood edge to commercial.

Middle housing relies upon a walkable neighborhood, and is meant to inhabit the same scale structures as the rest of the neighborhood.

Missing Middle buildings typically have a footprint not larger than a large single-family home, making it easy to integrate them into existing neighborhoods, as well as serve as a way for the neighborhood to transition to higher-density and main street contexts.

—Opticos Design, Inc.



THIS IMAGE MAY ONLY BE USED WITH ACCOMPANYING ILLUSTRATION ATTRIBUTION TO OPTICOS DESIGN, INC.

Understanding and responding to **massing and adjacency context** is vital to the success of middle housing and is not successfully achieved by a one size fits all approach.

**We support the following Scale and Massing approaches:**

1. Create development typologies that fit neighborhood context and aspirations. (look for examples such as Nori Winter’s work in other cities) *One size does not fit all.*
2. Ensure that scale of houses fits neighborhood context, protect solar access and privacy, and maintain individual and shared green spaces.
3. The code must be clear. Use commonly understood terms. Provide clear definitions of what is allowed in each zone. Restore “truth in zoning.” Avoid inconsistent and confusing criteria such density when lot sizes or “overlays” governing dwelling unit counts, or unit size are the governing criteria.
4. Save viable existing housing. The most affordable housing is almost always housing that is already in place.

I encourage Council to review the proposals with an eye to context and strengthening the positive aspects of each neighborhood, and have a few thoughts on underutilized land in R2-2.5. I speak as a single resident in a 1400 sf house on 5000 sf of land in R2.5. The lack of affordability means that any move to downsize would financially be a lateral one with an increased commute, and would require me to leave my beloved neighborhood, thus removing any incentive. I see ADUs increasing in my neighborhood in a positive fashion as more private homeowners are able to share in the prosperity and remain in the neighborhood, while adding density in a layered way that creates the variety of housing we need. Many residents though lack an understanding of the process and the funds to develop. To encourage this form of actual infill I have the following proposal.

- 1.) Permanently waive SDC fees (they are finally starting to work) on ADUs for existing dwellings.
- 2.) As the PDC has a Storefront Improvement program, initiate a Neighborhood Infill Pathway Program. ('NIPP displacement in the bud.') This program would be dedicated to streamlining the process for private owners and smaller developers to add density either through additions and internal conversion of existing houses, or ADUs.
- 3.) Create designated BDS staff versed in the practical aspects of this development type for pre-application through Permit planning and zoning assistance.
- 4.) Incentivize reuse of existing structures in lieu of demolition, accessible units, affordable units (10 year renewable MULTI type to sliding % scale), energy efficiency, sustainable materials and tree preservation. The incentives could be in the form of tax abatement, height/density/FAR bonuses, or a combination of all.
- 5.) Encourage the development of predesigned and engineered replicable ADU types that can be easily permitted to streamline staff workload. Many architects have done ADUs and could assist in developing some basic models (re-used for a modest royalty) or be preapproved much like the FIR program is to contractors.
- 6.) Partner with the PDC to supply architectural support for ambitious or difficult design scenarios.
- 7.) Partner with lenders to support and streamline funding small scale development.
- 8.) Partner with non-profit housing groups, minority affiliations, churches, grant writers, philanthropic organizations, PDC, and other stakeholders to provide support and seed money for development.
- 9.) Partner or supply legal aid to avoid predatory lending or development schemes.
- 10.) Engage neighborhood associations to have involvement in supporting good developments and flagging those that would conflict with neighborhood context.

This would really empower neighborhoods, add to their diversity (rather than removing it through repetitive McMansions), generate increase tax revenue in stagnant areas, increase local small business employment, strengthen neighborhood cohesion/maintenance, and demonstrate the City's commitment to equity. This approach also fills all of the goals of the RIP.

On a personal note, I joined the RIPSAC because my neighborhood is distinctly affected by displacement and loss of community in the face of incredibly rapid growth and land value escalation. I had hoped this process would bring together people with different skill sets and perspectives and with knowledge of many different neighborhoods in order to generate ideas that would strengthen our neighborhoods and

urban building fabric, and give structure to affordable housing options. Instead it seemed a foregone conclusion that residential infill meant residential demolition and rebuild, and that we were there to provide feedback on what predetermined limitations and allowances to development would be acceptable to different interest groups. I say this with all due respect to the many fantastic planners involved, but this was not the productive work I had expected to do, and pitted very reasonable people against each other in the pursuit of a common goal. I am concerned that this proposal is one dimensional in favor of redevelopment, and does not provide my, and other vulnerable neighborhoods with the support they need to be affordable, equitable and sustainable.

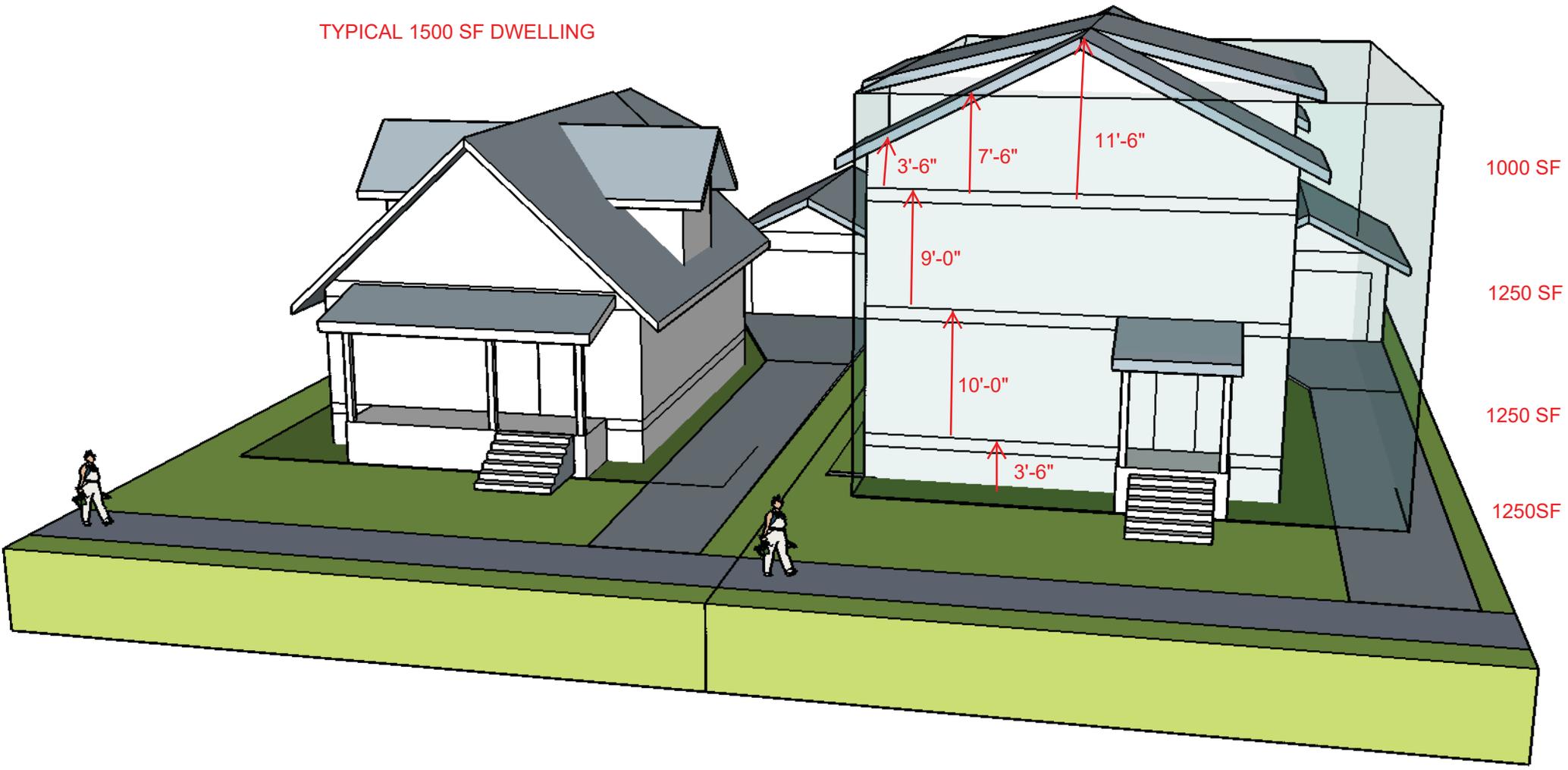
Thank you for your time,

Sarah Cantine

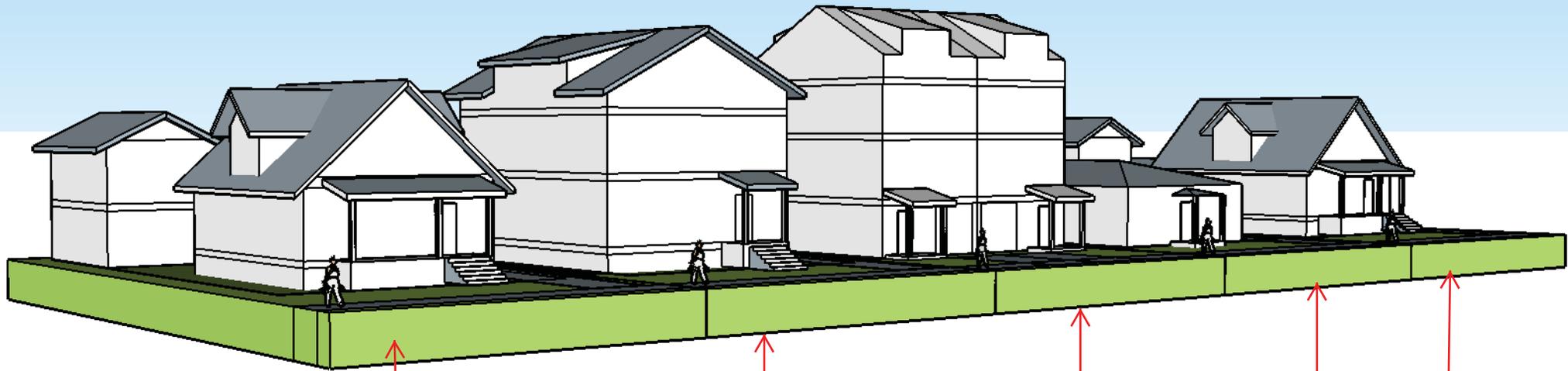


TYPICAL 1500 SF DWELLING

PROPOSED MAXIMUM DWELLING(S)



R5 DWELLING MASS  
 BOX AROUND DWELLING INDICATES ALLOWED HEIGHT AND LOT COVERAGE  
 4750 SF +/- PLUS 375 SF DETACHED ADU = +/- 5125 SF



TRADITIONAL 1500 SF DWELLING

MAX. NEW R5 DWELLING

MAX. NEW R2.5 ATTACHED DWELLINGS

TRADITIONAL 1500 SF DWELLING

November 14, 2016  
Residential Infill Project Testimony  
Michael Molinaro  
RIPSAC member  
4007 SE Taylor  
Portland, OR. 97214

The initial draft proposal of the Residential Infill project dated June 2016 received attention via open neighborhood meetings, surveys, and detailed review by many neighborhood associations. This Public comment period ran from June 15, 2016 to August 15, 2016.

The results of these comments were published in several appendixes to the initial report. The staff egregiously focused on only one of these comment vehicles, the questioner that garnered a mere 2,375 respondents.

In their summary on page 4 of the "2016 Public Comment Summary Report", "Public Engagement, By The Numbers," the comments by Portland Neighborhood Coalitions, and neighborhood associations were treated as a single response. With no weight given to the numbers of citizens represented in those responses.

Appendix E: letters from Organizations are duly published and, when read, display the extreme displeasure with the infill report.

This testimony was thoughtful and succinct. Of the 32 neighborhoods represented in this testimony, only 4 approved the Infill Report. 28 did not approve. The population which is represented in this disapproval exceeds 140,000 residents. Compare this to the mere 2,375 that opened the survey.

Staff exhaustively analyzed to survey results to wrongly present the "favorable" comments as the general feeling throughout Portland, completely ignoring these neighborhood comments.

Since this initial report is now superseded with the October 17, 2016 report, all this testimony, we have been told, is moot.

There is overwhelming written testimony rejecting this residential infill project that has been systemically ignored.

Attached is a neighborhood by neighborhood listing of testimony submitted. Those who rejected the infill report are highlighted in red, and those accepting the proposal are in green.

We urge the Commissioners to heed the call of the many participants who reject this project.

	10/29/2016	YES	NO
NEIGHBORHOODS SUBMITTING TESTIMONY ON RIP 9/16 PROPOSAL			
NEIGHBORHOOD ASSOCIATION	POPULATION	AREA	POP./ACRE
PREPARED BY MICHAEL MOLINARO, AIA SEUL REPRESENTATIVE TO RIP			
ARNOLD CREEK	3,125	718	4.4
ASHCREEK	5,719	757	7.6
BEAUMONT-WILSHIRE	5346	470	11.4
BRENTWOOD-DARLINGTON	12,994	1117	11.6
BRIDLEMILE	5,481	901	6.1
COLLINSVIEW	3,036	465	6.5
CRESTWOOD	1,047	221	4.7
CULLY	13,209	1971	6.7
EAST MORELAND	5,007	705	7.1
FAR SOUTHWEST	1,320	391	3.4
HAYHURST	5,382	730	7.4
HEALY HEIGHTS	187	35	5.3
HILLSDALE	7,540	1131	6.7
HOLLYWOOD	1,578	142	11.1
HOMESTEAD	2,009	569	3.5
IRVINGTON	8,501	551	15.4
MADISON SOUTH	7,130	1149	6.2
MAPLEWOOD	2,557	398	6.4
MARKHAM	2,248	288	7.8
MARSHALL PARK	1,248	366	3.4
MULTNOMAH	7,409	923	8
NORTH TABOR	5,163	371	13.9
RICHMOND	11,607	814	14.3
ROSE CITY PARK	8,982	748	12
ROSEWAY	6,323	535	11.8
SELLWOOD-MORELAND	11,621	1155	10.1
SOUTH PORTLAND	6,631	872	7.6
SOUTHWEST HILLS	8,389	1936	4.3
SUMNER	2,137	481	4.4
SUNDERLAND	718	1056	0.7
SUNNYSIDE	7,354	382	19.2
WEST PORTLAND PARK	3,921	472	8.3
TOTAL NEIGHBORHOODS REPRESENTED	32		
TOTAL POPULATION REPRESENTED IN TESTIMONY	174,919	26.8	OF TOTAL POP
YES TO RIP PROPOSAL	33,266	19.02%	
NO TO PROPOSAL	141,653	80.98%	

# McCULLOUGH RESEARCH

ROBERT F. MCCULLOUGH, JR.  
PRINCIPAL

Date: November 14, 2016  
To: Portland City Council  
From: Robert McCullough  
Subject: Review of “Economic Analysis of Proposed Changes to the Single Dwelling Zone Development Standard”

Last month, Portland’s Bureau of Planning and Sustainability distributed a short seven-page study by Johnson Economics with some surprising conclusions.<sup>1</sup> The study is challenging to read and understand, but the gist of the study is:

**Our analysis indicates that the proposed changes in entitlements would likely result in a lower rate of development and redevelopment in the study area, yielding less in terms of units and construction investment.** While the marginal impact would be low in percentage terms, a similar impact is expected in both the close-in as well as less urban areas. The modest increase in allowable units is more than offset by the lower allowed square footage of new development, which generally reduces the supportable land value for new development. The lower supportable land value decreases the likelihood of redevelopment on a significant number of parcels.

**Sites that do redevelop under the proposed modifications would be expected to deliver units at a generally lower price point and higher unit density.**<sup>2</sup>

To a real estate investor and/or an economist, this is a perplexing conclusion. As a general rule, placing limitations on the supply tends to raise prices and reduce quantity. A model that reduces prices and quantities simultaneously cannot be easily reconciled with market economics.

In the chart below, the supply curve is shifted left towards the origin. This reflects the RIPSAC proposal that will restrict allowable floor space in new construction.

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<sup>1</sup> Economic Analysis of Proposed Changes to the Single Dwelling Zone Development Standard, Jerry Johnson, October 17, 2016.

<sup>2</sup> Ibid., page 7. Emphasis supplied. Typographic errors have not been corrected from the original text.

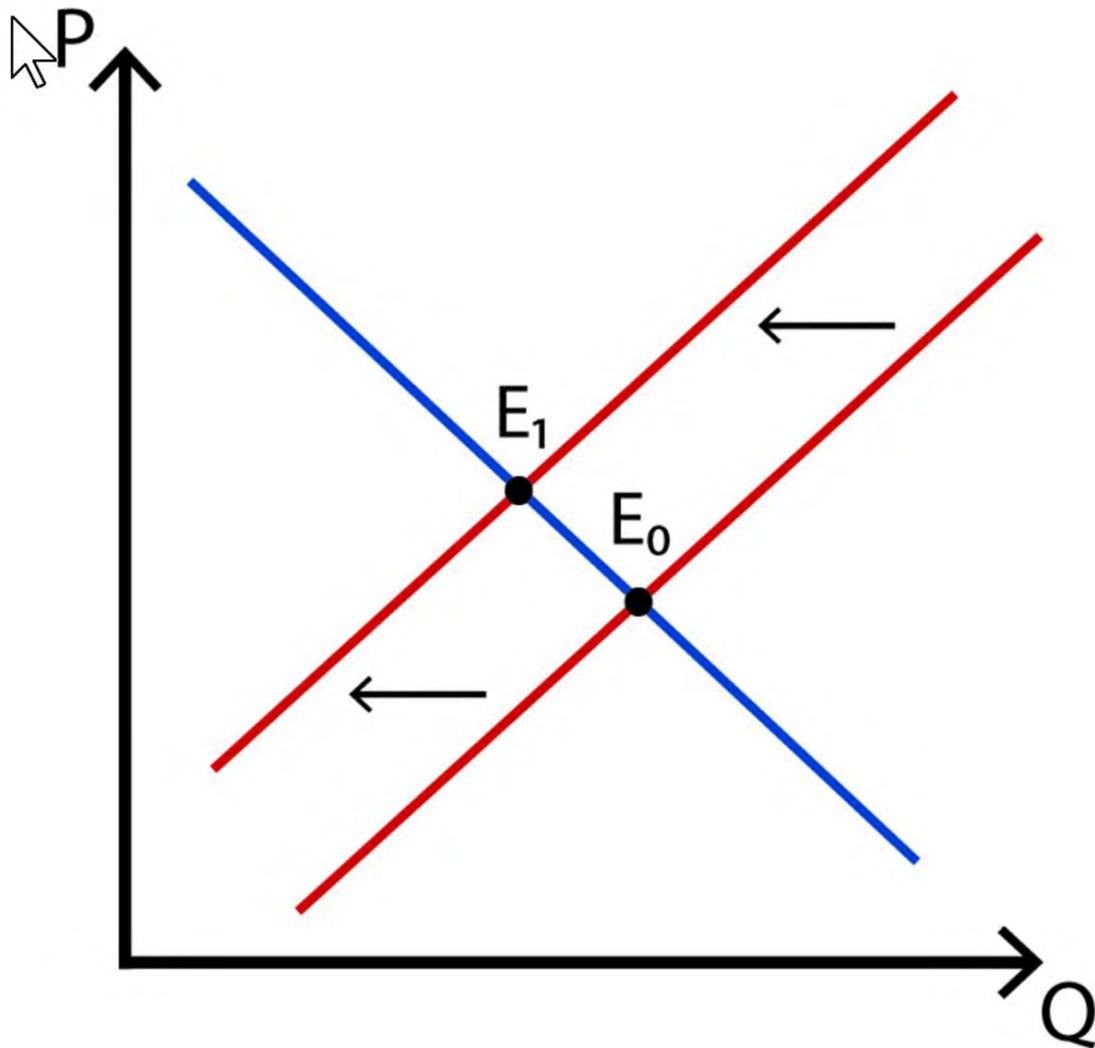
Review of “Economic Analysis of Proposed Changes to the Single Dwelling Zone Development Standard”

November 14, 2016

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As the supply curve contracts, the new equilibrium price is increased and the quantity supplied is decreased. This chart has been a staple of introductory economics courses since it was introduced in 1890 by Professor Alfred Marshall.



To understand how this study achieved such an unusual result requires a very careful reading of the seven-page report.

Such a reading identifies the following important issues with the report:

Review of “Economic Analysis of Proposed Changes to the Single Dwelling Zone Development Standard”

November 14, 2016

Page 3

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1. The report only considers rental units.<sup>3</sup>
2. The only RIPSAC variable considered was allowable square footage.<sup>4</sup>
3. The assumptions have some very surprising values. For example, the required rate of return on homes is 227% of the return required on rentals.<sup>5</sup>
4. The results are based on a simple profitability calculation that assumes the critical inputs and then derives a residual land value.<sup>6</sup>
5. The basic model is not well explained or documented.<sup>7</sup>
6. The model does not include market price changes.<sup>8</sup>
7. The table on page 2 has minor computational errors and is inconsistent with the similar table in the appendix.<sup>9</sup>

In general, this appears to have been prepared hastily and without a thorough review of the issues facing Portland.

First, the high required rate of return on homes will have had a significant impact on the rate of “redevelopment” – a term that would seem to be synonymous with demolition of existing homes.<sup>10</sup> The assumption that developers view homes as more than twice as risky as rentals is both pivotal and inexplicable. And, of course, the assumption that home construction is more risky will drive the result that demolitions will be reduced.

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<sup>3</sup> Ibid., page 2.

<sup>4</sup> Ibid., page 4.

<sup>5</sup> Ibid., page 2. The term used in the report is “Threshold Yield Rate” which is not defined in the report. It is defined in a previous report for the City of Eugene (October 29, 2008) as “Threshold Returns – The return on investment necessary to induce development can change quickly, and reflects broad financial trends as well as a more localized assessment of risk. Reducing the threshold returns necessary can significantly increase viability, while an increase in those same rates would decrease viability.”

<sup>6</sup> Ibid., page 5. Terminology in the report changes to “Residual Property Value” later in their report: “Residual Property Value reflects the maximum supportable acquisition value of the property under an assumed development program.”

<sup>7</sup> Ibid., page 5. The assumptions would appear to be large and are not documented in the report: “Key inputs in the “production” model are those that impact revenues, costs, return parameters and site entitlements. The production component of the model can be broken up into three primary categories that are determinative of final development form: achievable pricing, cost to develop, and threshold returns. The marginal impacts associated with proposed change in entitlements are incorporated into a broader modeling framework designed to translate shifts in these inputs into associated patterns of investment.”

<sup>8</sup> Ibid., pages 6 and 7. See the third title line in the results tables: “No Pricing Changes.”

<sup>9</sup> Ibid., pages 2 and page 9 in the appendix.

<sup>10</sup> Ibid., page 4. The report states “This would be reflected in generally lower residual land values associate with redevelopment options. The anticipated impact would be a lower rate of redevelopment, and at lower values.”

Review of “Economic Analysis of Proposed Changes to the Single Dwelling Zone Development Standard”

November 14, 2016

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Second, there seems to be no consideration of the reduction in affordable housing demolished in the course of “redevelopment.” Our review of recent demolitions in Eastmoreland indicates that replacement homes are 158% more expensive than the homes they replace.<sup>11</sup> There is nothing mysterious about the mathematics of demolition – older and smaller homes are the first selected for demolition, reducing the affordable strata of homes in older neighborhoods and reducing economic and ethnic diversity.

Third, the undocumented production model seemingly has no recognition of the dramatic change in demand for homes closer to the urban core. The shift in demand has been discussed extensively in the economic literature.<sup>12</sup> In Portland, our estimate of the premium for proximity to the urban core has increased from \$33,000/mile in 2011 to \$55,000/mile in 2016.<sup>13</sup>

In sum, it would appear that this hasty effort will have little if any relevance to the RIPSAC recommendations and should be given little weight in policy deliberations.

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<sup>11</sup> See “How inclusive is the current wave of demolitions?”, Robert McCullough, October 6, 2016.

<sup>12</sup> See, for example, “Local House Price Dynamics: New Indices and Stylized Facts”, Federal Housing Finance Agency, Alexander Bogin, William Doerner, and William Larson, June 2016.

<sup>13</sup> “Why are house prices so high in the Portland Metropolitan Area?”. Robert McCullough, September 5, 2016. The values have been adjusted for inflation and are in current dollars.

## **Testimony to the Portland City Council Public Hearing on Residential Infill Project Concept Report (11/6/6 w/ copy edit)**

Loren Lutzenhiser  
Professor Emeritus of Urban Studies & Planning  
Portland State University  
7010 SE 36th Avenue  
Portland, OR 97202

### **BACKGROUND**

The Residential Infill Project Stakeholder Advisory Committee (RIPSAC) has proposed a set of new zoning conditions that would be applied to most residential areas east of the Willamette River. The proposed changes would increase the number of housing units permitted per lot. The hoped-for development of “missing middle” small multi-family housing is intended to provide home owners and renters a new supply of affordable housing, while advancing goals to increase population density to accommodate continuing in-migration.

The RIPSAC was originally created to advise City Council about possible solutions to the problem of demolitions of smaller, older existing housing units and their replacement with larger new structures. The housing torn down was modest and much more affordable than the replacements. However, developers have frequently claimed that they were simply “providing density” to address city planning goals. The RIPSAC rezoning proposal before the Council does not address demolitions, but does create new regulations for replacement buildings, encouraging them to be multi-family duplexes and triplexes, with accessory dwelling units (ADUs).

When the RIPSAC proposal was made public, I was in the process of research on the carbon emissions related to demolition, construction and ongoing energy use in older vs. newer housing. It was relatively easy to expand the scope of that work to also consider the economics of demolition and construction of proposed duplex units with ADUs, taking a critical look at affordability and density benefits and costs.

### **RESEARCH QUESTIONS**

The purpose of the analysis was to objectively consider 3 key questions by examining publically available data.

These are:

- 1) “How affordable would envisioned housing be, and for whom, given current land, permit and construction costs?”
- 2) “How should we think analytically about ‘density benefits’ rather than simply assuming that more housing units naturally translate into larger housed populations?” “How much population density could be achieved via the rezoning strategy, and at what cost compared to other, non-demolition, alternatives?” and
- 3) “Are there possible unintended consequences of the RIPSAC rezoning in terms of community impacts?”

## ANALYSIS

I performed a number of analyses to attempt to address these questions, using information on market values for recently demolished houses, along with estimates of replacement housing costs (for envisioned duplexes and ADUs), in order to estimate a range of *necessary pricing* for the new units.

I then used U.S. Census data on Portland household incomes and annual housing expenses (e.g., mortgage payments, insurance, utilities, and taxes for home owners; rents and utilities for renters) to conduct an *affordability analysis*. I was able to compare Portland incomes with total housing costs for new duplexes and ADUs to determine how many households would find them affordable (by HUD definition of 30% or less of gross annual income for total housing costs).

I then examined the cost of building and leasing rental units, using current median rental rates, to see how many households would be able to afford the envisioned units as rentals. I also modeled the costs, rents and profits estimated for the extreme case of absentee investor development of triple skinny house units plus ADUs on lots with underlying 25' lot lines, as proposed in the RIPSAC rezoning. And I drew on social science scholarship on community and displacement to speculate about possible *impacts on neighborhoods* with lower versus higher demolition house values.

Finally, I considered density question by examining the current sizes of Portland households and the mismatch between more affordable demolished units that could be adapted for larger households, versus the newer units (both currently being built and envisioned) that are, in reality, often occupied by small households. As an added bonus, I included estimates of *carbon emissions* for a range of housing types, as well as aggregate costs of alternative public policies focused on “remodel and retrofit” versus “demolish and replace.”

## FINDINGS

Details of the data, assumptions, models, and analysis are not reported here, but can be shared. For present purposes, I will provide short summaries of my findings.

*The High-Level Findings are:*

- Given current costs and incomes, the RIPSAC rezoning will produce duplex housing that is affordable to a *surprisingly small fraction* of the population—those who have the highest incomes and the fewest current affordability problems. Over time, the size of this group will *continue to shrink*.
- ADUs show *potential* for affordability. However, 60% of the population with the lowest incomes and the greatest affordable housing needs would see no benefit.
- Rentals are *even less affordable* than owner-occupied duplexes and ADUs.
- Demographic realities mean that *density benefits are not significant* when compared to less costly non-demolition alternatives, particularly with currently permitted ADUs.
- There is an extreme overlooked scenario that combines absentee investor-owned 4-6 unit multiplexes on plots with underlying unused lot lines and R2.5 rezoning that poses a risk to the city of *self-inflicted policy damage* that would *accelerate gentrification* and *erode social capital and community*.

## ***Affordability***

Considers affordability issues and benefits for different envisioned housing types and forms of ownership.<sup>1</sup>

### *(1) Ownership of Duplexes*

- The envisioned duplexes are only affordable as an *ownership option* to the highest income 15-20% of the current renter population (incomes of \$75,000-\$85,000/year are required, depending on land costs and building qualities). As the cost of acquiring homes to demolish continues to increase, the income required to afford duplexes also increases—so a shrinking fraction of the population will be able to afford the units.
- U.S. Census data show that those Portland residents who are suffering most from rising rents and residential real estate prices are also those with the lowest incomes. They simply cannot afford the imagined new duplex units.
- These data also show that a very small fraction (1-2%) of households with incomes above \$75,000 have housing affordability problems.

### *(2) Ownership of ADUs*

- ADUs *do represent a more promising housing ownership alternative* that could be affordable for purchase by a household earning around \$22/hr. ADUs would be affordable for as much as 40% of the renter population (i.e., households with incomes of at least \$45,000/year; a higher-end ADU might require as much as \$65,000). However, there are also challenges to ADU ownership, and the required condominium model is not yet well developed in Portland.

### *(3) Duplexes and ADUs as Rentals are Profitable Under Limited Circumstances*

- At current high median *market rental rates* in Portland, the envisioned duplexes and associated ADUs could be developed as investment rental properties. A dispersed site, small duplex + ADU model could be profitable for investors under some circumstances. However, the analysis shows that profit potentials decline quickly as the cost increases to acquire houses to demolish.
- The building and operating of a duplex as a rental property is *not profitable* at current median rents if land costs are more than \$200,000 (very difficult to find in the Portland market). A duplex with an associated ADU can be modestly profitable when houses to be demolished cost \$300,000 or less—which is also a rapidly shrinking share of the residential real estate market. Most units even at that price point are located in areas with fewer services, amenities and employment opportunities.

### *(4) The Rental Model Provides Units that are Even Less Affordable than Ownership*

- The current market rents for duplex units would be about \$2,220/month and \$1,300/month for ADUs. These may seem to be reasonable amounts, given recent rapid rise in rents. However, at these prices the duplexes are affordable only to the highest income 15% of the renter population, and the ADUs to the highest income 35%. Because of the challenges to ADU ownership mentioned above, the higher-cost ADU renter-occupied option is probably the more likely short-term arrangement, with the noted shrinking of population for which the ADU is affordable.

### *(5) The Rental Model Involves Greater Income Transfer*

- Median market rents for these units represent a *housing cost that is at least 15-20% higher* than for *identical owner-occupied units (not factoring in the Federal interest mortgage tax deduction)*. Renters are paying the same expenses as they would if they were owners, *plus* investors' higher costs of borrowed capital, ROI on landlords' own investment, management costs, and profits. This rental model can "work" for investors (under the limited conditions described), but at the expense of higher housing costs for renters in units that are then affordable to an even smaller share of the population.
- The envisioned duplexes plus ADUs *as rental units* are, in fact, the *least affordable* housing option in the entire RIPSAC rezoning scheme. They would actually represent a new city-sponsored form of wealth transfer.

### **Density**

- Analysis finds that renovation of existing dwellings (rather than demolishing them), and adding ADUs to those and additional sites, would achieve the same density as demolition-with-duplex+ADU-replacement—at about 15% of the total cost to the households involved.
- Population density is related to numbers of housing units. However, there is not a one-to-one correlation. The wild card is household size. Additional units, even those designed for larger households, may end up being occupied by only 1-2 people. So it is *very tricky* to try to increase population density by simply increasing housing unit density.
- Portland *household sizes* are *very small* and have been trending in that direction for decades. Current demographics would shock someone who thinks that a two adult plus two-child household is at all typical. These are the Census estimates for 2015: one person 34%, two persons 33%, three persons 15%, four persons 12%, five or more persons 6%. *One and two person households* represent the *vast majority (67%) of the population*. Four or more person households of any sort (including stereotypical "nuclear" families and other forms, with and without children) represent less than 1/5<sup>th</sup> (18%) of the population. These are the demographic realities that any housing policy must face. And they mean that, no matter how many new units are provided, *the vast majority will be occupied by very small households*.
- This means that achieving higher densities is not a simple matter of adding more units. Each additional unit is most likely to house single persons and small groups *much more expensively* and much less efficiently than was the case in the 1950s and 1960s, when many of the dwellings being demolished now were built as "family homes," that accommodated then (and could again) larger households. City policy might fruitfully focus on enabling "right size" matching of those dwellings and family households.

### **Environmental Cost and Benefits**

- Although new construction is often claimed to be highly energy efficient (e.g., with various green certifications and modern code requirements), detailed building energy performance modeling finds that the consumption and CO2 emissions differences *are negligible* between a duplex plus ADU combination vs. a renovated existing building

with an ADU. The newly constructed buildings use only about 3% less energy than the “renovate + ADU” configuration.

- In assessing the environmental impacts from demolition and construction, we are dealing with less certain estimates (although we used the best available data bases and lifecycle carbon analysis software available). So it is the *comparison* of values and not *the absolute values* themselves that are important.
- Our demolition and new construction carbon emissions estimate is in the neighborhood of 47,000 pounds of CO2 emitted in the demo-construction process. The estimate for a major energy retrofit of an existing house is about 1,500 lbs (about 1/30th as much), and building a new ADU is estimated to produce around 12,000 pounds of CO2.

### ***A Very Concerning Scenario***

In cases of 75' wide lots with 25' underlying lot lines in a few parts of the city, absentee investors could conceivably build 3-unit attached skinny houses with at least one ADU through a series of permitted demolitions that could have *significant unintended consequences*.

#### *This Business Model Requires Predatory Land Acquisition and Low Construction Costs*

- To be optimally profitable, this business model requires maximizing the number of rental units on what had been a single-family home site. The RIPSAC report is ambiguous about whether the number of ADUs allowed on a 3-unit site would be one or three. If the latter, the unit density could go from one to six virtually overnight.
- The model also encourages predatory acquisition of 75' lots that have underlying lots of record. And it encourages the construction of the cheapest units possible units, with no design review anticipated in the rezoning proposal.

#### *Concentrating Wealth Transfer*

- The rental analysis showed that investor profitability requires high market rents and significant cash flows from renters to landlord investors, and at higher total housing costs than would be the case of owner-occupied units.
- The multi-plex/narrow lot pattern concentrates and amplifies those cash flows, making this option more financially attractive to investors (including absentee investors), without increasing the supply of affordable housing. If anything, it contributes to less affordability.
- From a density benefit standpoint, there may be an opportunity to shoehorn in 1-2 additional residents on a site. But at higher environmental costs and with other possible negative neighborhood impacts.

#### *City-sponsored Acceleration of Gentrification*

- There is a long and tragic history of urban renewal in Portland that has resulted in gentrification and displacement still occurring decades later. While “renewal” policies are always claimed to be “for the greater good” by their advocates, developers and civic

elites, we should take seriously the lessons from the city's gentrification and displacement past.

- Many neighborhoods where there are already real housing problems and somewhat lower property values, would be prime targets for one-lot multiplexes (with at least four units) if underlying lot lines trigger conversion of the area to R2.5 as proposed in the RIPSAC rezoning.
- It would take relatively few mini-rental-complexes of this sort, with occupants who have the higher incomes needed to pay the much higher rents, to begin to put pressure on neighborhoods. Successful investments could spur similar investments in this scenario. With rising surrounding property values, an acceleration of gentrification is quite imaginable.
- While many neighborhoods desperately need investment and development (particularly community development and employment development), the current residents would not benefit from this other sort of multiplex "development." To the contrary, gentrification and displacement could actually be accelerated by city-sponsored rezoning policies.

#### *Impacts on Social Capital and Community*

- Not just in lower income neighborhoods, but in many neighborhoods in Southeast and North Portland, this multiplex investment pattern could have negative effects on social capital and community not even considered in the seemingly benign "missing middle" imagery. When applied to neighborhoods with underlying skinny lot lines, policy-by-imagery without rigorous analysis can create unintended social and community impacts. For example, the underlying small lot plats are historical artifacts of a time when buyers wanted the flexibility to buy 50', 75' or 100' lots (virtually none have survived as 25' lots). These would be treated as R2.5 zones, described in the RIPSAC report as *"The R2.5 zone often functions as a transition between higher intensity zones (commercial or multi-dwelling) and lower intensity single-dwelling zones."* However, these lots are often nowhere near "higher density" areas. They occur in traditional single-family neighborhoods that are not close to neighborhood retail centers, corridors or good transit. The rezoning and requirements for multiplexes on redeveloped R2.5 lots, then, requires cars, parking, traffic, and a variety of other unconsidered knock-on effects in those neighborhoods.
- The renters who can afford these multiplex units may well be more transitory and spend less time in the neighborhood. There could certainly be many benefits to social capital of bringing in new residents with different values, new networks/connections and serving as different role models. However, if this is an investor-driven process (vs. community driven or city planning managed process), aggressive development of this housing style could result in rapid, uncontrollable neighborhood change.
- In neighborhoods with higher property values, triple skinny units plus with at least one ADU could be built through demolition of one (even a fairly expensive), single family home, creating multiple high rent properties quite rapidly—financed by absentee owners, using borrowed money and extracting future equity from renters' lease payments. Those landlords would have no stake in the neighborhood, would

communicate with their tenants through corporate property management companies, and would have little concern for the aesthetics or social impacts of their investment schemes. There would be no design review, so the cheapest possible three story, plain box 30'+ tall buildings with added ADUs could be shoe horned onto a site with no opportunity for protest. BPS would have no control. BDS would offer expedited approvals.

- Sadly, there would be little public benefit from this. But if this development pattern happened 3 or 4 times on a street and across 7 or 8 adjacent blocks over a few years, the impacts on the social fabric of neighborhoods could be substantial. Much more than neighborhood “character” is at stake. So too is the strength of supportive social networks of known neighbors who look out for each other, share histories and experiences, support one another, and sustain social bonds, networks and resilience.

### ***POSITIVE POLICY RECOMMENDATIONS***

The analyses reported above point to reasons to be concerned. But they also identify opportunities for policy innovation that can lead to positive and sustainable social, environmental and economic change.

#### *Encourage and Expand Support for ADUs*

- Although ADUs are as an affordable housing solution for only about 50% Portland households (35% if the rental option is the most likely in the short term), ADUs do represent a real, tested and proven *housing solution* with both affordability and density benefits.
- ADUs *do not require rezoning*. They are already permitted in all single-family residential zones. ADUs are also incentivized by renewed waivers of SDCs.
- ADUs represent an important form of housing for one and two person households, who otherwise might opt for larger existing or new houses. At their maximum permitted size of 800 square feet, ADUs are also completely suitable forms of housing for families (who often occupy apartments that size and smaller in outer ring suburbs).
- The proposed ADUs are *much more affordable* as an ownership option, which would be available to 50% of the renter population, with incomes around \$35,000/year. Challenges to ADU ownership have been noted and need to be squarely addressed by city bureaus and partners. If new policies are needed, they should be advanced.
- Some ADUs are being built. Many more are needed. There are likely problems to be addressed in order to more *rapidly increase* the numbers of ADUs. These include financing, landlord training/support/assistance, design and construction practices, lack of visible examples in many neighborhoods, and possible renter preferences. All of these could be fruitfully addressed by focusing the attention of city bureaus and affordable housing advocates on the problem of accelerating ADU construction.

#### *Renovate and Retrofit, Don't Demolish*

- More attention should be paid to the original mandate of the RIPSAC—assessing the harms of demolition and considering alternatives (not just changing the footprint and

number of housing units in a new structure). Analysis shows that renovation and energy retrofit is cost-effective, offers a good solution for housing more Portland residents and/or larger households, while providing environmental benefits that are as good or better than demolition and replacement.

- What would public policy look like that emphasized and facilitated renovation and retrofit? The conversation seems to be worth having now.
- There has long been considerable support for demolition and new construction because of the large profits and resource flows involved for developers, builders, investors, and city agencies. Renovation and retrofit solutions need comparable support from environmental actors, affordability advocates and Portland residents committed to sustainable solutions. Advocacy is needed for a better balance of community versus economic benefits and needs.

#### *Create Opportunities for Families to Own Renovated Homes*

- Policy could focus on how we can re-occupy homes and neighborhoods that used to shelter families and foster community. The multiple benefits of having families and children in neighborhoods—to schools, intergenerational community and voluntary institutions centered in neighborhoods—should be recognized and pursued in public policy. Demolitions, Mansions occupied by small adult households, and unplanned multiplexes do not offer positive policy pathways to realizing those benefits. It would be great if talented people like the RIPSAC members could focus energies and attention on a real “renewal” of Portland neighborhoods appropriate to the challenges we face.

#### *Focus Expertise on Comprehensive Housing/Zoning/Environmental Policy*

- The RIPSAC proposals represent a large-scale experiment in social engineering, intended to increase population density and affordability. There is little evidence that the rezoning or the new building forms envisioned would contribute very much to affordability or density. If the point of public policy is to create *actual solutions*, then social engineering is indeed called for. It would be useful, however, if actual social science knowledge about communities, urban change, policy impacts, and the effectiveness of different intervention approaches was brought to bear in working carefully and thoughtfully toward those solutions. At the end of the day, the RIPSAC process and proposals seem to be more aspirational than practical. Rezoning is a very blunt instrument and using it in these ways risks shortfall in hoped-for results, unintended costs and harms, continuing (at least not reduced) inequities, and a really short sighted “well, at least we tried something” response to serious—some would say *wicked*—but certainly not intractable problems.

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## **Data and Analytic Tools Used**

- Construction cost estimate databases and studies.
- Bureau of Development Services fee and system development charge (SDC) calculator and examples.
- Multnomah County Assessor tax records on property values for home demolished in 2013 and for new homes replacing them in 2014-15.
- Zillow.com home sales and rental price data for units within Portland city limits.
- U.S. Census of Population, public use micro data sample: Portland, OR.

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## **Acknowledgements**

I want to acknowledge my PSU colleagues who contributed to ongoing research that I was able to draw upon for this testimony. They include: Anthony Levenda, Aaron Ingle, Vivek Shandas, Amber Ayers, and Meg Merrick. Their expertise is outstanding. However, the conclusions and recommendations in this document are mine, and not necessarily theirs.

### APPENDIX TABLE 1

#### Portland Renter Incomes and % of Income Spent for Housing

Household Annual Income	Percent of Income Spent on Housing						Total
	A 10% and less	B 10-20%	C 20-30%	D 30-40%	E 40-50%	F More than 50%	
\$ 0-10K	2%	1%	4%	5%	4%	15%	5%
\$ 10-20k	4%	3%	8%	11%	25%	47%	16%
\$ 20-30k	3%	3%	9%	23%	31%	23%	14%
\$ 30-40k	5%	5%	16%	24%	17%	9%	13%
\$ 40-50k	2%	8%	17%	13%	12%	3%	10%
\$ 50-60k	4%	10%	12%	9%	5%	2%	8%
\$ 60-75k	7%	17%	13%	8%	5%	1%	10%
\$ 75-100k	10%	22%	11%	4%	1%	0.3%	10%
\$ 100-150k	23%	20%	7%	3%	0.2%		8%
\$ 150-200k	13%	7%	2%	0.4%			3%
\$ GT 200k	29%	5%	0.2%				3%
<i>Total</i>	<i>100%</i>	<i>100%</i>	<i>100%</i>	<i>100%</i>	<i>100%</i>	<i>100%</i>	<i>100%</i>

### APPENDIX TABLE 2

#### Portland Household Sizes (ACS 2014)

	Renter occupied:	Owner occupied:	Combined
1 person	52,317 45%	34,931 25%	87,248 34%
2 persons	36,250 31%	47,053 34%	83,303 33%
3 persons	12,807 11%	24,220 18%	37,027 15%
4 persons	9,060 8%	20,152 15%	29,212 12%
5 persons	4,272 4%	6,687 5%	10,959 4%
6+ persons	2,114 2%	3,957 3%	6,071 2%
Totals:	116,820 46%	137,000 54%	253,820 100%

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## NOTES ON METHODOLOGY AND CAVEATS ABOUT ANALYSIS AND CONCLUSIONS

The analysis reported here used data on land values from current real estate listings. Replacement building construction costs were obtained from building industry cost estimation software as well as published sources and recent builders surveys by the National Association of Home Builders. These estimates are, by their very nature, imprecise since they depend on costs for materials, labor, fixtures, finishes, and a range of construction “soft costs” that are proprietary information closely held by builders. Every effort was made, therefore, to use the most conservative estimates of construction costs. Permit fee costs and system development charges (the latter currently waived for ADUs and not used in ADU-related calculations) were estimated using the Bureau of Development Services cost calculator and published examples. Interest rates were obtained from published sources, and for commercial loans for rental construction from consultation with local lenders. Mortgage costs were calculated with standard spreadsheet functions (checked against online commercial estimators). Taxes were estimated from samples of actual new residential units in Assessor records and Portland Maps. Utility costs were estimated by reference to building energy simulation modeling performed for prior work. Median rents and rental rates per square foot were obtained from Zillow current reports. Income and household size information was obtained from the U.S. Census, American Community Survey for the area within the city limits of Portland for 2014 (the most recent sample available when the analysis was performed)

The purpose of the analysis was not to provide precise estimates, but values that could be compared (apples to apples) to realistically approximate economic and demographic realities using the best publically available information.

A number of factors that we could not measure or approximate with any confidence included some that might work to reduce estimates of ownership costs a bit (e.g., the Federal mortgage interest tax deduction) and would make the owner vs. renter cost differentials even larger than we reported (i.e., renter costs would be even higher in comparison). Other omitted factors work in the opposite direction—increasing the real world costs of new construction for both owner-occupied and rental unit cases. Again, we don’t know the precise magnitudes of these values. But taken together they mean that our estimates of total costs are clearly too low. These sorts of costs include: asbestos removal costs, demolition costs, site preparation costs, construction financing, and realtors’ fees. The costs of materials, fixtures and finishes have a dramatic effect on construction costs (30% of total for these costs according to the NAHB study). We assumed only minimum quality that is almost certainly exceeded in much new construction in the city. Also, we modeled the duplex units as single family homes in the given maximum volume allowed by the rezoning proposal (2500 sq ft above grade, with 15% density bonus if an ADU is included). Therefore, we did not estimate the additional cost (in the duplex case) of two kitchens, multiple baths, duplicated HVAC systems, wiring, plumbing or appliances. So we are confident that our total construction cost estimates used to compare costs to incomes are systematically *lower* than in the real world. This means that affordability estimates reported here are most likely very conservative. For example, if we estimate that 20% of the population might find option A, B or C affordable by HUD standards, in the real world that value might actually turn out to be 15% or even 10%.

For simplicity, we do not report results for modeling triplex owned or rented units. In the rental case, these smaller units would occupy the same volume in the building as would duplex units and would not change the profitability calculus of the investor. Rents would be similar to ADU rents (close in size). As ownership options, their affordability would be a little less than ADUs. But we assume that the triplex option, being more costly to build than duplexes (triple kitchens, baths, etc.) and only on corner lots, would likely be much rarer than duplexes.

James Gorter  
8041 SW 8<sup>th</sup> Avenue  
Portland, Oregon 97219  
503-246-5097  
[jcgort@msn.com](mailto:jcgort@msn.com)

**RE: Residential Infill Project Concept Report, November 9, 2016**

Mayor Hales and Commissioners,

My name is Jim Gorter and I am a member of the Residential Infill Project Stakeholder Advisory Committee. I am speaking for the RIPSAC 7, a coherent and cohesive third of the RIPSAC appointees. We have spent many hours in the RIPSAC meetings and many more hours meeting as a group to formulate our analysis and recommendations.

Our shared perspective is to approach planning as neighborhoods, building around centers in neighborhood context while supporting the goals of the 2035 Comprehensive Plan. The extensive written testimony submitted today represents the group's positions and lists the names of the RIPSAC 7 members.

This afternoon and next week you will hear from the members of RIPSAC 7 and from others supporting our analysis and recommendations as they address scale and mass, underlying lot lines, middle housing, demolitions, affordability and other issues.

We make a number of recommendations and I would like to highlight a few that relate directly to the primary reasons the mayor initiated the Infill Project.

First, create development typologies that fit neighborhood context and aspirations and ensure the scale of houses fits neighborhood context. Develop strategies that directly reduce demolitions.

Second, direct density and middle housing around centers consistent with the Comprehensive Plan. Test the middle housing ideas in areas that have expressed need and support before expanding to other parts of the city. Drop the unprecedented, widespread use of the Housing Opportunity Overlay. It is no substitute for good planning and zoning.

Third, allow confirmation of historic underlying skinny and narrow lots only in R2.5 zones.

Finally, put the desires of current residents ahead of those of developers or people who might move to Portland in the next decades.

We care deeply about our city, and we applaud the effort to consider how and where to focus housing density and how to guide the growth of the city in a period of rapid change. The Residential Infill Project was a promising start that ultimately ran entirely off the rails. If the concern is affordability, the project is a false promise. If the concern is equitable housing access in every neighborhood, this was never an Infill Project objective and is a false promise. If the concern is a more walkable lively city, this is a false promise. If the concern is a reduction of house size, this is a false promise, and finally, if this is an attempt to reduce demolitions, no, it will not do that.

## Testimony Regarding the Residential Infill Project Proposal 11/9/16

My name is Barbara Strunk. I am the United Neighborhoods or Reform representative to the Residential Infill Project.

The assertion that this proposal will produce affordable houses does not hold up to close analysis.

1. This proposal will cause the price of land to increase resulting in more expensive houses.
  - a) Up-zoning is at the center of this proposal and causes land prices to go up. The current cost of land in inner eastside Portland is \$400000-\$800000 per demolished house depending on the neighborhood. Yes, developers are buying \$800,000 houses to demolish. With the cost of land acquisition so high, there is no formula that can produce housing units affordable to households making less than 100% of MFI.
  - b) With 64% of single-family houses proposed to be up-zoned we would see a rapid rise in land price. Higher property values give developers more incentive to demolish to get at the valuable dirt underneath. A builder can outbid a family for a house to be demolished and further increase the gap between those with plenty of money and those without enough to buy a house.
  - c) In my neighborhood over the last 3 years:
    - o The average price of a demolished house that was replaced by 2 or 3 houses was \$466,167.
    - o The average **land** cost per new unit was \$264,264 (divide price of demolished house by the number of new houses)
    - o The average **price** of a new house in this group was \$738,464.
  - d) I have seen no analysis of the current state of the market like this done by the City.
- 2) Don't rely on the market to make things turn out ok.
  - a) With this proposal the city has given up all pretense of planning. This proposal is deregulation that allows the imperfect market to determine the future of our neighborhoods.
  - b) Analysts have stated that a key reason we have a housing crisis is that we trust in the private market to solve the problem.  
<http://48hills.org/2016/04/04/panama-papers-show-sfs-housing-marked/>
  - c) The BPS plan states "The proposed rules promote additional housing availability in areas that are highly desirable to many residents due to proximity and good access to services and amenities." The problem is these are areas where the housing market sees rapidly rising land costs and will not be available to people with fewer means.

### 3) Increased Supply does not lead to Affordable Housing

a) One of the underlying themes of this proposal is that if we rezone our inner city and allow for higher density in single-family neighborhoods, we will have more supply of affordable houses. This should put downward pressure on pricing since many of these newly built units will be smaller than what is usually currently built. We debate that assertion.

b) At a recent presentation, a lead Portland planner claimed that if you placed more units on a given piece of land the cost per square foot would be lower. If the land price remained unchanged, yes the cost of the land would be divided among the units. But, land price will go up and the cost per square foot will rise.

c) Analysts debunk the theory that construction of additional housing units will relieve pressure on affordability. The process a study from UC Berkeley calls “filtering” will take 30 years to produce housing affordable to the first time home buyer. Trickle down economics has failed.

<https://escholarship.org/uc/item/7bx938fx#page-1> “Housing Production, Filtering and Displacement: Untangling the Relationships”, Institute of Governmental Studies, UC Berkeley.

d) Duplexes and triplexes are primarily rental housing. Middle class resident owners will be displaced. Portland will transition to a city of investor-owners and renters.

### 4) House size will be smaller and therefore sell for less according to supporters of this plan.

a) The proposal states houses on 5000SF lots will be limited to 2500SF. But when you think about it the house is actually closer to 4000SF: 2500SF for the main house, 1200SF for the basement, and 15% bonus for density.

b) The single economic analysis of this proposal (Appendix A) presumes that the *saleable area* of the structure is 2500 SF for a 5000 SF lot. This is the only analysis we have seen and appears to be based on incorrect assumptions.

c) When is the cost per square foot for a smaller house less than for a larger house? Given the same quality the reverse is true.

d) Most of the homes built on skinny lots are much larger in terms of floor area ratio than the home that was previously on the lot. Even under the new floor area ratios proposed, a builder will maximize profit by building up to the allowable size and new homes will still be larger than the previously existing homes.

### 5) The most affordable homes are the ones already standing, and many of the existing homes are smaller than any of the new homes being built.

a) Developers are buying viable houses for demolition in inner neighborhoods for \$350-800K and one-for-one or 1 for 2 or 3 replacements are being sold for \$550K to \$1.4million.

b) Where is the example of a split lot where the one or two replacement houses are less expensive than the house demolished?

c) Increasing the number of rental or condominium housing units on a site will accelerate speculation, demolition and displacement in the most vulnerable neighborhoods and remove our most affordable housing stock

We must address housing affordability as a regional issue with care and urgency, not as an excuse to provide a handout of speculative profits to developers at the cost of demolition, displacement, and livability.

November 8, 2016  
Testimony  
Residential Infill Project  
Michael J. Molinaro  
RIPSAC member  
4007 SE Taylor ST  
Portland, OR 97214

Centers and corridors. This is the planning precept that we were all asked to embrace during the recent comprehensive planning process. Why, because it's a good one. It encourages growth near transit, services, and jobs. The comprehensive plan uses this phrase 49 times. Maps are dedicated to it. I know this concept works because I live in Sunnyside, through which run vibrant corridors, and it is a center that's the poster child of walkable neighborhoods.

Instead of this infill plan following the comp plan centers and corridors, it blankets the city with a zoning density greater than the R2 multifamily zones. This is unusual as we have heard again and again that there is enough existing capacity to welcome the next 20 years of Portland's growth. And, at your work session last week, staff again reinforced this.

We support additional density around centers and where appropriate along corridors. We do not support the **scattershot densification** proposed in this plan. In my own Sunnyside, I encouraged changing zoning from R2.5 to R2 along sections of Hawthorne and Belmont to allow the "Middle Housing" that we all know is needed. This request fell on deaf ears. These locations at "end grain blocks" and "adjacent to major streets" are exactly where planner Daniel Parolek advocates. In his speech on October 7<sup>th</sup> he stated, "Missing middle is not for everywhere". That advice is clearly ignored in this plan.

At Councils' February 2<sup>nd</sup> "Missing Middle" work session, the idea of testing 7 targeted areas as "Missing Middle Housing Study areas" was presented. (See attached map) We encourage you to act on this suggestion, and test these infill concepts to see if they deliver the hoped for results.

Rod Merrick, AIA. Member of the Residential Infill Project RIPSAC 7  
3627 SE Cooper Street, Portland, OR 97202

Rod Merrick- member of the RIPSAC 7 who served on the committee and devoted hundreds of hours to the process. We come from diverse neighborhood perspectives but a shared concern that these policies and prescriptions are more ideology than planning. The RIPSAC 7 have provided detailed analysis of the document and process in our written testimony including recommendations for moving forward.

I will be blunt: In my 40 years in Portland, this is probably the most far reaching and the most draconian policy document to come out of our once respected planning process; far worse than the skinny lots policies that resulted in blocks of housing demolished, unsightly streetscapes, and angry neighbors.

I highlight the skinny/narrow lots policies **because** using underlying historic lot lines to trump zoning and determine density is the most significant contribution to speculative demolitions in the code. Many of us had hoped that in the RIP, zoning based on the comprehensive plan vision would be restored.

But, rather than removing them from the zoning equation, these lot lines are being used to dictate zoning. All skinny lots in the “overlay”, over 12,000 lots randomly occurring across the city, are to be rezoned to a redefined R2.5 zone. **This policy of diffuse and random density is at the heart of this Report in every area.** It does not support the density around centers, rather it diffuses density. It diffuses travel patterns, reinforces dependence on the automobile.

This Report is being presented as a policy report that Council should politely accept as a cure all for densification without demolition, equity, affordability, and housing choice; and, by some calculation, a way to preserve the character of our neighborhoods.

Rather it is a detailed prescription with complex and contradictory assumptions – a cure far worse than the disease. Appendix A, the economic study, is claimed to be the underpinning. To be polite, it is uninformed. The author uses 2500 square foot of *saleable area* as its basis. As you have seen or will see, the *saleable area* on a 50 x 100 lot is about 4000 SF and larger on larger lots. These are not tiny houses or cute bungalows but large overshadowing structures. The RIP provides far reaching real estate entitlements and lot value increases that will be very difficult to claw back.

Appendix B the Internal Conversion Report demonstrates that remodeling existing single family houses to multi-family, though complicated and expensive, are possible. But even with promised incentives of additional height and area, it fails to demonstrate why a developer would choose to save the existing structure rather than demolish and build a more conventional housing product.

Independent researchers, providing economic analysis and testimony today, have found that far from producing affordable housing the RIP report will remove the most affordable and desired housing types and will cater to the upper end of the market. They suggest that the result will be displacement, accelerated demolition, reduced affordability, and marginal additional real density compared to other housing options. These policies will light a wildfire of demolition when the market is ready.

Rod Merrick, AIA. Member of the Residential Infill Project RIPSAC 7  
3627 SE Cooper Street, Portland, OR 97202

I would like now to turn now to the RIPSAC 7 Summary of Recommendations to the Council and request an extension of time in order to have time to summarize our recommendations.

There are 10 recommendations that we included in our testimony to address the three areas that were the intended focus of the RIP.

- One of them is to cease recognition of underlying lot lines except where consistent with the comprehensive plan zoning map.
- Another is to provide test sites for “innovative” code policies in cooperating neighborhoods before applying them broadly.

We would like to leave you with these further thoughts:

The BPS needs to better understand how the current R1, R2 and R 2.5 zones can be improved to accommodate “middle” or transitional housing densities.

We need implementation of the Comp Plan in the form of a modern, flexible and easy to understand zoning code.

Once we have an approved Comp Plan, there needs to be an **ongoing focus on district and neighborhood planning**. Place based Neighborhood and business associations need to be engaged to participate in decision making during these planning exercises.

---

We have established that the recommendations in this Report **are not** consistent with the goals of the Comprehensive plan on many levels. The recommendations **are not** aligned with the Mayor’s stated objectives to reduce demolitions, and meaningfully temper scale of housing. Who can say that it will produce desired housing alternatives? The recommendations will result in diffuse density, **not** density and smaller scale housing around walkable centers.

Today, we have a shortage of housing. Not a shortage of land, and not a shortage of land zoned for housing. The misuse of a **Housing Opportunity Zone Overlay** is no substitute for planning. It **is** an attempt to bypass the comprehensive plan rezoning process. On its face it is little more than a bone thrown to speculators, some developers, and housing advocates without regard for the existing fabric of the city ....an unlikely grand bargain..between 1000 Friends of Oregon and the homebuilders.

Finally, we ask that this Report **not be accepted** by Council for the simple fact that it will not meet the intended goals and will do irreparable harm to what we do have.

WE challenge ourselves and all Portlanders to think in terms of a vision for Portland that builds on the good neighborhoods we have before we do irreparable harm with the poorly conceived policies represented in this Report. To achieve this will require significant reassessment and fresh ideas.

Rod Merrick, AIA. Member of the Residential Infill Project RIPSAC 7  
3627 SE Cooper Street, Portland, OR 97202

Agencies & commissions



# City of Portland

## Design Commission

1900 SW Fourth Ave., Suite 5000  
Portland, Oregon 97201  
Telephone: (503) 823-7300  
TDD: (503) 823-6868  
FAX: (503) 823-5630  
[www.portlandonline.com/bds](http://www.portlandonline.com/bds)

November 30, 2017

To: Morgan Tracy, Bureau of Planning & Sustainability

Re: Residential Infill Project Summary

The Design Commission is in full support of the creation of an “a” overlay zone and increasing density in R2.5 – R7 zones. We do however have several concerns regarding the discussion draft that was presented to the Design Commission on November 2<sup>nd</sup>.

1. There is an inherent contradiction in reducing the FAR on residential lots and then encouraging the construction of more housing units on those same lots. A better approach would be to keep the current FAR standards in place, 1.35 for the R5 zone or limit the reduction to an FAR of .75 – 1.0 and then allow an increase of 750 sf per detached structure. Apply similar adjustments to the R2.5 & R7 zones.
2. Restrictions on building height should better reflect the context. Some neighborhoods currently have a large number of three story homes. To maintain the context that already exists, development of three story homes should be allowed on lots where 50% or more of the existing houses on the same side of the street or across the street are three stories.
3. The elimination of parking requirements for development that provides units at 80% MFI is an admirable incentive to help facilitate the development of additional affordable housing; however, the lack of on-site parking will certainly be burdensome to neighborhoods due to increased on-street parking. On the other hand, it is not desirable, either, to provide multiple curbside cuts or garages for multiple units. Consider retaining some minimum, but reduced, parking requirement on these sites.
4. The addition of FAR maximums to residential sites, the limitation placed on floor area allowed for accessory structures, and the exemption of below-grade floor area from counting towards the FAR limit, whether living area or parking area, will promote the development of additional tuck-under, below-grade garages. Like garages located at the front of, or in front of, houses, these tuck-under garages create poor architecture and poor streetscapes. Garages are best kept behind the house. To limit the detrimental impact of tuck-under garages on Portland’s streets, consider allowing an FAR exemption for a single-car garage that is located behind the primary house.

5. Encourage the continued use of SDC waivers in the “a” overlay zone.

We support efforts to allow more flexibility in the development & re-development of residential lots in the City. Neighborhoods with a variety of available housing sizes makes for a more diverse & inclusive City.

Sincerely,



Julie Livingston, Chair



Tad Savinar, Vice Chair



Jessica Molinar



Don Vallaster



Sam Rodriguez



Andrew Clarke

Design Commission

cc: Brandon Spencer-Hartle, BPS  
Hillary Adam, BDS  
Benjamin Nielsen, BDS



**City of Portland**  
Historic Landmarks Commission

1900 SW Fourth Ave., Suite 5000 / 16  
Portland, Oregon 97201  
Telephone: (503) 823-7300  
TDD: (503) 823-6868  
FAX: (503) 823-5630  
[www.portlandonline.com/bds](http://www.portlandonline.com/bds)

**November 30, 2017**

To: Morgan Tracy, Bureau of Planning & Sustainability

Re: Residential Infill Project Discussion Draft

Thank you for briefing the Portland Historic Landmarks Commission (PHLC) on October 23, 2017 regarding the Residential Infill Project Discussion Draft. We appreciate and support much of the work in the discussion draft; however, we have concerns that not enough has been included to limit demolitions and provide incentives to retain older housing, and that neighborhood compatibility may be compromised by certain provisions.

***Preservation of properties on HRI and of non-inventoried properties***

The PHLC deals frequently with residential-scale infill development proposals in Historic Districts or with proposals that are part of designated Historic Landmarks, unlike the Portland Design Commission, which more often reviews larger-scale projects. Infill projects require sensitivity to context whether or not the site is part of a formally designated historic district. We are concerned with protecting undesigned historic resources in the older areas of Portland (most of which are in the proposed “a” Additional Housing Opportunity Overlay zone). Some of these resources have been identified through past studies—such as the 1984 Historic Resource Inventory (HRI)— but many others with historic value have not yet been surveyed or identified, and have no protection from demolition, unlike those classified as contributing structures in Historic Districts or Historic Landmarks. Preservation of older resources helps Portland achieve sustainability goals, defines the unique character of Portland’s neighborhoods, and typically does not prevent greater density on a site. Since the proposed “a” overlay zone potentially covers thousands of these historic properties, the PHLC wants to ensure that the ability to construct additional dwelling units in the form of duplexes and triplexes does not further incentivize demolition of older houses. **Rather than adding restrictions to the demolition of these undesigned resources, additional disincentives to demolition should be proposed and incentives should be provided to help retain undesigned but potentially significant historic resources.**

***Expand incentives to preserve housing older than 50 years***

Additional density allowances are proposed for historic resources in section 33.405.070 of the Discussion Draft code. As proposed, these provisions may apply to houses and duplexes in Historic or Conservation Districts, Historic or Conservation Landmarks, or those with Rank I, II, or III on the HRI. **We encourage you to consider applying these additional standards and incentives for preservation more broadly—to any structure older than 50 years.** We acknowledge that some houses that are not historically significant will be eligible for this incentives “track,” but since it is a voluntary option it may help to save older resources. This is particularly important given the amount of time that has elapsed since the last Historic Resource Inventory, as structures 50 years or older are generally considered eligible to be considered for historic resource designation at the state or federal level.

We would also like to discuss avenues for providing additional incentives for preservation of designated and undesignated historic houses. These incentives could help to tip the scale in favor of preservation of existing older houses, reducing the number of demolitions of undesignated but potentially-historic houses, without burdening property owners with additional fees or onerous process.

### ***Neighborhood Compatibility***

Three of the potential code changes are raising concern among the PHLC: provisions simplifying the creation of cottage cluster developments, the allowance for two detached ADUs in Historic Districts, and provisions for the addition of floor area to an existing historic structure. Any Historic District must be understood as a single historic resource. The most critical aspect of a historic district is not any individual building, but the cohesion of the district's component parts, both new and old. One should be able to visibly see a relationship of the collection of structures to each other within a Historic District. Scale and massing are often the most critical aspects of compatible design in a historic district, because compatibility cannot be achieved through materials and detailing alone. **The cohesion of an entire Historic District can be negatively affected by a single development that is significantly out of scale with the others, thus jeopardizing the historic status of all properties within the district.**

- **Cottage cluster-type development** is not always in keeping with the character of any of Portland's existing or potential Historic Districts. Many historic districts do, however, have low-scale, multi-family housing that should be studied as an appropriate model for infill in older single-dwelling residential neighborhoods. Some of these historic models, such as courtyard apartments, use land and resources much more efficiently than freestanding "cottages." Additionally, though cottage clusters of up to 10 units may be reviewed through a staff-level, Type IIx planned development review, this should not supersede any historic resource review requirements that may also apply, and it should be noted that the PHLC may not support cottage cluster developments proposed in certain Historic Districts because this model may not support the neighborhood context.
- While the allowance proposed in 33.405.070.C to allow up to **two detached ADUs on historic properties** is admirable in its attempts to preserve existing historic housing, the same allowance could lead to consequences that are out of scale and character with other development in the neighborhood, creating a jumble of smaller units and losing open space or tree cover. In some scenarios, it may make more sense to allow these two detached ADUs to be able to be combined into one accessory structure. This needs to be weighed against the concern that the accessory structures should not generally be larger in scale or height than the primary structure.
- Third, we have concerns that provisions allowing for the **addition of up to 800 square feet, or the addition of up to 100% of existing foundation footprint area**, to existing historic structures will significantly change the historic character of these houses. These provisions should be excluded from historic districts and historic landmarks entirely, as any exterior alteration requires historic resource review. The area allowed for expansion on other historic structures should also be further restricted, though it should be noted that we support the ability for owners to make small changes to these properties without triggering onerous standards or reviews.

The PHLC is also concerned about some of the proposed development standards that would impact the character of new houses and accessory structures in historic neighborhoods. Discussion Draft development standards encourage the development of **tuck-under garages** to reduce their perceived impact on the relationship of the building to the street and to reinforce a pattern of wider facades on narrow-lot houses. The application of Floor Area Ratio limits to residential uses will further promote the

creation of tuck-under garages since they will not count towards a site's floor area if they are located four feet or more below grade. Yet tuck-under garages of this depth have a large and often negative impact on the streetscape of older or historic districts in two ways:

- They create a **visual interruption of the street pattern**. The garage ramp forms a void cutting through the entire street setback area of a residence, interrupting what is generally a common block topography and creating hard surfaces on three sides. Detached garages set behind the primary house are almost always more appropriate and should be promoted rather than penalized.
- The incentivization of tuck-under garages also tends to result in **porches high above the ground plane**. Porches above tuck-under garages are often located well-above those on other nearby houses, which can have negative impacts on the pedestrian realm and the character of historic districts and older neighborhoods. A consistent porch height, allowing for some variation, should be encouraged through development standards in the same manner as the new front setback standards.

The PHLC has some concerns with the proposed setback standards, too. These standards—in particular the front setback standards—should be more flexible to require that setbacks match the context of existing neighborhoods better, rather than presenting an arbitrary distance that may be visually disruptive to the character of a neighborhood or district. Additionally, the proposed changes to the side setback standard exceptions to allow an eave to project two feet into a five-foot setback would be disruptive to the side yard character of many districts, and would also further diminish light that a neighboring house would receive.

Finally, we recommend the following actions that could help to further refine the proposals in the Residential Infill Project:

- The Bureau of Planning & Sustainability should engage the Bureau of Development Services to **reconsider existing SDC waivers and grant those preferentially to projects which retain and preserve historic houses**, such as the addition of ADUs or the division of a large house into a duplex or triplex; waivers granted to demolition of existing houses should be rescinded.
- The PHLC volunteers to attend a workshop with Bureau of Planning & Sustainability staff to work to identify additional incentives that could be included in the Recommended Draft to preserve historic structures.

We thank you for your time and consideration of these requests, and we look forward to continued discussion with you, Brandon, and BPS staff regarding these proposed policy and regulatory changes.

Sincerely,



Kirk Ranzetta  
Chair



Kristen Minor  
Vice Chair

cc  
Brandon Spencer-Hartle, BPS  
Hillary Adam, BDS  
Benjamin Nielsen, BDS

November 28, 2017

Director Anderson  
Residential Infill Project Staff  
Bureau of Planning and Sustainability  
1900 SW Fourth Avenue  
Portland, OR 97204

Dear Director Anderson and City Staff:

Thank you for this opportunity to comment regarding the Residential Infill Project (RIP). On November 16, the Urban Forestry Commission continued its discussion and voted to authorize this letter with our recommendations. We are reiterating and clarifying the requests we made in a letter dated November 8, 2016. (That letter is attached.)

Specifically, we are asking that BPS interpret Guiding Principle 4, Environmental Health, to mean providing additional space to grow and preserve trees as an aspect of preserving nature in the city, generally:

*4. Environmental Health*

*Weave nature into the city and foster a healthy environment that sustains people, neighborhoods, and fish and wildlife. Recognize the intrinsic value of nature and sustain the ecosystem services of Portland's air, water, and land (RIP Discussion Draft, p. 4).*

As it stands, the proposed code amendments do not implement this principle in such a way as to preserve and make room for trees. We recommend that RIP make the following changes:

- Increase minimum setback on one side setback, rear setback, or both setbacks beyond the current 5 feet minimum
- Maintain the current code front setback
- Reduce the overall maximum building footprint in order to meet minimum root and canopy requirements on the lot
- Add code language requiring that garages and ADUs must be configured to accommodate space to meet minimum tree planting requirements
- Require a minimum tree density/canopy where landscaping requirements are in place

Additionally, we propose that the Required Outdoor Area standard, 33.110.235 be reworked to optimize space for trees:

- Require that decks be considered a pervious surface, along with pervious paving on the ground plane, so that trees may be preserved and planted within the deck or paving area
- Restrict impervious driveway paving to the space between the front property line and the front setback
- Restrict outdoor covers when they interfere with canopy and trunk location



CITY OF PORTLAND

# URBAN FORESTRY COMMISSION

1120 SW FIFTH AVENUE, PORTLAND, OREGON 97204

PHONE 503-823-5396 FAX 503-823-5570



AMANDA FRITZ, COMMISSIONER

MIKE ABBATÉ, DIRECTOR

The Urban Forestry Commission appreciates your attention to and consideration of these recommendations that will properly balance the needs of a growing city and its green infrastructure. Whether it's equity, economic prosperity, human health, environmental health, or resilience, trees are living and growing infrastructure and must have a place in our growing city.

Sincerely,

Mark Bello, Chair, Urban Forestry Commission  
Catherine Mushel, Secretary, Urban Forestry Commission  
Meryl A Redisch, Chair, Policy Committee, Urban Forestry Commission

Cc. Jenn Cairo, City Forester  
Morgan Tracy, BPS



600 NE Grand Ave.  
Portland, OR 97232-2736  
oregonmetro.gov

November 6, 2017

Morgan Tracy  
City of Portland Bureau of Planning and Sustainability  
Attn: Residential Infill Project  
1900 SW 4th Avenue, Suite 7100  
Portland, OR 97201

Re: Comments on Residential Infill Project discussion draft

Dear Mr. Tracy:

There are many people – teachers, small families, college students, first-time homebuyers, and downsizing retirees – that are looking for housing in Portland’s walkable neighborhoods, but are struggling to find the variety of housing that meets their needs and budget. Our region’s changing demographics – with more one- and two-person households and an aging population – demand creative housing solutions.

I am writing in support of the city’s discussion draft for the Residential Infill Project since it will help to provide more housing choices in Portland’s in-demand neighborhoods. Metro’s January 2016 Opportunities and Challenges for Equitable Housing report identified increasing the supply and diversity of market rate housing as essential to meeting housing demand and ensuring overall housing affordability throughout the region. The report identified the need to increase the availability of “missing middle” housing to provide more choices for people who wish to live in Portland’s walkable communities.

Generally, I believe that the city’s proposal would advance those goals. These missing middle housing types used to be built in Portland’s neighborhoods and are – along with the people that live in them – part of what gives these neighborhoods their character. To meet the city and region’s goals of housing affordability, walkability and reducing carbon emissions, these varied housing types are needed more than ever. Below are a few comments about aspects of the discussion draft.

Scale of houses

The proposal seeks to address concerns about the scale of new housing. While Metro does not have a position on the proposed scale of new homes in neighborhoods, I believe that seeking a balance is a worthwhile effort if it can lead to people having more choices of housing. The proposed use of floor-area-ratios is a good way of providing flexibility while also addressing concerns about the size and cost of new homes.

Housing opportunity

The proposal seeks to expand housing choice in high-opportunity neighborhoods – those with access to transit, jobs, amenities, etc. I concur with this approach and encourage the city to add the “a overlay” along the proposed route for the Division bus rapid transit line. Longer term – in anticipation of the region’s next light rail line – please also consider adding the overlay along the Southwest Corridor.

Lastly, to accompany the policies being contemplated in the Residential Infill Project, I encourage the city to extend its waiver of ADU system development charges. These waivers have been another important aspect of encouraging the development of a greater variety of housing types.

The City of Portland plays a crucial role in the future of the greater region. We appreciate the leadership that the city would demonstrate by providing people with more housing choices. Thank you for considering our comments.

Respectfully,

A handwritten signature in black ink, appearing to read "Megan Gibb", written in a cursive style.

Megan Gibb  
Land Use and Urban Development Manager



November 30, 2017

Morgan Tracy  
Project Manager  
City of Portland Bureau of Planning & Sustainability  
1900 SW Fourth Avenue | Suite 7100 | Portland, OR 97201

November 30, 2017

Dear Mr. Tracy:

TriMet supports the City of Portland's Residential Infill Project. The Residential Infill Project represents a means for the City to encourage additional housing choices in areas that are located near transit, jobs, and a range of other amenities.

Providing opportunities for new housing near existing and future frequent service bus lines and MAX stations aligns well with the goals of TriMet's Service Enhancement Plans, which aim to develop more and better service for neighborhoods, supporting economic development and improving access to jobs, education and other everyday needs.

As Portland's population grows and our road network becomes more congested, TriMet is also working closely with the City of Portland to develop and put into place a range of tools (Enhanced Transit Concepts) to improve bus speed and reliability along the corridors our riders rely on most to reach their destinations. This will be especially important in areas where infill development could add to already crowded roadways. It is imperative to make transit an attractive option in these areas if the transportation system is going to function in line with goals and strategies laid out in the City's Comprehensive Plan and Transportation System Plan.

As TriMet and the City continue to work in partnership on implementing these shared visions, TriMet would encourage the City of Portland to use larger buffers (1/3-mile buffers for frequent service bus lines, and 1/2-mile buffers for LRT and BRT), given that research has shown that riders are willing to walk farther to access high-quality transit that offer greater amenities and reliability. We would be happy to work with City staff on incorporating this information and approach into City analyses and policies.

Sincerely,

A handwritten signature in black ink that reads "Kerry Ayres-Palanuk". The signature is written in a cursive, flowing style.

Kerry Ayres-Palanuk  
TriMet Director, Planning & Policy

Housing developers

Portland Bureau of Planning & Sustainability  
1900 SW 4<sup>th</sup> Ave, Suite 701  
Portland, OR 97204  
Attn: Residential Infill Project staff

November 30, 2017

Dear Portland city staff and decision-makers,

The Build Small Coalition is a group of public, private and nonprofit small home advocates who work together to encourage development of and equitable access to small housing types throughout greater Portland. We believe that smaller housing options advance equity, livability and environmental goals. The coalition advances this work through research, policy innovation, education, outreach and new partnerships.

We are writing in support of the city's discussion draft for the Residential Infill Project. We appreciate the city's efforts to eliminate barriers for the creation of new housing for our low- and middle- income families, given the housing crisis faced by our region. Many of the actions outlined in the draft will provide the flexibility needed to facilitate more and a greater variety of housing options; support walkable, amenity-rich neighborhoods; and respond to the differing needs of our increasingly diverse community.

Below are our suggestions on how the proposal can more effectively reach its stated goals, and can help ensure that all Portlanders benefit from greater flexibility in affordable housing options, and contribute toward making Portland a more equitable, prosperous and healthy city.

### ***Scale of Houses***

We agree with the city's proposal to limit the size of homes to be more compatible with Portland's existing neighborhoods. We also agree with the allowance of an additional .15 FAR for detached structures to encourage the construction of accessory dwelling units.

We do request that city staff further analyze the FAR calculation for duplexes and triplexes, to better understand whether or not the provision as currently drafted will actually encourage building these types of homes over single-family homes. We encourage city staff to look at other comparable cities and markets to anticipate what kind of impact this provision may have on development patterns.

### ***Housing Opportunity***

*Allow the "Housing Opportunity Overlay" provisions in all neighborhoods*

- We believe choosing to extend the provisions afforded in the "Housing Opportunity Overlay" only to select areas will exacerbate inequities across the city. As is, the proposal denies a majority of East Portland neighborhoods the benefits afforded with

greater density, including more housing choice, transit access and walkable neighborhoods, and thriving local commercial districts. While we appreciate that there are concerns about displacement of vulnerable populations, we believe that excluding these areas from opportunities for new investment in greater housing choices is not the right course of action. One solution to help address this concern would be to couple allowance of smaller housing options with affordability incentives in neighborhoods that are most at-risk.

#### *Internal Conversions*

- We believe that internal conversions of existing homes into multiple units should be allowed and incentivized in all neighborhoods. Not only will providing this flexibility help to reduce the number of home demolitions, but it also opens up different housing options that serve a range of household types, all while preserving the character of existing neighborhoods.
- We also believe the city should explore providing additional incentives for housing preservation and adaptive reuse of single-family homes into multiple smaller units.

#### *Create a cottage cluster code that encourages development*

- We appreciate the recommendation to allow cottage cluster developments in neighborhoods throughout the city. We believe the code should identify and recognize the main elements of cottage clusters developments, including small home sizes, homes oriented to shared courtyards, and parking at the periphery of the development (if any). We urge city staff to look at other successful examples of implemented cottage cluster codes across the nation, and use them as a resource when developing the city code. One of Metro's Community Investment tools, [Innovative Design and Development Codes](#), offers a few provisions and case studies to look to.
- We believe that this type of development should be allowed by-right, and that the city should provide density bonuses in exchange for the provision of a higher number of smaller homes on land that would otherwise be developed with single-family homes.

#### *Allow for smaller housing options (duplexes, triplexes, cottages, multiple ADUs)*

- We wholeheartedly agree with the recommendation by city staff to provide for a greater variety of smaller housing options. Smaller homes are not only more energy and resource efficient but they also allow a greater number of families of all backgrounds to live in walkable, amenity-rich neighborhoods supported by transit. Smaller homes also contribute to population densities that generate the necessary conditions for walkable neighborhoods and thriving commercial districts.
- We also want to voice our support for the inclusion of a provision allowing two accessory dwelling units, one attached and one detached, on every single-family lot.
- We support the visitability requirements for a second additional unit on the property—a key strategy to help adapt our existing housing supply to support aging in place.

- Finally, we urge staff to continue providing flexibility for ADU development by eliminating other remaining barriers. We suggest the following:
  - For attached and internal ADUs, eliminate the code provision allowing only one ground-level main entrance located on the street-facing façade. We don't believe the sight of a second door from the street on a single-family home harms neighborhood character; for example, there are many existing duplexes in Ladd's Addition with two doors facing the street.
  - Allow the two ADUs built on a property with a historic home to be attached to each other, even if they are both detached from the house.
  - Allow both ADUs to be attached (or internal) to historic homes.

### ***Historically Narrow Lots***

We appreciate staff's effort to provide a broader range of housing options that are affordable to more Portlanders. We want to reiterate our support for narrow lot home development that allows for reduced land costs, one key strategy that allows these types of housing options to flourish.

We appreciate your consideration of our comments and look forward to continue working towards providing more, affordable smaller housing options for our community.

Respectfully,

Members of the Build Small Coalition



# Portland **Small Developer** Alliance

November 28th, 2017

City of Portland Bureau of Planning and Sustainability  
Attn: Morgan Tracy, Project Manager  
1900 SW 4th Avenue  
Suite 7100  
Portland, OR 97201

RE: Residential Infill Project

Dear Mr. Tracy,

We, the Portland Small Developer Alliance, are small developers and allies who create missing middle housing in Portland. As locals enmeshed in the boots-on-the-ground work of building vibrant neighborhoods in Portland, we appreciate the leadership that council has shown in bringing back these important forms of housing that used to be regular fixtures in every Portland residential neighborhood.

Staff has clearly worked diligently to translate council's recommendations and align with the goals of the 2035 Comprehensive Plan<sup>1</sup>, Climate Action Plan<sup>2</sup>, and Oregon's Statewide Planning Goal 10<sup>3</sup>. The intent of the RIP is in service of today's residents as well as future generations of Portlanders. We agree--given the Housing Emergency declared by the mayor in 2015 and extended by Council ever since--we need *more* housing options available to *more* residents in *more* neighborhoods in Portland.

Your work on the RIP will have significant and lasting impacts on the livability of our city today and in decades to come. It's small developers and local property owners (not non-profits or large investment funds) who will build the lion's share of new missing middle housing here. We're at a critical crossroads for the future vitality, affordability, and sustainability of Portland. If the RIP wants to make a substantive, lasting, and positive impact, it *must* anticipate and incorporate its own likely practical and economic outcomes. We in the PSDA are real-life boots-on-the-ground experts. We can help by sharing our experience concerning the likely practical impacts of the current draft--and how it might better meet the stated goals of a)

Portland's 2035 Comprehensive Plan<sup>1</sup>, b) the Climate Action Plan<sup>2</sup>, c) Oregon's Goal 10<sup>3</sup>, and d) the City's Housing Emergency.

To that end, we are focusing on 5 broad categories: 1, Unit Count; 2, Incremental FAR; 3, Building Heights; 4, Setbacks, and 5, The "a" Overlay.

**1: Unit count.** Given the high cost of land and development in Portland, new single family houses affordable to average residents cannot be built (without some sort of subsidy). One way to ease the strain is to divide land costs among more units to decrease the cost of new housing on a per-unit basis. In the mortgage industry, up to 4 units is considered a "single family house" and is eligible for conventional and FHA residential financing. If building 4 units will decrease the cost of each unit, why only allow up to 3 units?

Allowing 4 units *by right* will promote the development of four-plex housing, decrease sprawl, and lessen commuting burdens on Portland families. Placing restrictions on allowable rents (as the current RIP stipulates for four-plexes) will not produce any new four-plexes because those units will not rent/sell for prices that would allow any private (i.e., non-subsidized) project to be financially viable, and would introduce an element of risk that is untenable for private developers.

We do want more units that are affordable to people who are below the median income, however. To that end, we encourage the expansion of programs already in place for public and subsidized housing, and *allowing 5 or more units in developments that include affordable units in the same ratio as current inclusionary zoning rules* (i.e. 20% affordable units).

We small scale developers look forward to remaining a part of the conversation about how to provide more affordable housing units in Portland. Such a conversation should likely include providing a programmatic path towards SDC waivers, tax exemptions, direct tenant subsidies, and other incentives for nonprofits that specialize in affordable housing.

Four-plexes were once a common housing type within and among single family neighborhoods in Portland. Those units are highly desirable homes for many Portlanders today. Let's bring back the four-plex so more families can live closer to work, home, and play.

**2: Incremental FAR.** Today's zoning in zones R5 and R2.5 allow 2 units (one house plus attached or detached ADU) with a FAR of up to 1.5. Neighborhood associations worry that this scale could overpower their streets. While no infill developer in Portland has yet to maximize allowable FAR, we understand residents' concerns. The historic character of our neighborhoods is important to uphold, *and*, single family zoning was only introduced in the 1950s. It doesn't reflect the long history of diverse housing types (from duplexes to mid-rise apartment

buildings) built across many Portland neighborhoods, from the NW Alphabet District to Irvington and beyond. These are some of the most diverse and desirable neighborhoods in the city.

While we advocate that zoning in RF through R2.5 match banking standards (allowing up to four-plexes by right), these four-plexes (and duplexes and triplexes) won't get built if the per-square-foot cost is too high for most buyers and renters. **The RIP's limit of 2,500 sq ft + 750 sq ft detached ADU on a 5,000 square foot lot will primarily promote the construction of more single family houses.** This is because bathrooms and kitchens cost much more to build (and buy) than do bedrooms and storage. A triplex or four-plex unit of 833 or 625 sq ft--at today's costs to buy, build, and permit in Portland--would have to be a luxury unit to be financially viable for any developer. Such a unit would appeal mostly to individuals without children, and would likely house only one or two people. While this is an important market segment, it neglects families with children and individuals making the median income in Portland.

If those four-plex units could be built for a similar cost (i.e. keep the same number of bathrooms and kitchens) but with an additional 1-2 bedrooms and storage space (e.g. 1,200 to 1,500 sq ft per unit), on a per-square foot basis, these units would be affordable *and desirable* to middle income families, roommates, and intergenerational families. In short, we can't address affordability by limiting supply. This is true for unit counts as well as square footage.

If we continue to force out families to surrounding cities, Portland will lose its history, heritage, and intellectual capital. We need families of all incomes in Portland to set down roots and contribute to our economic vitality. Without families, and with housing prices only affordable to the most affluent 20%, Portland will inevitably become that which the RIP, Portland Plan<sup>4</sup>, Comp Plan, and Statewide Planning Goal 10 are actively seeking to avoid--the dreaded "playground for the rich."

There are thoughtful ways to design financially accessible and family-friendly four-plexes that integrate into their neighborhoods. We see these buildings (without even realizing it) all across Portland every day. The mutual goals of city staff, local leaders, and small developers include a diverse range of housing types that make our city and neighborhoods more livable, walkable and vibrant. An incremental approach to FAR--based on number of units--would encourage this. Incremental FAR would slash today's allowable FAR by  $\frac{2}{3}$  when just a single house is built, but it would incentivize more housing units with incrementally higher FARs (still lower than our current maximum FAR) for each additional housing unit built.

For each additional unit beyond the first, we recommend a FAR allowance of .2 per additional unit in RF through R7 zones, and .25 per additional unit in R5 and R2.5 zones. (As per the RIP recommendation, basements should not be included in the FAR.)

FAR per:	RF, R20, R10, & R7	R5	R2.5
1 unit	.4	.5	.75
2 units	.6	.75	1
3 units	.8	1	1.25
4 units	1	1.25	1.5

A wide range of unit types and sizes will best serve our growing city’s needs, both today and tomorrow. With incremental FAR, each unit can provide housing for different family sizes, roommates, nontraditional living situations, and intergenerational living--reflecting the true ways in which Portlanders of all generations actually live. **Rather than the city incentivizing more single family houses, this incremental FAR would incentivize developers to quadruple the number of units they build**, allowing more people to live near their work, raise kids near grandparents, support neighborhood small businesses, and facilitate vibrant, diverse, and inclusive communities across Portland.

**3: Building Height.** We don’t like ugly McMansions! However, reducing allowable house height--while Portland is in the middle of a housing crisis--is disastrous. It’s disastrous from an affordability standpoint. It’s disastrous from a political perspective. And it’s disastrous for our future generations. Change is the only constant. In a growing and desirable place to live like Portland, we can’t afford to go backwards.

Those who advocate reducing house height argue, “but basements don’t count!” Here is the reality, and how it will play out on the ground. On a perfectly level lot, adding a basement could add some (albeit potentially less desirable) living space. But that living space? It will cost buyers and renters an extra \$100,000 over and above what that same amount of space would have cost had the home been built on a slab foundation. Does Portland want to promote affordability and diversity? Forcing builders to rely on basements to meet the demands of the market increases housing costs for everyone.

Second, and more importantly, on sloped lots: under the current RIP, basements are no longer basements. They are the first story. This is because the RIP wants to measure heights from the lowest point on the lot instead of from the highest point, as current zoning allows. So instead of

a 2.5 story house with a basement, sloped lots will only be allowed a 1.5 story house with a basement.

Again, during a housing crisis and when the city is growing by 100+ individuals per day, are neighborhoods replete with 1.5 story single family houses the legacy that today's leaders want to leave for our grandchildren? Why should our suburbs allow larger structures in residential neighborhoods than Portland, the central city of our region?

*If anything*, as in every city across the globe, building heights must *increase* as population increases. To encourage more housing units, a recommendation for incremental height increases for unit increases would be a win-win. Neighbors would have no grounds for complaint about the loss of "affordable" old homes when 4 units replace one.

To encourage development of sloped lots, facilitate more housing units, and to address neighbors' concerns about large houses, **we recommend measuring from the midpoint elevation adjacent to a structure (which is lower than today's allowable height) with the following incremental height system:**

Height in feet for	RF through R7	R5	R2.5
1 unit	30	30	35
2 units	30	30	35
3 units	35	35	40
4 units	35	35	40

Measuring from the midpoint still reduces allowable heights for single detached houses and duplexes, but it facilitates development of more housing units via a small 5' incentive (based on the new standard measuring from average grade) for triplexes and four-plexes.

Further, the height calculation should clarify that a two-and-a-half-story house will always be legal in all zones, and that height on flag lots and for all other allowed housing is consistent with the table above.

Change is inevitable. We cannot grow as a city without either growing out or growing up. There is no other way. We cannot grow out, so we must grow up.

**4: Setbacks.** Setbacks cannot be increased without consequence. Increasing front setbacks will result in smaller backyards. Smaller backyards mean fewer opportunities for ADUs, fewer private outdoor spaces, fewer backyard trees, and fewer recreational opportunities. Larger front yards mean more lawns, more time spent mowing, more fossil fuels and water wasted, and fewer opportunities for future development.

Matching the setbacks of adjacent houses only helps in a few--but not most--circumstances.

People don't use front yards in the same way as they do backyards. Decreasing backyard size will result in fewer opportunities for Portland's future growth. In cities around the world, increasing population means *smaller* setbacks. We have an increasing population. By ignoring our current reality and nonetheless increasing minimum setbacks (which are only minimums--developers are still free to choose 15' setbacks), the city is kicking the can of today's problems onto our children and grandchildren. And by that time, our problems will have snowballed. It will be much harder to add future density (without completely razing existing houses) once all the backyards have been suffocated by front lawns.

**5: 'a' Overlay.** The new 'a' overlay is intended to increase housing opportunity. However, the "a" overlay is not applied evenly or equitably across the city. The RIP attempts to prevent gentrification and displacement by denying resident homeowners in areas "at risk" the same opportunity that it provides to homeowners in affluent neighborhoods. We believe this approach is wrong and not in the best interest of the neighborhoods or residents that will be denied opportunity. Multiple neighborhoods left out of the current overlay want to be included; Cully Neighborhood is one example. If the RIP is indeed a tool to increase the supply of housing and create opportunity for people to live in desirable neighborhoods, then we should bestow this opportunity evenly and fairly--to *all* neighborhoods in the city.

Limiting where the "a" overlay is applied denies the residents in omitted areas the opportunity to improve their lives by adding units to existing housing stock. New development would increase the number of rental units, prevent displacement by maximizing under-developed lots (rather than completely razing and rebuilding existing structures, which otherwise inevitably occurs in growing cities when demand is high but supply is low), and act as a catalyst for building the type of generational wealth that policy makers have historically denied to disadvantaged populations. Adding units to existing properties allows families to stay in the neighborhoods they grew up in, supplementing their income with rental income even when property taxes rise. The 'a' overlay should be applied broadly and evenly across the city to all residential neighborhoods, and in all properties zoned RF-R2.5. All residents should have equal opportunity.

In conclusion, according to the Johnson Economics Report<sup>5</sup>, the RIP as currently drafted will turn Portland's "single dwelling" zones into enclaves that block homeownership opportunity to all but the highest income residents. As a consequence of buyers who want homes larger than 2,500 square feet being forced to compete with buyers looking for moderately sized homes, the price per square foot of new houses will increase. Given a restricted supply of houses and net population increases, this will further accelerate price appreciation of both new and existing homes, and homeownership will soon become out of reach for middle-income Portlanders.

These adjustments to the RIP proposal would allow small developers to work with neighborhoods, and neighbors to become small developers, to provide the diversity of housing types that are essential for Portland's success and vitality as we grow and change. Let's not only legalize but also bravely encourage true missing middle housing, including four-plexes, in our residential neighborhoods. Let's run the experiment. Let's find out if Portland's new generation of housing can achieve Portland's vision for vibrant, walkable, and affordable neighborhoods--not only ourselves, but also for our children's children. We have nothing to lose if we do, yet everything to lose if we don't.

Signed,

*The Executive Committee of the Portland Small Developer Alliance*

R. John Anderson, Mary Vogel, Garlynn Woodsong, Danielle Zeghib

[www.pdxsmalldevelopers.org](http://www.pdxsmalldevelopers.org)

cc: Susan Anderson, [susan.anderson@portlandoregon.gov](mailto:susan.anderson@portlandoregon.gov),  
Joe Zehnder, [joe.zehnder@portlandoregon.gov](mailto:joe.zehnder@portlandoregon.gov)

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<sup>1</sup>Portland's new Comprehensive Plan Policy 5-6 clearly calls for the City to encourage and enable the development of middle housing types.

<sup>2</sup>Creating more missing middle housing affordable to median-income households will allow more folks to live low-carbon lifestyles, allowing Portland to comply with Objective 4 of its 2015 Climate Action Plan to create vibrant neighborhoods where 80% of residents can easily walk or bicycle to meet all basic daily, non-work needs.

<sup>3</sup>Oregon Statewide Planning Goal 10 clearly states that "plans shall encourage the availability of adequate numbers of needed housing units at price ranges and rent levels which are commensurate with the financial capabilities of Oregon households and allow for flexibility of housing location, type and density."

<sup>4</sup>"The Portland Plan Progress report from 2/2017 highlights insufficient supply (Pg. 19) as the primary driver of rising housing affordability concerns for low and middle income residents"

<sup>5</sup>The Johnson Economics Report from October 17, 2016 on the impacts of the draft Residential Infill Project clearly show that none of the alternatives analyzed will be affordable to a household earning Portland's Median Family Income.

November 30, 2017

To: Mr. Morgan Tracy and Bureau of Planning and Sustainability staff

Re: Residential Infill Project – Discussion Draft

Dear Mr. Tracy,

We are writing to request some modifications to the Residential Infill Project Discussion Draft to make the “alternative housing options” (e.g. corner plexes, mid-block duplexes, cottage clusters) work for a wider range of for-profit and non-profit builders.

These housing types are ideal for first time homebuyers, and the Discussion Draft does a good job of ensuring that they’ll fit in well with existing neighborhoods. But they’ll only get built if Portland’s homebuilders can actually use these provisions. A few changes are in order for this to happen.

As currently proposed, RIP provisions for “alternative housing” do not support fee simple ownership models. This is a major obstacle, since builders, buyers and lenders all prefer fee simple ownership.

It’s true that some builders have reluctantly started using condominium ownership as an end run to Portland’s unwieldy and time-consuming subdivision processes. Even so, it’s unlikely that for-sale versions of these alternative housing types will get much traction if condominium is the only possible option.

Fortunately, code language to provide fee simple options has already been written. Portland’s existing “corner duplex” code allows builders to insert property lines to create attached homes. This language can readily be adapted to other “alternative housing” situations, as summarized in the attached document. Such changes should not require any modifications to the subdivision chapters of Title 33.

To develop cottage clusters, as the Discussion Draft is written, a builder must be willing and able to navigate both a planned development land use process and condominium ownership. This is technically possible and might occasionally happen. But there are good reasons why most cottage clusters or “pocket neighborhoods” developed elsewhere in the US are legally subdivisions, with lots owned fee simple by residents. To adopt a cottage code that bars this option would be quite short-sighted.

It’s beyond the scope of the Residential Infill Project to reform Portland’s subdivision process. But that’s no reason to give up on the notion of allowing small homes on their own small lots. In fact, this is *exactly* the kind of housing we should be supporting to meet the demands of moderate-income homebuyers who have been largely shut out from the current new home market.

Thank you for your consideration,

Eli Spevak, Orange Splot LLC  
Peg Malloy, Portland Housing Center  
Diane Linn, Proud Ground  
Steve Messinetti, Habitat for Humanity  
Portland/Metro East  
Paul DeVecchio, Ethos Development  
Ethan Beck, Ethan Beck Homes

Travis Phillips, PCRI  
Sean Heyworth and Mike Mitchoff, Portland  
Houseworks LLC  
Vic Remmers, Everett Custom Homes  
Douglas MacLeod, Blue Sky Property Northwest  
Ben Shook, 2BPS Construction

## Attached Home Land Division Option

**For corner plexes and mid-block duplexes, allow attached homes (on their own lots) subject to the following lot size constraints:**

- In the R5 – R20 zones, lots must meet the minimum lot dimension standards stated in Chapter 33.611, Lots in the R2.5 Zone.
- In the R2.5 zone, there are no minimum lot dimension standards for the new lots.

*Commentary: This mimics the way corner duplex lots are treated under existing code (33.110.240.E.3.)*

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## Cottage Clusters

**Provide two paths for cottage cluster development:**

**(1) Mix of primary homes and accessory dwelling units through a PD process:**

- Allow an internal and detached ADU in the “a” overlay or a single ADU (internal or detached) outside the “a” overlay.

*Commentary: This mirrors what would be allowed on fee simple lots through a subdivision process and is similar to the current Discussion Draft proposal. It levels the playing field between what would be allowed on subdivided lots and what would be allowed through a planned development.*

- At least 50% of homes must face onto common landscaped open space that includes at least 400 square feet of grassy area, play area, or dedicated gardening space, which must be at least 15 feet wide at its narrowest dimension.

*Commentary: The Discussion Draft proposes this language for all PDs with detached homes. This language makes sense for cottage clusters, but not necessarily for other PDs with detached homes. Dimensional requirements are borrowed from Portland’s existing rules for common greens.*

- Cap building coverage at the greater of Table 110-4 or 35% of site area.

*Commentary: Building coverage requirement for single dwelling zones are designed for situations of 1 home per lot, so typically need to be adjusted to work for more than 1 home on a larger lot. Applying a standard building coverage based on lot size to address this issue is a common feature of cottage cluster codes (Bend allows 50% for 6,000sf or smaller lots; 35% for 6,000sf+ lots; Grants Pass allows 35% for cottage clusters regardless of lot size). Capping building coverage based on the greater of Table 110-4 or 35% of site area uses the existing table to deal with smaller lots*

*(where higher coverage percentages are appropriate) and the 35% cap for larger sites.*

- Review through a Type IIx PD process.

*Commentary: Matches Discussion Draft proposal*

## **(2) More traditional cottage cluster option:**

- Allow double the base zone density, subject to homes no larger than 1,200sf.

*Commentary: This size cap is large enough for a modest 3-BR home, yet is less than half the size of an average new home in Portland. Using this provision would yield less building mass than would typically get developed in a non-cottage cluster project. Also, 1,200sf was established as a square footage transition point for PBOT SDCs based on an expectation that this would be a natural demarcation point in the RIP.*

- Max height: 25'

*Commentary: Traditionally, cottages fall in scale somewhere between ADUs and single family homes. Detached ADUs are capped at 20' in height; single family homes are capped at 30'. Capping height at 25' is mid-way between, effectively limiting cottages to 2 stories. This is the height limit found in Sisters', Bend's, and Langley's cottage cluster codes.*

- Base code provisions apply for setbacks, property line fencing, FAR, off-street parking. Building coverage capped at greater of Table 110-4 or 35%.

*Commentary: To ensure size, massing and privacy impacts on adjoining properties are no greater than would be allowed by other by-right development, cottage clusters should have to meet these standard base code provisions. Exceptions to standard provisions (such as 0' setbacks to alleys, parking waivers near transit; front yard setbacks where adjoining properties have 10' setbacks...) would also apply to cottage clusters. See prior comment re: building coverage cap.*

- Exempt 1 pre-existing home (built before \_\_\_) per cottage cluster from the 1,200sf size cap and 25' height limit, so long as the entire cluster complies with the FAR limit and other requirements of the zone and of this title.

*Commentary: If an existing home is larger than 1,200sf and/or taller than 25', this should not disqualify the property on which it sits from being used for a cottage cluster development, so long as the home gets preserved.*

- Max. homes per cluster: 16

*Commentary: Some cottage cluster codes cap the number of homes in a cluster (e.g. 12 in White Salmon; 14 in Sisters, OR) and some don't cap the number at all (e.g. Bend). Portland's zoning code already caps the number of homes around a common court at 16. This seems like a reasonable number to use for a cap on homes in a cottage cluster.*

- At least 50% of homes must face onto common landscaped open space (which could be a common green or within a shared court) that includes at least 400 square feet of grassy area, play area, or dedicated gardening space, which must be at least 15 feet wide at its narrowest dimension.

*Commentary: The Discussion Draft proposes this language for all PDs with detached homes. This language makes sense for cottage clusters, but not necessarily other PDs with detached homes. Portland's dimensional requirements for common greens would apply, even in a planned development where no common green is technically created.*

- Accessory dwelling units shall not be permitted in cottage cluster developments

*Commentary: A cottage cluster code is an alternative way of building more, smaller homes on a property. Adding ADUs would effectively 'double dip' on two types of density bonus. Bend's cottage cluster code has an ADU prohibition, presumably based on this same logic. Portland's current corner duplex provision similarly disallows ADUs.*

- Allow cottage clusters to include 1 and/or 2-unit buildings

*Commentary: Integrating duplexes or 2-unit attached townhomes into a cottage cluster development facilitates the creation of more substantial open areas by decreasing the amount of land dedicated to side yards between homes. Neighbors would not be negatively impacted, since the largest possible 2-unit building in a cottage cluster would be 2,400sf and capped at 25' in height, which is less massive and shorter than typical new single family homes allowed by right.*

- A "common house" detached, covered, accessory structure in a cottage cluster containing shared kitchen facilities and guest bedroom(s) would be permitted so long as it falls within overall FAR, height, setback and building coverage limits for the site. Such a building would not count towards the maximum allowed density so long as a covenant is recorded against the property stating that the structure is not a legal dwelling unit and will not be used as a primary dwelling.

*Commentary: Under current regulations, a 'common house' with kitchen and sleeping facilities is treated as a dwelling unit. This means the builder pays SDCs for the structure and it counts against maximum allowed density for the site. These costs significantly decrease the likelihood that such shared amenities will ever get built. An alternative approach is to treat such a structure as a commercial structure. But this has its own complications & added expenses – since building code would treat it as a mixed occupancy structure and hence trigger full NFPA-13 sprinkling and associated*

*2" water service with accompanying quarterly fees in perpetuity. Covenanting the property could be a way to allow common houses without burdening them with these additional costs/regulations.*

- Don't layer on additional restrictions often associated with cottage cluster codes that rarely, if ever, get used (e.g. min. covered porch areas, design restrictions, fences, ...)

*Commentary: Many cottage cluster codes have rarely, if ever, been used. This is reminiscent of ADU codes from around the country with low utilization rates. Over-regulation may be a driving cause in both instances. In cities where regulations have been trimmed back on ADUs, numbers have typically increased. Given the public policy benefits of cottage cluster housing, it makes sense to reduce regulations so they are more likely to get developed as an alternate to traditional single family homes (which would be larger and more expensive). Any design restrictions (e.g. historic design, community design standards, street window glazing requirements...) that would apply to single family homes would also apply to cottage cluster homes. But additional design requirements specific to cottage cluster homes should be avoided.*

**(Version 2a) Single lot cottage cluster through a Planned Development:**

- Type Ix PD process for:
  - Lots less than or equal to 15,000sf;
  - Preserves an existing home; and
  - Doesn't take advantage of the density bonus portion of the cottage cluster code.

*Commentary: Make the land use process as easy as possible for someone who is preserving an existing home on a relatively small lot and not using the density bonus provision.*

- Type II PD process for all other situations

**(Version 2b) Subdivision cottage cluster:**

- For cottage cluster homes in R5 – R20 zones, lots must meet the minimum lot dimension standards stated in Chapter 33.611, Lots in the R2.5 Zone.
- For cottage cluster homes in the R2.5 zone, there are no minimum lot dimension standards for the new lots.

*Commentary: This mimics the way corner duplex lots are treated under existing code (33.110.240.E.3.). Cottage cluster homes on separate lots could be attached (up to 2) or detached.*

- Type Ix, IIx or III procedure based on thresholds applicable to subdivisions or partitions of the same number of lots.
- Compatible with Common Greens or Shared Courts (see 33.654)

November 30, 2017

City of Portland  
Bureau of Planning and Sustainability  
1900 SW 4<sup>th</sup> Avenue, Suite 7100  
Portland, OR 97201

RE: Residential Infill Project Discussion Draft

The HBA of Metro Portland (HBA) appreciates the opportunity to provide written comments on the Residential Infill Project (RIP) Discussion Draft currently in its public comment phase.

As you are aware, several HBA members served on the Stakeholder Advisory Committee and were supportive of the general concepts and recommendations from last year. Recognizing the significance of the undertaking and strong, diverse coalition of stakeholders that partnered on the issue, the initial proposal was an important step forward to better ensure expanded access to housing opportunities in Portland.

Moreover, there was a clear consensus and direction provided by the committee to address housing affordability head-on, by creating more housing opportunities and options throughout the city. To achieve this aim, affordable infill development requires a few key elements to become reality: Available land; clear, yet flexible guidelines to account for the irregularity of infill lots; and a timely and predictable regulatory process.

And while there are good aspects of the draft, the current proposal falls short on key elements – in particular dramatically reducing the amount of buildable land and thus creating additional hurdles for more affordable and attainable ownership opportunities.

The following are a few considerations that can improve the discussion draft and help further the shared goal of increased housing opportunity and affordability for all of Portland:

- **Housing Opportunity.** As noted last year, the HBA supports the creation of a Housing Opportunity Overlay Zone to expand access to more affordable housing options. That said, we must provide and ensure that the opportunity is one that can be realized by all Portlanders and should be expanded to encompass all of the city's neighborhoods.
- **Narrow Lot /PLA restrictions eliminate developable land.** With a scarcity of developable land in Portland, the proposal should make creating new, buildable lots a top priority. Instead, it appears to eliminate development on the majority of narrow lots and lot remnants adjusted through a PLA. Larger vacant lots do not exist in Portland, so this policy will result in a tighter land supply that will drive up prices, encourage more demolitions, and result in more expensive housing. Affordable, first-time ownership opportunities need smaller lots to build on. As such, all available lots and lot remnants in the city should remain an option for development.
- **Maximize Affordable Options.** One of the stated goals of the RIP is *"to address the rising cost of housing and the lack of housing choice."* Eliminating narrow houses entirely, based largely on affluent NIMBY complaints, runs counter to this goal. So called "skinny homes"

represent one of the last affordable options left in Portland. Restricting this housing type to appease a small number of critics is demonstrably unfair to first-time homebuyers trying to purchase at the lower-end of the market. We must stand behind and further the equity objectives outlined in the Comprehensive Plan by maximizing, not restricting, affordable options like these throughout the city.

- **Ensure Certainty/Adaptability in the Process.** Developing narrow lots, while simultaneously increasing density and providing a diversity of housing types, requires a zoning code that can rise to this challenge. Infill lots by nature are oddly shaped and have challenges with topography, natural features and existing structures, etc. The RIP project was chartered to create more housing opportunities – in particular alternative, middle-housing options. However, a more technical read of the draft suggests the addition of several sets of overlapping restrictions may hinder this goal. Not only does the proposal lack the flexibility to make middle-housing options more of a reality, but it proposes limitations that may result in unrealized opportunities to achieve our objectives. In addition to housing opportunity, narrow lots and maximizing affordable options, there must be flexibility with FAR requirements to address the variety of single-family housing types in a manner in keeping with existing housing in our diverse neighborhoods. Portland enjoys a rich diversity of housing types, and that notion should be embraced in this proposal.

As we move forward and begin the difficult task of refining and creating a workable product for all of Portland, we would recommend that we take a step back and address a core problem facing the city and a paramount goal of the committee – housing affordability and ensuring more available, affordable options for our residents.

Unfortunately, the discussion draft appears to lack clarity of purpose and contains contradictory policies in purpose and implementation. We must revisit the thoughtful, balanced recommendations of the Committee and refine the draft proposal to provide more of what is needed to create affordable infill opportunities in Portland.

We are facing unprecedented growth as a city – a challenge that impacts us all. As such, we must take the time to ensure that any policy proposal is crafted in a manner to ensure we can help address the housing shortage (of all types) that is facing Portland.

The HBA values its relationship with the city and is a committed partner in this process to further housing affordability and choice for current and future residents. As the discussion draft contains numerous changes, attached is an appendix that addresses some elements more comprehensively. Thank you for your consideration of these items.

Respectfully,

Paul Grove  
Director of Government Affairs  
HBA of Metro Portland

## Appendix to Residential Infill Project Discussion Draft

### General Concerns

- The city requires an adequate, functional land supply to address housing affordability. In the midst of a housing emergency, this is the wrong time to reduce developable land and increase barriers toward the production of needed housing.
- The market requires speed and flexibility to address housing needs. We must ensure that the proposal reflects consumer and market realities, as well as provides for an implementation process that does not stall and unduly slow development with increased costs to housing.
- The proposal needs a thought out effective date established before implementation. This allows consideration of the cumulative impact of interplay with other policies that already constrain development such as storm water management, right-of-way dedications, etc.

### Specific Concerns

#### **Eliminating Narrow Lot Opportunities:**

- From the draft, it appears as if developable lots are gained by rezoning some narrow lots from R5 to R2.5. However, the reality is that over 7,000 affordable, buildable lots will be lost by eliminating the development of 25-foot wide platted lots in the R5 zone.
- Reducing the supply of buildable lots is bad policy in a market where land costs are already inflated due to limited supply. We need to maximize the land available to reduce housing costs and further address housing affordability.
- Historically platted lots are recognized by the State (ORS 92.017), so allowing these lots to be confirmed but not developed creates a lack of clarity in the code for all parties.
- The draft proposal allows half the narrow lots (those zoned R2.5) to still be developed, while prohibiting development on those same lots in the R5 zones. So the intended benefit of the change, as stated in the draft of correcting the fact that **“the underlying platting does not match the zone,”** is not being improved by this proposal.

**Recommendation:** Remove the restrictions on narrow lot development from the proposal. Keep “skinny homes” as a viable, affordable housing option.

#### **Attached Homes on Narrow Lots/Affordability & Consumer Preference:**

- This current proposal to eliminate skinny homes by requiring attached housing represents an outcome that is neither vetted nor favored by the public.
- “Skinny homes” are one of the last viable, affordable options for the City of Portland – especially for less affluent, first-time homebuyers. To eliminate this housing type runs counter to the city’s equity objectives in the Comprehensive Plan and must be preserved.
- As the market has shown, attached homes are a type that neither buyers nor neighbors have favored. Often, attached housing is synonymous with apartments. From a buyer’s perspective, the shared wall is their biggest complaint about apartment living and a driving factor for buying a home.

- Attached housing does not result in tangible benefits such as more on-street parking, more density or future density. But they do create design problems with larger building mass and a lack of separation and light that are not easily addressed.
- Common elements of attached homes (shared roofs, walls, foundation, etc.) create hurdles for buyers and developers in a tightened financing market that has a long-standing bias for single-dwelling detached houses. Necessary requirements like an HOA, maintenance agreements, and special insurance coverage make underwriting and financing complicated and may serve to limit opportunities that impact this aspect of the housing market.

**Recommendation:** Allow attached houses as an *option* on narrow lots, but do not make it a requirement.

### **Property Line Adjustments Changes**

- The summary proposal does not address the proposed changes to the Property Line Adjustment rules, limiting the creation of a buildable property from a lot, lot of record, or lot remnants. This arcane code regulation can't easily be summarized, but it represents a significant change to find and develop these historic, legally created lots by adjusting them in an economically feasible and timely manner.
- The result of this change is to disallow property line adjustments that could make a narrow lot a buildable lot. However, there is no consideration of what this change means citywide when applied to lots of varying sizes, historic platting and zones beyond the R5. This idea needs to be analyzed and vetted before the impacts can be assessed.
- PLA's are commonly used with narrow lots on corners to pivot the property line 90 degrees. The result is typically two 50-foot wide lots, with 2,500 square feet of area. This compatible and affordable infill opportunity will now be prohibited. At a minimum, this proposal should exempt corner lots.
- Throughout the city, the PLA process is a tool for making oddly-shaped, forgotten and leftover property into developable lots. From an infill standpoint, PLA's are ideal for quickly and economically creating buildable lots in the middle of existing developed neighborhoods. Creating limits and constraints on this tool at a time when land is both scarce and expensive is the wrong policy.
- Lastly, PLA's are regularly used to move existing lot lines in order to preserve houses.

**Recommendation:** Eliminate restriction on Property Line Adjustments and look for more opportunities to maximize available buildable land through PLAs, particularly when an existing house is to be preserved.

### **Expanding the new 'a'-overlay**

- We applaud the idea of revising the 'a'-overlay regulations to allow more infill opportunities.
- However, limiting opportunities in outer-east Portland will continue the area's history of being under-served and under-represented by city government. Increasing individual investment in the area and adding more population is what's necessary to attract the services that will make this area thrive.
- We should look to include the area east of 82<sup>nd</sup> Avenue, especially when looking 25 years into the future. Additionally, the 2035 Plan already downzoned much of the multi-family zoning in this area (R1 and R2) to single-family zoning so there is already a drop in density going into effect.

- With “visitability” a trade-off for additional units in the a-overlay, provisions should also include an increase in FAR and building coverage allowance. For a residential unit to be ADA accessible, it must have wider hallways, a bigger bathroom (that can fit a 5’ circumference circle), which cannot be accommodated by building a second floor.

**Recommendation:** Apply the a-overlay to all of Portland and encourage “visitability” through an increase in FAR.

### **Garages for Narrow Lots**

- The city has long tinkered with rules for attached garages on narrow houses by limiting: the percentage of façade dedicated to the garage, the width of the garage door, the garage setback, the length of the driveway, etc. Yet, the garage is still highly desired.
- This proposal will add more restrictions to attached garages, including façade articulation, minimum 60% front yard landscaping, required foundation plantings and “tuck-under” requirements. These design-based regulations are difficult to implement and meet.
- Tuck-under garages cost considerably more, since most entry-level houses are not constructed with basements. The added costs of site excavation, taller foundation walls, and slab (versus post and beam) construction will ultimately be passed to the buyer.
- In addition, the benefit of a tuck-under garage is nominal since a standard 18-foot long driveway only allows for a two to three foot elevation drop to make the grading work. The image in the summary proposal over-emphasizes the benefits of a tuck-under garage by showing a lot with nearly four feet of additional elevation gain above street level – a rarity in most of Portland.
- Transportation in Portland is still largely car-based. When transportation patterns realize a greater shift from vehicles, then attached garages will offer an infill opportunity. To that end, we should work to create zoning and building code incentives that help homeowners convert their garages to ADUs and “visitable” housing units when the market no longer demands that houses come with garages.

**Recommendation:** Look for opportunities to turn existing garages into future housing opportunities, while appropriately planning for market realities.

### **Increasing Front Setbacks in R2.5 and R5**

- Increasing setbacks to 15 feet in the R2.5 and R5 zones promotes 100-year old development patterns, while turning a blind eye to modern development constraints. New infill developments are already limited by on-site storm water management, right-of-way dedications, etc. As such, there should be more flexibility in house placement to meet these often-conflicting regulations.
- A key to future infill development is having enough area “left over” for a viable building footprint in the future. If the undeveloped land must be split between the front and back yards to meet the increased setback requirement, no area will be left for the development of additional units in the future, creating a lost opportunity and exacerbating an already tenuous situation.
- In the midst of a housing crisis, we must strive for the highest and best use of our limited land supply.

**Recommendation:** Recognize and acknowledge the challenges facing the city and embrace modern infill development and goals by eliminating the increased setback proposal and consider ways to preserve future opportunities on developed lots.

#### **Floor Area Ratio for Single-Family Zones**

- In commercial zones, FAR works well to regulate building size because most of the sites are flat and the building is relatively “boxy.” Applying this same standard to single-family homes presents implementation problems, as sites become more complex and building shapes more unique, and requires additional flexibility.
- The table in the discussion draft shows that in 2015 the average house size in R5 was 2,669 sf, with a maximum of 6,700 sf. At present, the proposed maximum FAR for a 5,000 sf lots would be 2,500 sf. In addition to the administrative challenges, both the Johnson Economics report and Oregonian op-ed noted that this could result in fewer units being built. As such, we should not establish an artificial cap that limits the overall supply of housing.
- A key goal of the RIP is to encourage “middle housing” by eliminating hurdles for duplexes and triplexes. However, making the maximum FAR overly constrictive will work counter to this goal. By not having appropriate FAR to accommodate multiple units on tight infill sites, the restriction ends up becoming a disincentive to build anything other housing types.
- In addition to the proposal’s language to not count tuck-under garages in FAR calculations, attached garages should be similarly excluded. They do not typically constitute living space and each style has its own unique advantages. City policy should limit architectural determinations and steer clear of subjective, stylistic decision-making.

**Recommendation:** Provide flexibility with the maximum FAR thresholds. Examine and establish a workable FAR cap that discourages the very largest of houses, while increasing and allowing for additional FAR flexibility to make infill and middle housing a truly viable option. An additional consideration would be to examine a minimum FAR by right, per zone to not unduly punish smaller lots.

Business interests



Portland Bureau of Planning & Sustainability  
1900 SW 4th Ave, Suite 701  
Portland, OR 97204  
Attn: Residential Infill Project staff

November 30, 2017

Dear BPS Residential Infill Project Team,

We write today to provide feedback on the Residential Infill Project Discussion Draft. We want to thank you for taking the lead in the country in re-examining the appropriateness of current single family zoning regulations given contemporary issues of population rise, equitable housing opportunity, and carbon emissions. We write as a leading Portland-based design-build firm that has designed and built hundreds of new construction and renovation housing projects in the City over the last 15 years. These include work primarily in single-family zones and also two prominent courtyard housing developments. Our mission is centered on sustainability, and Portland's 2015 Climate Action Plan and the work of rapidly reducing carbon emissions is very important to us.

Generally we feel the RIP Draft is on the right track but see particular ways it could be dramatically improved. We feel the two most important issues to be addressed through RIP are (1) the demographic mismatch between the very large homes currently being built compared to very small typical household sizes, and (2) reducing carbon emissions should be given more priority consideration. Because of the significant amount of single-family land area in the City, and the significant period of time (decades) between major single family zoning code updates, the outcomes of RIP will have tremendous impact on the City's carbon footprint due to both transportation and building operational energy use.

Additionally, we feel that for far too long, single family zoning has manipulated housing supply in this country promulgating socio-economic segregation that has resulted in sharp contrasts in school district funding, reduced opportunities for many segments of the population, and deepening social divisions. We should bear this in mind when considering NIMBY reactions against progress in these neglected areas. There are many voices that are not currently at the table because they haven't been allowed an opportunity to live in our single family neighborhoods for many decades.

In general, we support the proposals of Portland for Everyone which call for more housing abundance and diversity. Loosening single family regulations to allow more supply to meet growing demand will inevitably keep all housing prices more affordable than otherwise. It should also allow more "missing middle" housing types, re-legalizing the strong housing diversity that still exists in our much loved, and highly walkable historic streetcar neighborhoods. Allowing more and diverse types of infill housing will generate more smaller housing unit sizes, which are inherently more affordable and energy efficient than the large status quo single family homes most often built today. Housing abundance and diversity should be supported to a minimum of 20 households/net-acre in order to

promote walkability, transportation choice, and thriving neighborhood business districts. And we should be clear that density should drive frequent-service transit. We should not wait for the latter.

In short, supporting housing abundance and diversity has deep implications for:

- Increasing housing opportunity and affordability by putting more and smaller housing types on the market.
- Decreasing per capita carbon emissions by reducing automobile dependence and reducing housing energy demand due to smaller-sized housing.

Below are a few specific concerns we have with the proposed RIP Draft:

1. The (a) overlay should be discarded. The opportunity for housing abundance and diversity should be given to every property owner by right. Omitting areas threatened with displacement robs owners there the opportunity to create more, smaller housing, which will in turn rob renters of that rental opportunity. If equity is the intention, limiting housing choice to the (a) overlay zone does not clearly serve this purpose, but rather it is at risk of doing just the opposite. The City should not presume to be able to coerce the market to avoid displacement through such zoning. For example, ADU developers have already started business in the City and could be of service in providing ADU's to low-income homeowners to allow them to increase the value of their property in a way that increases supply to the rental housing market, without necessarily displacing current renters.
2. Walkable housing density (min 20 Hh/net-acre) should be allowed by zoning Citywide, regardless of current frequent mass transit access. This would dramatically reduce Portland's carbon footprint over the coming decades and is imperative if we're to meet goals of the 2015 Climate Action Plan.
3. Regarding internal conversions of existing homes, given our experience with both the residential and commercial building codes, we feel that up to 4 dwelling units should be allowed (rather than 3) to help offset the significant cost barrier when triggering commercial building code by creating more than 2 units.
4. A true cottage cluster code option should be proposed. Relying on the PUD process is an expensive approach with uncertain guidelines for approval. Not allowing an increase in the number of dwelling units within the same FAR that would be allowed of a typical single-family development is a significant missed opportunity. Codifying a few basic prescriptive elements allowing cottage clusters on any residential lot of sufficient size (or adjoining lots) would significantly increase the number of developers willing to revisit this important "missing middle" housing typology. Without such provisions RIP is not adequately responding to the significant market demand for cottage cluster housing, and we will continue to see a lack of such policy stifle developers and owner-builders from meeting this demand. Considering the alignment of cottage clusters with neighborhood support, walkability, and energy efficiency this would be a significant missed opportunity for years to come. We are happy to discuss this further.
5. Providing just one affordable unit should trigger a density bonus, if the unit is two bedrooms or more. This will result in more mixed income developments, more profit/non-profit partnerships and many more family-sized affordable units city wide. From our experience and in discussions with colleagues with affordable housing expertise, we don't feel this density bonus will be substantially utilized if all units on a site are required to be affordable. Further, family-sized affordable units are a particular challenge in the City and this could be a valuable way to remedy that problem.
6. We support the use of the FAR metric, however as commonly measured it creates a significant disincentive to build well-insulated walls and roofs (anything more bulky than energy code minimum requirements). In order to ensure the FAR restriction does not impede

the goals of the energy code and the Portland Climate Action Plan exceptions need to be made to encourage higher performing buildings. A simple and critical way ensure this which has been proven in other jurisdictions such as Vancouver B.C. is to measure FAR with a standardized, theoretical "code minimum" wall thickness and roof truss heel height.

Thank you for considering this feedback. We look forward to seeing the City of Portland continue its track record of progressive, thoughtful civic responsibility by better aligning residential zoning regulations with the interests of a wider demographic of current and future Portlanders.

Sincerely,

Stephen Aiguier  
Erica Dunn  
Mike Liggett  
Maise Schreiber  
Corey Cliff  
Mike Beamer  
Maggie McGann  
Dylan Lamar  
Laura Squillace


City of Portland Bureau of Planning and Sustainability  
Attn: Residential Infill Project  
1900 SW 4th Avenue, Suite 7100  
Portland, OR 97201

*November 30th, 2017*

Dear Portland city planners,  
Business for a Better Portland is Portland's newest and fastest-growing business organization, representing nearly 200 local businesses. Our members believe that when Portland thrives, our businesses thrive. No issue has made that connection more clearly than our housing affordability crisis.

**“ It's difficult to find qualified production workers for our Interstate Avenue clean-tech factory. Rapidly increasing rents are pushing people to Portland's outskirts, making it a challenge to sustain entry level jobs in the urban core.  
Sam Pardue, CEO of Indow Windows**

Portland faces a growing gap in our housing options. There's plenty of new housing at the high end of the market, and while we still have work to do, we have made significant progress in providing affordable housing for those making 60% or less of Median Family Income. However, Portland's housing is becoming increasingly unaffordable for those making 80, 100 or even 120% of MFI. Our workforce is being driven farther and farther from our business centers, forcing people into longer commutes and increased auto dependence.

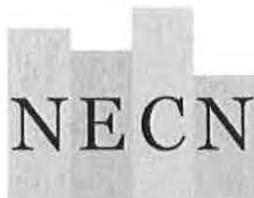
This gap also manifests itself in the types of housing we're building. Thanks to a booming construction market, we've added a significant amount of new medium and high density apartment housing. Rents in that segment of the market have even begun to level off. However, housing in our lower-density zones – which covers much of inner Portland's land area – continues to climb in price. Our walkable neighborhoods and tree-lined residential streets are becoming off-limits to all but the most affluent workers and families.

We support the goal of the Residential Infill Project to fill the gaps in Portland's housing types and costs. In particular, we welcome changes that will incentivize the creation of affordable, unsubsidized workforce housing in our walkable, bikeable and transit-served neighborhoods. The current incentive of one bonus unit when 100% of units are affordable at 80% MFI may be insufficient. We encourage BPS to work with developers to identify incentives that will result in the largest number of affordable units being built.

Lastly, we ask BPS to consider the social and economic cost of failing to meet this goal. We must not place politics above prosperity. We must act boldly and act now to ensure that Portland continues to be a great place for all to live and do business.

Sincerely,  
William Henderson  
Board of Directors  
Business for a Better Portland

Neighborhood associations & district  
coalitions



NORTHEAST COALITION  
OF NEIGHBORHOODS

November 21, 2017

Katherine Schultz, Chair  
Portland Planning and Sustainability Commission

CC: Morgan Tracy; Julia Gisler

**RE: NECN Response to Residential Infill Discussion Draft**

Madam Chair,

The Northeast Coalition of Neighborhoods (NECN) appreciates the opportunity to comment on the Residential Infill Discussion Draft. NECN commends BPS staff on their effort both conducting an extensive public process and crafting a proposal to help address the housing crisis in Portland. We offer the following recommendations:

**Scale of Houses**

1. Limit the size of houses while maintaining flexibility
  - ***NECN recommend increasing the FAR and/or the FAR unit bonus for lots with three or more units in order to promote the development of more dwelling units***
  
3. Improve front setbacks to better reflect those of adjacent houses
  - ***NECN recommend keeping R5 and R2.5 setbacks at 10 feet to allow more flexibility for siting of structures and the creation of private rear yards***
  
4. Improve building design
  - ***NECN support the change allowing eaves to extend 2 feet into the setback***

**Housing Opportunity**

5. Create a new Additional Housing Opportunity overlay zone -- the new 'a' overlay zone
  - ***NECN recommends removing the "visitability" requirements, as they will increase the cost of additional housing, decreasing the number of units built***

[www.necoalition.org](http://www.necoalition.org)

Alameda • Boise • Eliot • Humboldt • Irvington • King • Sabin • Sullivan's Gulch • Vernon • Woodlawn  
At King Neighborhood Facility, 4815 NE 7<sup>th</sup> Avenue, Portland, OR 97211. 503-823-4575 main, 503-823-3150 fax, [info@necoalition.org](mailto:info@necoalition.org)

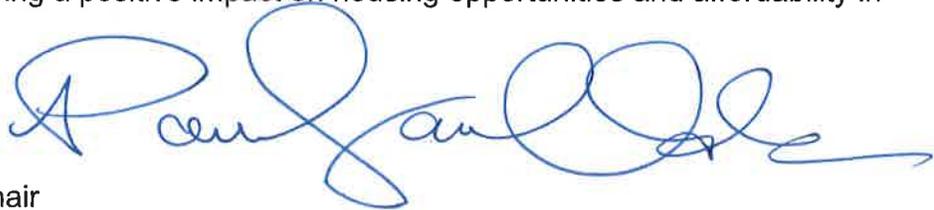
6. Apply the new 'a' overlay zone in select areas
  - **NECN recommends adding the areas removed for equity concerns to the new "a" overlay zone to allow low-income homeowners the opportunity to receive additional income through construction and sale or rental of additional units.**
  - **NECN recommends adding areas to the new "a" overlay zone within a 1/2 mile of planned high capacity transit, specifically the Division Transit Project and Southwest Corridor, to increase the number of residents who can benefit from transit investments**
7. Provide incentives for affordable housing and historic preservation
  - **NECN supports allowing one bonus unit if at least one unit is affordable to encourage creation of more affordable units**
8. Encourage more cottage cluster development
  - **NECN supports proposed changes to promote cottage cluster development**

#### **Narrow Lots**

9. Rezone some R5 historically narrow lots to R2.5
  - **NECN supports rezoning some R5 historically narrow lots to R2.5**
10. Make citywide improvements to all narrow lots
  - **NECN supports proposed citywide improvements to all narrow lot development**

NECN looks forward to continuing to work with BPS, the PSC, and City Council as the Residential Infill Project continues to be refined. We look forward to the updated residential code having a positive impact on housing opportunities and affordability in the City.

Regards,



Paul Van Orden, Chair  
Northeast Coalition of Neighborhoods



## Southwest Neighborhoods, Inc.

7688 SW Capitol Highway, Portland, OR 97219 (503) 823-4592

[www.swni.org](http://www.swni.org)

November 30<sup>th</sup> 2017

Morgan Tracy  
Project Manager  
Residential Infill Project  
[Morgan.Tracy@portlandoregon.gov](mailto:Morgan.Tracy@portlandoregon.gov)

Re: SWNI Comments on Residential Infill, Discussion Draft

At its November 15, 2017, meeting the Board of Directors of Southwest Neighborhoods, Inc (SWNI), representing 17 neighborhood and three business associations in SW Portland, approved a motion at the request of the SWNI Land Use Committee to write a letter to the Bureau of Planning and Sustainability stating the Board opposes the Residential Infill Project (RIP) Additional Housing Opportunity Overlay Zone (A Overlay).

The rationale for this position includes the following points:

The RIP ignores the available buildable inventory under the current code. For example, BPS acknowledges that 3.5% or fewer corner lots have developed into R2.5 attached (duplex) in the A overlay.

The Rip allows three unaffordable units or four affordable units on almost all properties in the A Overlay.

The RIP fails to insure housing affordability and likely will result in continued demolitions, displacement and an increase in investor ownership of the city.

The RIP proposes to destroy single-family neighborhoods, which are clearly desired by a large portion of the population.

The RIP fails to consider infrastructure that is needed to support the proposed spread of density.

The RIP is based on the false assumption that car transportation will diminish.

The RIP fails to require sufficient off-street parking resulting in street congestion and decrease in walking safety particularly in areas where there are no sidewalks.

The RIP is a one-size-fits-all approach to accommodating increased growth in Portland but provides no alternatives for achieving the goals, which allegedly guide the project.

A prompt response to this request will be greatly appreciated.

Sincerely,

John Gibbon  
President, Southwest Neighborhoods Inc.

Cc: Susan Anderson, BPS Director



## Beaumont-Wilshire Neighborhood Association

% The Postal Station, 2000 NE 42nd Avenue, Suite D #394, Portland, OR 97213-1397

November 22, 2017

City of Portland Bureau of Planning and Sustainability

Attn: Residential Infill Project

1900 SW Fourth Avenue, Suite 7100

Portland, OR 97201

[residential.infill@portlandoregon.gov](mailto:residential.infill@portlandoregon.gov)

Re: Comments on Residential Infill Project October 2017 Discussion Draft

The Beaumont-Wilshire Neighborhood Association (BWNA) appreciates the opportunity to comment on the October 2017 Residential Infill Project Discussion Draft. BWNA has an interest in keeping our neighborhood available to as many diverse people of varied incomes as possible. This goal is at risk given the many demolitions of viable single-family homes that have been replaced by larger, much more expensive houses. Our neighborhood has been closely following the Residential Infill Project. The following comments were approved by the Board of Directors at the BWNA November 13, 2017 meeting.

The Residential Infill Project as currently proposed would effectively re-zone nearly two-thirds of Portland's neighborhoods now zoned for single-family dwellings with the goal of increasing density and housing options in order to accommodate an estimated 123,000 new households in the City of Portland by 2035. According to the Discussion Draft, approximately 20 percent of these new households are anticipated to be housed within the city's single-dwelling neighborhoods. The Discussion Draft, on page 13, indicates that there are 116,975 existing homes within the R2.5, R5, and R7 zones, and, on page 42, indicates that 86,766 lots with this zoning will be included in the proposed overlay.

Using the above data, roughly 25 percent of existing homes in single-family neighborhoods could be impacted by this increased density through demolition and reconstruction, accessory dwelling unit development, or partition of the existing home to multiple dwelling units in just the next 18 years. The increased density is likely to further increase traffic on main arterials as well as on side streets as existing arterials reach capacity and suffer further congestion. Given the potential scope of these impacts, there has been very little analysis regarding the consequences to neighborhoods resulting from the proposed zoning changes of the Residential Infill Project.

**The Proposed Residential Infill Project Overlay is Unlikely to Improve Housing Affordability and Likely to Exacerbate Demolitions of Lower-Priced Homes.** Given the economics of demolitions within Northeast Portland, the proposed changes are unlikely to increase housing affordability. The current reality in the Beaumont-Wilshire neighborhood is that a single-family home on a corner lot will sell for \$500,000 or more and be replaced by a duplex in which each unit retails for \$680,000 to \$1,000,000. While causing more density, the RIP proposal will result

in significantly increased housing costs. The neighborhood will become further out of reach to younger families and those of lesser means. While under current zoning only corner lots can be redeveloped into duplexes, the extension of the proposed zoning overlay to every lot will exacerbate the demolition of existing viable homes in favor of larger houses and duplexes, while corner lots become triplexes.

To reiterate, the changes proposed by the Residential Infill Project will likely result in an increase in demolitions of smaller, affordable homes and their replacement with larger houses, duplexes or triplexes – each unit of which is likely to be much more expensive than the home demolished. This appears to contradict the direction provided by the City Council to the Residential Infill Project in December 2016. This will also not further the goals of increasing housing affordability or providing alternative housing options that the Residential Infill Project is hoped to address. For these reasons, BWNA does not support the up zoning of existing R5 and R7 lots to duplexes, or triplexes on corner lots.

BWNA is also opposed to the proposed up zoning of R5 lots with underlying historic lot lines to R2.5, against the guidance of the City Council vote in December 2016. This unwise up zoning to double the density would result in more demolitions of viable, less expensive houses in neighborhoods that are now marginally affordable to first time home buyers. Before such an extreme zoning change is undertaken adequate analysis must be performed to provide more certainty that the results will truly enhance housing opportunities for lower-income residents. The areas planned for up zoning in Beaumont-Wilshire include many of our neighborhood's currently less expensive houses.

***The most affordable and greenest houses are the ones already standing, and additional pressure on these homes by the proposed zoning changes will increase demolitions. The demolition of these viable homes should be discouraged, and not encouraged by zoning changes.***

**The Proposed Overlay Should be Piloted on a Smaller Scale to Better Understand Impacts.**

Because the proposed zoning changes have the potential to create such extensive impacts to Portland's existing neighborhoods, more analysis of potential effects is necessary before the proposal is adopted. To this end, BWNA recommends that the proposed zoning changes should be further evaluated to assess the impacts. The proposed zoning changes to increase density should be scaled back and piloted in a more limited segment of Portland's neighborhoods so that an assessment of these impacts can be evaluated before the zoning of *nearly all of Portland's single family neighborhoods is altered*. This piloting should occur by directing the zoning changes, and thus increased density, more closely to existing infrastructure – corridors and frequent mass transit.

If the city does not see fit to do a pilot study, then the scale of the proposed overlay in all affected neighborhoods should be significantly reduced and limited to areas that are closer to existing corridors of frequent transit, services, and commercial and retail zoning. Given the

many uncertainties in the outcomes and impacts of the Discussion Draft proposal, rather than unleash this new zoning across the entire proposed overlay it is more responsible to pilot the proposal, or otherwise limit its impact, until the costs and benefits can be better ascertained through rigorous evaluation.

**Accessory Dwelling Units (ADU) Should be Analyzed to Determine if They Will Increase Housing Options and Affordability.** The use of ADUs may provide small units for long-term rental or ownership and provide an opportunity to provide additional housing options and improved affordability without demolishing existing homes and rezoning nearly two-thirds of Portland's most affordable housing stocks. However, the city should further evaluate the Discussion Draft's apparent reliance on ADUs to solve the housing affordability crisis. It is not clear currently the proportion of ADUs that will be used for long-term rentals or ownership rather than Airbnb-type short-term rentals. To ensure that ADUs will be primarily used to provide the long-term housing that will most directly address affordability and create options for seniors and lower-income households we suggest the exploration of code that limits ADU use as short-term rentals for a limited amount of time following development.

**Infill Housing Scale, Height and Setback Requirements.** BWNA supports the proposals in the Discussion Draft to reduce the size and scale of infill housing to better match existing neighborhoods. However, the proposed floor area ratios (FAR) will still allow for large homes to be constructed in place of more affordable, smaller existing homes. The proposed FAR of 0.5 is significantly larger than the median house size in many east side neighborhoods, and therefore, will not result in more affordable housing options being constructed. Median house sizes in the Beaumont-Wilshire zip codes 97212 and 97213 are 2,028 square feet and 1,556 square feet, respectively. FAR limitations are an appropriate way to attempt to reduce the scale of infill houses. By not counting basement square footage in the FAR, houses significantly larger than 0.5 FAR can be built. However, BWNA recommends that basement square footage not be counted towards the allowable FAR only if the first floor is no higher than 2 feet above grade to reduce height impacts and create incentives for the construction of basements that more efficiently use the available space of the lot while reducing scale impacts. BWNA also recommends that smaller FAR ratios be considered to reduce incentives to demolish existing, smaller homes.

BWNA supports the proposal related to measuring height from the lowest grade five feet from the house. Stringent code and enforcement must be implemented to prevent artificially raising grade to achieve greater house height. The proposed height limit is also higher than the current median in east side neighborhoods and should be measured to the peak of the roof, especially if dormers/gables are more than 50 percent of the roof area.

The Beaumont-Wilshire neighborhood has a number of streets in which the proposed front setback requirements – although expanded to 15 feet – would still allow infill housing to deviate from the established building line. This creates adverse impacts to livability and neighborhood character. BWNA recommends that setback requirements match the average

Beaumont-Wilshire Neighborhood Association Comments on October 2017 Residential Infill Project  
Discussion Draft  
November 22, 2017

setback of the adjacent homes, with potential deviations from this requirement subject to design review.

### **Cluster Housing**

Cluster housing is a concept that should be examined as a partial solution to housing affordability. Cluster housing projects should be defined by specific code regarding size, height, and orientation to the street. An undefined plan development review is not sufficient to limit size and height.

We appreciate the efforts of city staff, their consultants, and volunteers for their considerable work on this project and hope that our comments are helpful. We look forward to continuing the discussion of the future of housing in Portland with the Bureau of Planning and Sustainability, the Planning and Sustainability Commission, and City Council in 2018.

Sincerely,

A handwritten signature in black ink that reads "Tim Hemstreet". The signature is written in a cursive style with a large, sweeping initial "T".

Tim Hemstreet  
President, BWNA

COLLINS VIEW NEIGHBORHOOD ASSOCIATION

Elise deLisser, Chair  
0304 SW Riverside St.  
Portland, Oregon 97219

RECEIVED  
PLANNING & SUSTAINABILITY

2017 DEC -4 A 10:07

Nov. 20, 2017

City of Portland,  
Bureau of planning and Sustainability  
Attn: Residential Infill Project:  
1900 SW 4<sup>th</sup> Ave., Suite 7100  
Portland Oregon 97201

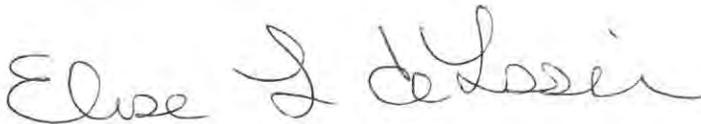
The following comments are limited to the Infill Project and, in particular, those parts of concern to Collins View.

Much of Collins View is not suitable for increased population density, whether in base dwelling units or accessory dwelling units, due to the nature of the area and the lack of infrastructure. Increasing density would increase the vehicular traffic in an area that is already seriously challenged.

Collins View and much of the surrounding part of Southwest Portland is made up of streets without sidewalks. Many streets are narrow with curves and hills and little space for on-street parking. Some are not paved or are only platted. The area is transportation challenged due to limited public transportation.

If population density is to be added through planned developments, the following mandatory criteria, similar to those in the 'a' overlay, should be required:

- The development must be on a city-maintained street with continuous sidewalks to a frequent transit line not over ¼ mile away.
- If grocery stores and other services are not within ¼ mile, one parking space must be provided for each living unit, including accessory dwelling units.
- All mature trees must be retained.



Elise deLisser  
Chair, on behalf of  
Collins View Neighborhood Association



Concordia Neighborhood Association  
P.O. Box 11194  
Portland, OR 97211  
landuse@concordiapdx.org

November 20th, 2017

City of Portland Bureau of Planning and Sustainability  
Attention: Residential Infill Project  
1900 SW 4th Avenue  
Suite 7100  
Portland, OR 97201

Morgan Tracy, Project Manager [residential.infill@portlandoregon.gov](mailto:residential.infill@portlandoregon.gov)

Dear Mr. Tracy,

As you know, the City is at a crossroads. Our single family residential zones contain homes that have ceased to become affordable to the average Portland family. Yet the current zoning prevents more units from being constructed on lots in these zones, which might act to bring down the cost per new housing unit. Instead, the entire site acquisition cost must be borne by a new single-family house. This results in more and more large, expensive homes that aren't affordable to most of the families who might be able to fully use their space, and generally are purchased by people of means who don't actually need all that space.

Supply, in short, is not meeting demand.

The decision point we find ourselves at is this:

Do we allow this situation to continue and worsen? Or, do we take effective steps to fix it?

After reviewing the latest staff proposal from the Residential Infill Project, we find that the current proposal does not plan to significantly improve the situation with regards to affordability.

No significant changes are proposed from the proposal that was analyzed by Johnson Economics in their October 17, 2016 memo to Tyler Bump of BPS.

In that memo, the RIP project was projected to actually result in a net reduction of housing units produced in Portland over the next two decades by 8,000 units over the baseline; hardly a ringing endorsement of the success of this proposal!

Further, that report indicated that it would be unlikely that any of the resulting units would be affordable to a household making the Median Family Income or less for the City of Portland.

It is our view, as neighbors who are concerned about the ability of our children, our aging parents, our friends and other potential new neighbors to afford to live near us in the future, that the Residential Infill Project is currently flawed, but that with a few simple fixes, it can be tuned to help deliver a more affordable future for our city.

In that spirit, we respectfully recommend the following changes to the staff proposal:

- **Alleys:** All houses abutting alleys, not just skinny houses, should be required to use the alley for automobile access to the lot. We care about protecting the pedestrian-oriented nature of our neighborhoods, and want to protect it.
- **'a' Overlay (the HOOZ):** The Housing Opportunity Overlay Zone (HOOZ), otherwise known as the new 'a' overlay, attempts to prevent gentrification and displacement by denying the opportunity to take advantage of the new RIP regulations to areas at risk of gentrification and displacement. As a neighborhood that experienced redlining during the 20th century based on the spatial distribution of people of a particular race, we do not wish to see any other neighborhoods be subject to a policy that effectively red-lines poor neighborhoods of the city, denying property owners there the opportunity to improve their lives and the neighborhood by replacing existing, sub-standard housing stock with newer development that could allow owners to lift themselves out of poverty by the bootstraps, following the American Dream. It's quite possible that preventing access to opportunity in this manner may be a violation of the Federal Fair Housing Act. The City should not seek to deny these sorts of economic opportunities to low-income areas. The 'a' overlay should be applied broadly to all residential zones across the city within walking distance of transit with 20 minute headways in the peak or better, and/or with bicycle access to high-quality bicycle infrastructure.
- **Economic opportunity:** The current RIP proposal, according to its own economic analysis, will result in limiting new homeowners in Portland's single-family zones to high-income households. No longer will new construction be affordable to middle-income Portlanders. The price per square foot resulting from these regulations will increase, further accelerating price appreciation of existing homes. The allowable FAR should thus be increased for new development with multiple units; the cap on the number of units within a structure should be lifted (4 or more should be allowed by right); and the height calculation should be changed to clarify that a two-and-a-half-story house will always be legal in all zones. R2.5 zones should maintain their 35-foot height limit and not experience a reduction to 30 feet. Height should be

measured from the midpoint elevation adjacent to a structure, not the low point.

- **Affordability:** If the City chooses to not allow four units by right, and also chooses to not simply use a form-based code to regulate residential zones, then we strongly recommend the following:
  - In order to receive a bonus unit, a developer should only need to provide one unit affordable to households making 80% or less of MFI;
  - Two bonus units should be available to developers who provide at least two units affordable to households making 60% or less of MFI.
  - In no way should a developer be required to make all units affordable. Where would the money come from to subsidize this activity? Will Council be instituting a new tax to raise the hundreds of millions, if not billions of dollars that would be required? If not, then simply write a sensible code that allows the market to provide affordable units as a part of a market-rate project.
  - Single-family zones should NOT be held to a higher standard than buildings with 20 or more units, which can amortize their site acquisition costs over more units and are only required to provide 20% affordable units.
  - If affordability is the goal, and the principles of inclusionary zoning are to be applied, then a fourplex should be allowed on any single family lot in the city, if at least one of the units is affordable to 80% MFI, and one of the units is visitable. (The current building code requires one ADA-adaptable unit in new fourplexes, so this last point would just synchronize the zoning code with the building code.)
- **Scale:** If a project meets the criteria of one affordable and one visitable unit, then the project should be eligible to build up to 0.9 FAR, 35 feet in height, and with a front setback of ten feet (to maximize the amount of private back yard area shared by residents). This will allow the market to best deliver products that meet the economic needs of our neighbors over the coming decades.

We believe that these adjustments to the RIP proposal will allow neighborhoods to determine their future destiny in terms of defining the terms of the character of future development, while allowing for the diversity of housing types that must be built in order for supply to come into balance with the changing demographic demands of future generations.

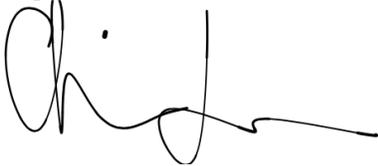
Finally, a brief note regarding **narrow lot development:** The Concordia Neighborhood Association has previously fought against the development of skinny houses in our neighborhood, in particular those that sought to skirt regulations in order to build houses taller than would otherwise be allowed. In fact, we appealed the approval of one such house all the way to the State Land Use Board of Appeals. We have also been subjected to many skinny houses built on streets with alleys, where the house nonetheless features a garage facing the street instead of the alley, making a mockery of statements in the Concordia Plan (developed as a part of the Albina Plan process) to preserve the pedestrian orientation of the front yard, and to minimize the impact of the automobile. We therefore feel the need to express our support for the new policies embodied in the staff proposal for the RIP with regards to narrow lot development. We applaud the requirement that the pedestrian character of the front of skinny

houses be preserved, either by tucking parking in the rear to feed to an alley, by sinking parking to the basement level, or by eliminating on-site parking entirely. We are in favor of the new height limit for skinny houses, so that their height is proportionate to their width and they do not loom over any of their potential single-story house neighbors. We are encouraged that those of us who own a vacant 25' historically planned side lot will retain our ability to develop such a lot into a skinny house in the future without needing to demolish our primary home. We are also encouraged that, when a house is demolished in order to access the underlying historically-planned lots in an R5 zone, that the resulting two primary units will be required to be attached, so that the resulting structure will be more energy efficient and visually appealing.

With all of the work that has been put into developing the Residential Infill Project, we recommend making these minor changes to the RIP, after which the City should give it a chance. Let's legalize true Missing Middle housing, including fourplexes, in our neighborhoods. Let's run the experiment to see if the next generation of houses will produce more affordable and attractive outcomes than those currently being built.

Speaking of which, we look forward to participating in the upcoming process to fine-tune our Community Design Standards, so that the next generation of homes built in Portland features better design than the current generation.

Signed,



Chris Lopez  
Chair, Board of Directors  
Concordia Neighborhood Association  
P.O. Box 11194  
Portland, OR 97211  
[landuse@concordiapdx.org](mailto:landuse@concordiapdx.org)

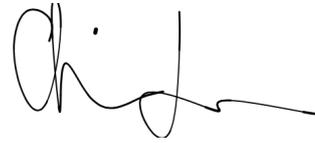
cc: Susan Anderson, [susan.anderson@portlandoregon.gov](mailto:susan.anderson@portlandoregon.gov), Joe Zender, [joe.zehnder@portlandoregon.gov](mailto:joe.zehnder@portlandoregon.gov)

DigiSigner Document ID: 981e0742-379d-46a9-9d73-ec0469878912

## Signer

Email: chair@concordiapdx.org  
IP Address: 71.56.137.172

## Signature

A handwritten signature in black ink, appearing to be "Chair", written in a cursive style.

Event	User	Time	IP Address
Upload document	garlynn@woodsongpartners.com	23/11/17 01:22:15 EST	75.164.208.60
Open document	garlynn@woodsongpartners.com	23/11/17 01:22:19 EST	75.164.208.60
Close document	garlynn@woodsongpartners.com	23/11/17 01:22:51 EST	75.164.208.60
Send for signing	garlynn@woodsongpartners.com	23/11/17 01:24:30 EST	75.164.208.60
Open document	chair@concordiapdx.org	26/11/17 12:11:47 EST	71.56.137.172
Sign document	chair@concordiapdx.org	26/11/17 12:13:56 EST	71.56.137.172
Close document	chair@concordiapdx.org	26/11/17 12:13:56 EST	71.56.137.172



## CULLY ASSOCIATION OF NEIGHBORS

Central Northeast Neighbors  
4415 NE 87th Avenue  
Portland, Oregon 97220

November 14, 2017

City of Portland  
Bureau of Planning and Sustainability  
Residential Infill Project  
[residential.infill@portlandoregon.gov](mailto:residential.infill@portlandoregon.gov)

### **RE: Residential Infill Project Discussion Draft**

Dear Planning Staff,

The Cully Association of Neighbors (CAN) is pleased to offer comments on the Discussion Draft of the Residential Infill Project. Our thanks to Nan Stark, Julia Gisler and Tyler Bump for attending our Transportation and Land use Committee meeting on October 17. This helped us to better understand the proposal, and there is much in it that we like. Once implemented, the provisions in this draft will create new opportunities for smaller, more affordable housing in many single-family areas. Our meeting also raised some concerns about how the proposal would impact Cully. The purpose of this letter is to articulate those concerns so they can be addressed in the Preferred Draft. Specifically, we are concerned about:

- Large portions of Cully that were left out of the Housing Opportunity ('a' overlay) zone, and
- The lack of a true "Cottage Cluster Code" in the draft.

The Housing Opportunity Zone, as proposed, excludes all of East Cully, that portion of the neighborhood between Cully Boulevard and 82<sup>nd</sup> Avenue. The stated reason for this is to prevent the displacement of vulnerable families from this area. Tyler explained that renters of detached, single-family homes are most at risk for displacement. Involuntary displacement is an overwhelming concern for CAN. It is reflected in our Inclusive Cully Policy, adopted in April 2015. That policy states that among other things we will:

- Encourage development of permanently affordable housing in Cully.
- Encourage development of workforce housing in Cully.
- Encourage renters to become homeowners to build wealth and stabilize families.
- Encourage moderately-priced individual homeownership.
- Support elders who want to remain in Cully and age in place.
- Encourage alternative designs for infill such as accessory dwelling units, small house "cottage clusters," and other strategies to promote more affordable, market-rate, infill housing.
- Support greater density of development where appropriate in areas that have good access to transit and other services.

All of these approaches could be furthered by the opportunities available in the Housing Opportunity Zone. Nonprofit developers might be able to construct affordable 3- and 4-

plexes on the R5 and R7 zoned lots here. Smaller scale market-rate units would be more affordable to working people. Older adults in the area would be able to downsize without having to leave their neighborhood. Also, as Tyler points out, due to the R7 zoning here, the area could be attractive to developers who want to build “trophy houses” larger than what the new code would allow in R5 zones. The Housing Opportunity Overlay would attract a different kind of development, more in keeping with our policy goals.

We appreciate the City’s concern that application of the overlay could increase development pressure. We don’t share that concern when a mere 10% of the development on single-family corner lots consists of a currently allowed duplex. If the City’s concern is valid, however, it will be a result of scarcity—not enough land within the ‘a’ overlay to meet the demand. There is an easy solution to that. Increase the amount of land zoned for Housing Opportunity. If most or all single-family zoned land were allowed the modest proposed increase of one unit per lot, no area would receive too much development pressure.

Our final concern about the exclusion of East Cully has to do with Cully Boulevard. We are very hopeful that Cully Boulevard will develop into the thriving commercial street envisioned by the Cully Boulevard Alliance and the comprehensive plan, which designates it a neighborhood center. The residential area east of Cully Boulevard should provide much needed vitality for the commercial district. This will be severely limited, however, by the R7 zoning. That zoning also creates a jarring transition to the multi-family and mixed-use zoning along Cully Boulevard. It will be much more graceful and beneficial to allow some “missing middle” housing in this area.

For many of the same reasons noted above, we were looking forward to the cottage cluster provisions of the new code. We are disappointed that we see only a couple of minor tweaks to existing codes. Allowing an ADU with each unit of a planned development is certainly a welcome change, but it only keeps Portland current with the requirements of Oregon law. Far from offering a density bonus that might persuade a developer to go through additional process, this code actually offers fewer units than could be built by right in the ‘a’ overlay zone. As proposed, it is unlikely to result in the flowering of small, affordable market rate housing that would be encouraged by a true cottage cluster code. Such a code, for example, might allow double or even triple the zoned density for cottages that were 1200 square feet or less.

Why does this matter to Cully? As you know, Cully has many large lots in single-family zones. Often these lots are quite deep with a relatively narrow street frontage. This makes them challenging to develop with more than a single house. Flag lots are not very desirable, but are currently the only available option for such lots. With a true cottage cluster code, these lots would lend themselves to developments that would provide Cully with more of the moderately priced housing we need.

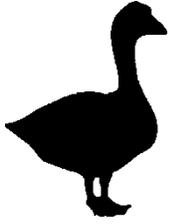
Another result of our large lots is that Cully has become a center for urban agriculture. There are currently 18 commercial farms in Cully. CAN values this part of our

neighborhood culture, and we fear that development pressure could bring about its demise. Many Cully farmers are working land that belongs to someone else, and could be subject to sale and development. Among the long-term strategies envisioned by Cully farmers, is to promote the development of a portion of a farm with something like a cottage cluster that could exist alongside a working farm. A fully developed cottage cluster code might enable such a solution.

Thank you for your consideration of our comments. We look forward to the next draft and the legislative process to follow. We see the Residential Infill Project as critical to the future of Cully and our dream of retaining the economic, racial and cultural diversity that we so value.

Sincerely,

Laura Young, Chair  
For the CAN Board



GOOSE HOLLOW FOOTHILLS LEAGUE  
2257 NW RALEIGH STREET PORTLAND, OR 97210 503-823-4288

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November 30, 2017

Portland City Council  
1221 SW 4th Avenue, Room 110  
Portland, OR 97204

Dear Mayor Wheeler and members of the City Council,

**RE: Comments on Residential Infill Plan**

The Board of Goose Hollow Foothills League would like to offer the following comments and concerns about the current draft proposal for the Residential Infill Project.

— We are especially concerned about inadequate protections for historic resources under the current proposal. Much more should be done to preserve our current housing stock of affordable and historic buildings, which are essential not only to our livability but also our relative affordability. In Goose Hollow, the cheapest rents by far are in our oldest apartment buildings. Most are on the National Register or are HRI listed. Yet these very buildings could be demolished too easily under the current proposal. A heavy-handed “build, baby, build” approach is not the answer to meeting our challenges and is likely to backfire. There ARE other, better alternatives to affordability and housing demand.

—Demolitions should be disincentivized with more effective tools and strategies, in order to prevent large amounts of affordable housing from going into our landfills. Yet the current proposal tends to encourage demolitions, which will artificially inflate the value of the underlying lot and disproportionately displace poor people and people of color as our most affordable housing is demolished.

— We recommend that any new ordinance only allow demolitions if half of new development is affordable at 60% MFI. This RIP draft does not require affordability for the first three infill housing units on a lot (e.g. duplex plus 1 ADU, triplex). If the project includes a fourth unit, then affordability to 80% MFI is required for all units. Economic analysis of what is currently being built demonstrates that very little affordable housing will be created, and an ordinance may only serve as a “McMansion Relief Act”. Therefore, we believe that much stronger incentivization for more affordable housing must be added.

— We recommend that FAR be measured to include semi-daylighted basements and attics. In the current draft semi-daylight basements (floor at least 4 feet below grade) are not included in FAR, and attics with less than 80 inches headroom as-built are not included, even if they can later be finished to more than 80 inches headroom with dormers. This will result in much larger buildings. FAR should include these buildable spaces to more accurately measure buildable spaces.

— We recommend that height be measured from the roof's highest point. In current draft measurement is from the midpoint of a gable roof. This misrepresents the mass and potential view and light obstruction of a building.

— We believe that a more compatible urban form is required. Since current housing heights in affected zip codes average 24', the proposed allowable heights of 36' will result in incompatible height adjacencies. New developments should not loom so tall over surrounding houses. Height should be changed to 24' for adjacent houses.

— Allowable square footage should be reduced to prevent McMansions being built instead of affordable housing. The current trend is that many older affordable homes are currently being demolished so that developers can build larger, more expensive homes. This is NOT improving Portland's livability OR equity. The current proposal will increase demolitions because it allows for much larger homes than most neighborhoods currently have. The draft doesn't mention that in the zip codes affected by RIP the typical (median) single family house is about 1,620 sq ft. Allowing a 2,500 sq ft building in R2.5 is larger than about 85% of existing houses. Allowing a 3,750 sq ft house in R5 is larger than about 98% of existing houses.

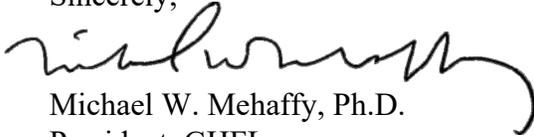
— The city's 2012 Buildable Land Inventory showed that under current zoning, Portland already has room to nearly double the number of housing units. In the Metro Centers and Corridors plan, the most desirable target for increases was in town center areas and their corridors – not in adjacent existing neighborhoods. We find it hard to understand why existing neighborhoods are being “thrown under the bus,” except out of a misguided mix of self-interest and a desire to engage in “divide and conquer” identity politics. To us, this would be a sad path indeed for Portland to take. From the perspective of wise planning for a livable city, such radical re-zoning isn't necessary to accommodate growth. A “gentler densification” is needed.

-- Lastly, we want to reiterate our concern (as we have expressed in other contexts) about stakeholder advisory committees with potential conflicts of interest, acting in ways that appear to relate closely to their own self-interests, rather than the best long-term interests of the city and all its residents. We do have concerns about the composition of the RIPSAC stakeholder advisory committee in that regard.

Mayor Wheeler and Members of the City Council  
November 30, 2017  
Page Two

As we have said before, we believe it is essential that Portland's planning processes be above ethical reproach, in fact and in appearance. Citizens need to know that the City is working diligently and wisely to build on our livability, to safeguard and improve it – and not succumbing to the same corrosive economics and divisive politics that are destroying livability in so many other cities.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael W. Mehaffy". The signature is fluid and cursive, with a large, sweeping flourish at the end.

Michael W. Mehaffy, Ph.D.  
President, GHFL

## Tracy, Morgan

---

**From:** Janet C Hawkins <janetchawkins@msn.com>  
**Sent:** Tuesday, November 21, 2017 11:17 AM  
**To:** BPS Residential Infill  
**Cc:** bnesta@msn.com; Hurwitz Brynna; Leslie Hammond  
**Subject:** Hayhurst NA Residential Infill Project Comments

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Categories:** DD\_Comment

To the City of Portland Bureau of Planning & Sustainability:

I am writing in my role as Chairperson of the Hayhurst Neighborhood Association (NA).

The Hayhurst NA approved a motion at its November 13, 2017 meeting to send the following statement to the city about the Residential Infill Project Housing Opportunity overlay zone content.

Hayhurst supports the one of the original stated goals of the project which was to accommodate growth in Portland and an increase in demand for housing while, at the same time, preventing widespread demolition, displacement and destabilization.

Hayhurst supports the preservation of single family neighborhoods with opportunities for increased density that exist now.

Hayhurst generally supports the proposed floor area ratio changes for scale of houses but recommends that the lot coverage should be related to lot size.

Rationale for opposition of the "a" overlay:

The RIP ignores the available biddable property and allowable additional structures in single family neighborhoods that exist across the city under the current code. For example, BPS admits that 5% or fewer corner lots on which a duplex is allowed have been developed in that manner.

Specifically, Hayhurst recommends the removal of the new "a" overlay which is bounded by SW Vermont, SW 45<sup>th</sup> Ave, SW 35<sup>th</sup>, SW Iowa and SW Nebraska, SW Cameron, SW Kanan, SW Boundary, SW 58<sup>th</sup> and SW Fairvale. The rationale stated for inclusion of parts of these predominantly single-family residences was walking proximity to a commercial area at SW 45<sup>th</sup> and Vermont. SW 45<sup>th</sup> and Vermont is not a full service commercial center.

Hayhurst supports the concentration of higher density development along Beaverton-Hillsdale Highway at such time as safe sidewalk infrastructure is installed that will allow safe walkable access to shopping and other services. .

The RIP fails to insure housing affordability and likely will result in continued demolitions, displacement and an increase in investor owned city.

The RIP proposes to destroy single-family neighborhoods, which are clearly desirable by a large portion of the population

The RIP has not been subjected to a robust analysis of impact.

The RIP fails to consider infrastructure that is needed to support the proposed spread of density.

The RIP is based on the false assumption that car transportation will phase out.

The RIP fails to require sufficient off street parking resulting in street congestion and decrease in walking safety particularly in areas where there are no sidewalks.

The RIP is a one size fits all approach to accommodating increased growth in Portland but provides no alternatives for achieving the goals, which allegedly guide the proposal.

Thank you,

Janet Hawkins, Chairperson

Hayhurst NA



**HOSFORD-ABERNETHY**  
NEIGHBORHOOD DISTRICT ASSOCIATION

November 30, 2017

Dear Planning Staff Members:

The HAND Board continues to support many of the recommendations within the Residential Infill Project, but we remain concerned about potential negative impacts of the proposal such as an increase in demolitions, the loss of even more affordable housing in our neighborhood, limited opportunities for ownership of the new, smaller structures, the lack of design guidance as infill occurs and finally a loss of sense of place.

The RIP proposal includes three very different proposals: Scale of Houses, Housing Opportunity, and Narrow Lots. Each of these topics would be complex enough on its own, but when amalgamated into a single proposal, it becomes overly complicated and confusing. We would therefore suggest separating each of these components into its own proposal, which could be discussed independently from the others.

### **Scale of Houses**

The proposals for reducing housing size are a good start, but do not go far enough. Though the proposal represents a significant reduction from what is theoretically buildable now, the proposed structure sizes are still much larger than almost any of the existing housing stock in HAND. We would ask that this proposal be further strengthened, with size and height further reduced, perhaps by including basements and attics in calculations of a house's square footage if they are less than 2ft above ground, or are tall enough for dormers to be added to create a usable living space respectively.

While we generally support the increased uniformity of setbacks you have proposed, we would like to see a similar approach applied to height, perhaps limiting houses to a height of their tallest neighbor plus 5 feet. The proposed codes seems to allow a decrease in front setbacks and we want to make certain that it also allows an increase in front setbacks to match adjacent neighbors.

The code should not allow low point of street facing property to be artificially raised through use of a retaining wall and the grade should not be allowed to be artificially built up to alter reference point ("low point") for measuring height of the building.

### **Housing Opportunity Overlay**

The Housing Opportunity proposals fundamentally redefine what it means to live in a single-family zone. If that is your intent, we would ask that you simply change the meaning of the underlying zones rather than rely on the overlay mechanism.

However, we are concerned that making such sweeping changes to the zoning code whether or not an overlay is used, without any site-specific context, could lead to many unintended consequences.

Large portions of East Portland are being excluded from the overlay zone because of lack of infrastructure, school capacity, etc. If the RIP is a long term approach to housing in Portland, there needs to be a continuing strategy for building "complete" neighborhoods in East Portland that includes infrastructure investments and is sensitive to involuntary displacement issues. This would allow residents in those neighborhoods to also take part in creating new housing options. Often increased density leads to more frequent transit service rather than the reverse.



Where triplexes are permitted on corners, please ensure that at least one entrance is facing each street. This is likely what was intended, but the proposed code language does not require this.

Allowing internal conversions of larger single-family houses to duplexes or even triplexes is a way to add density and create more housing opportunities while avoiding many of the negative issues associated with new construction. We would support moving this provision out of the overlay zone and into the base zoning, and applying it city-wide.

However, before doing this consider revisiting the definition of a “demolition” and a “major remodel” to make certain internal conversions don’t lead to defacto demolitions.

To counter the incentives for demolition presented by the overlay proposal, we would ask that bonus units only be awarded if existing structures are preserved.

We are very supportive of cluster housing but are uncertain how the Planned Unit Development review process designated for their siting would address total FAR, lot size, number of units, building orientation to street and neighbors, open space, etc. There needs to be flexibility to allow creativity while ensuring quality design.

### **Narrow Lots**

Where narrow lots currently exist, we support the proposal to require adjacent houses to be attached. This will increase the livability of the units, and will improve their exterior appearance.

Consider reducing building height of common wall structures on lots less than 5000 sq’ to 30’.

Please look again at the relationship of FAR to the size of the lot. The recommended 0.7 for narrow lots seems like it would be out of scale in some neighborhoods and limiting the FAR to 0.5 on all residential lots would be more consistent with existing patterns. Perhaps an adjustment process could be used in those instances where existing residential patterns are closer to 0.7 on surrounding lots.

### **Tree preservation and Stormwater Management**

A healthy urban tree canopy, and smaller, discreet, and more flexible housing options can go hand in hand. However, we have watched large, mature trees disappear as lots are split in our neighborhood. Design flexible code provisions that incentivize saving larger trees and creating less impervious surface. These incentives could include parking requirement changes, and flexibility in building siting and setbacks, among others.

### **Ownership Options**

Explore the likely ramifications and potential pitfalls of extending fee-simple ownership options, condominium conversions, co-housing and other strategies for ownership that could be applicable in these situations.

### **Affordability**

What is missing from this proposal is any focus on our disappearing stock of affordable housing. To the extent that the Housing Opportunity ideas work, they will accelerate the demolition and redevelopment of our most



**HOSFORD-ABERNETHY**  
NEIGHBORHOOD DISTRICT ASSOCIATION

affordable housing stock, replacing them with significantly less affordable housing. A prime example is the demolition of the house at 2838 SE Woodward. A historic house used as shared rental housing for a group of adults was demolished and replaced with two huge houses that sold for \$900K each. Density increased, but at the cost of affordability. Renters were displaced, the community lost income diversity, and the new structures did not fit well with their surroundings. To reduce the incentives for further losses of affordable housing, we would suggest:

Additional limitations on the size of housing (as outlined above) are probably the single most effective way to limit the cost of new housing. Smaller houses are inherently less expensive than larger houses. While we do not believe this is a panacea for our housing crisis, this will help more slow the growth in housing prices more than anything else in this proposal.

Introduce further limitations on using ADUs as short-term rentals, thereby encouraging them to be rented to long-term tenants. Do not continue to waive SDC's for projects that cannot commit to at least a set time period with an affordable rent and/or a commitment to providing long term rental housing, especially in inner tier neighborhoods. Encouraging the development of more ADUs does not help with affordability if the units are not rented to those that need them.

Where a bonus unit is awarded on grounds of affordability, please lower the definition of "affordable" from 80% MFI to 60% MFI to allow these units to benefit those who are having the most difficulty in the current market.

We also support exploring some of the options for increasing affordability laid out by SMILE:

Require the additional (third) unit to be affordable (as a bonus unit)

Subsidize purchase of a duplex and owner occupancy of one unit if the second is an affordable rental.

Have fees from short-term rentals help to subsidize affordable housing in the same neighborhood

Dedicate tax revenue from the additional unit to provide affordable housing in the same Neighborhood.

Provide an incentive for duplex or triplex owners to occupy one of the units, perhaps for a first time buyer willing to rent the additional unit(s) at an affordable rate.

We share the concern of others that new duplexes and triplexes are more likely to be investment properties where an owner is less likely to engage with the neighborhood. We want the new smaller scale housing to provide new opportunities for more people to own property, escape future out of control rents and begin to build wealth as other groups and previous generations have done.

We would like to see resources devoted to the development of a toolkit and perhaps regular "Lunch and Learn sessions to assist homeowners wishing to add housing units, whether as ADU's or internal conversions, that could provide step by step assistance in navigating the appropriate bureaus, information on strategies to increase accessibility, references for design guidance and options for sharing ownership.

Thank you again for all your hard work on this project and for considering our ideas.

Susan E. Pearce, HAND Chair

BPS and the Portland City Council:

While the LNA has been supportive of many of the elements of the Residential Infill Project, the latest iteration has serious deficiencies. The biggest problem is the location of the Housing Opportunity Overlay Zone. It focuses growth and density in the areas that are already absorbing the most growth and density, inner east Portland.

The east side of Portland, and especially residential neighborhoods, have been severely impacted by demolitions and less-than-compatible new development in the last decade. Many of the smaller, most affordable houses have been targeted for removal and often replacement with a much larger single-family home. The new multi-family structures are also often out of scale with the existing neighborhood, and get built by contractors who use standard suburban designs. The building and opening of such structures continues today. Despite absorbing this growth, largely without opposition or complaint from the current residents, you now propose that we also absorb the bulk of new mid-level housing.

In addition to forcing additional growth in the areas that have already experienced most of the recent development, you are now adding additional growth by allowing 2 ADUs on single-family lots as well as duplexes and triplexes. While the limits on size and setbacks are welcome (though significantly larger than the great majority of existing homes), those limits will not mitigate the burden on infrastructure or the negative impacts of density.

We appreciate that there is a great need for affordable housing. Unfortunately, the current RIP proposal won't do much if anything to increase the affordable housing supply. Economic analyses done on the RIPSAC have so shown. Since the current RIP proposal also puts the overlay zone in areas that have experienced substantial housing price increases, the logical conclusion is that most of the new units created will also be expensive. In fact, based on recent experience, RIP is likely to encourage the demolition of smaller, more affordable homes to be replaced by larger, more expensive structures. This is environmentally unsound as well as bad housing policy.

The LNA is not opposed to increased density in or around Laurelhurst. We believe most residential neighborhoods would willingly accept well-conceived density. Making it easier to internally convert a single-family home to a duplex is sensible. Allowing an ADU is also a sensible form of growth even though we often replace greenery with a structure. The state recently allowed inclusionary zoning, which directly addresses affordability. You should allow this type of growth to occur and assess the impact before allowing triplexes, cottage clusters and second ADUs in single-family zones. You should also spread the impact by placing the overlay zone on all single-family zones in Portland.

One of Portland's great strengths is the thought and planning that we put into development. We usually don't let the current crisis stampede us into actions that can have negative impacts for decades. We make thoughtful changes and assess the pros and cons that result. And we use that assessment as a guide to future changes. Please continue Portland's proud tradition of preserving the best of what we have while adapting to the future we want.

--

Scott Pratt

LNA President

## **Comments regarding RIP**

Submitted into the record via email Nov 27, 2017

From the MTNA LU committee

To Whom it May Concern -

The Land Use Committee of the Mt. Tabor Neighborhood Association (MTNA) submits these comments into the record for the Residential Infill Project (RIP) Discussion Draft, including the Staff Report and Amendments (Oct 2017). These comments are in three parts below. Part I registers our grave concerns with the process by which the RIP proposal comes into being. Part II enumerates the underlying flaws of this proposal's approach to the problem it was tasked to solve (and fails to solve). And Part III provides our evolving feedback within the three specific categories of Scale, Housing Opportunity, and Narrow Lots through which our comments were directed to be filtered.

### **Part I – Process concerns**

RIP was meant to form a working group that would strategize around the pressing dual crises of:

- 1) The lack of affordable housing in Portland, and
- 2) The demolition of existing homes by developers who replace them with more expensive homes.

It has morphed into something surprisingly far reaching, that will have a greater impact on zoning codes in Portland than the Comp Plan has had, and all without the support of tested data to reassure us that the drastic approach called for will in fact increase affordable housing stock, or reduce wasteful demolitions.

While the RIP is supposedly aligned with the ideals of the Comp Plan, it happened outside the Comp Plan processes, public and otherwise. It is in our assessment aligned in argument only, not in practice, with the equity and environmental goals of the Comp Plan. It undermines the monumental efforts and attention given by citizens to the primary process, the Comp Plan, in which the citizenry was engaged for the last 5 years with the impression they were looking at these same issues. All that work with smart development along nodes and noodles to create walkable neighborhoods, goes out the window now as, suddenly, every lot in SE is re-classified to be high service access.

Via RIP, one working group will have the single largest effect on the built environment seen by any member of this MTNA committee. The Residential Infill Project is proposing amendments to some of the Comprehensive Plan's most important implementation tools — the Zoning Code and Zoning Map -- with much less public involvement and policy analysis. In addition, the project is proposing to amend the Comprehensive Plan map itself. All of these changes come before the ink is even dry on the Comp Plan and its lengthy process.

### **Part II – Underlying flaws with RIP's proposed approach**

We need more "middle housing" in Portland. The method on which the RIP proposal has landed is not supported by data, and it will **amount to a financial boon for those that *already own land/homes*** and the developers that continually acquire and flip land/homes in high-priced areas. This proposal will further divide the haves and the have-nots. It will institutionalize a long-term housing crisis the likes of that seen in San Francisco.

The right to build 3 or 4 homes where there is now just one, is a gift of new property development rights to those that own and develop land. It triples and quadruples the return potential of each lot. This will rapidly drive-up land prices, not down, which will only fuel the increases in purchase prices for older homes and lots, which will in turn drive up final sales prices for all new units built. Advocates insist that eventually, some affordable housing will trickle down to the people, either through weak incentives to build cheaper, or from the "filtering" effect whereby some of the housing stock becomes less attractive as it ages and then becomes affordable. But the data shows **the filter process takes generations/decades to produce affordable housing stock, if it ever does**, and that it is notably unpredictable and oddly disrupted in cities with rapidly rising housing prices like Portland (see [http://www.urbandisplacement.org/sites/default/files/images/udp\\_research\\_brief\\_052316.pdf](http://www.urbandisplacement.org/sites/default/files/images/udp_research_brief_052316.pdf) ). In short, the idea that an increase in supply will bring down the cost of housing, mostly holds true (with effects taking *decades* to manifest) UNLESS you are in a strangely hot housing location and then it doesn't. In fact, the data collected in San Francisco shows that new unit construction (which increased supply and was therefore expected to lower prices) brought HIGHER rental prices in the short and long term, because development happened in locations that draw the most rent. The RIP plan directs *all projects* to what is already the most expensive land with the highest rent within the growth boundary, while excluding under-developed land that is also inside the growth boundary. RIP's approach to middle housing will raise the price of the land under our feet, the cost of homes and rents in our neighborhood, and encourage demolition of older homes. It is the exact opposite of what RIP was tasked to do. **It is a windfall to land owners and developers, without a single mandate that forces affordable units to be built as part of the bargain.**

BPS planners understand this proposal will bring displacement, which is why areas that have higher rates of displacement-vulnerable populations are not included in this new overlay scheme. RIP will be the death knell for vulnerable populations and economic diversity in our own neighborhood. Think about it. If a plan is supposed to bring affordable housing, it does NOT displace vulnerable populations that need affordable housing. If a plan is expected to bring displacement to vulnerable populations, you know its service to affordable housing is fake.

**RIP is bad for vulnerable populations and equity in the Mt. Tabor Neighborhood Association boundaries.** It is not sufficient to launch a plan that will displace our population, with the faint promise that several generations from now we may finally have some affordable housing again, all while we offer land owners and developers the unexpected windfall of new property development rights. We seek modifications to RIPs proposal, to mandate the types of housing our neighborhood needs: affordable and family friendly housing.

### **Part III – Specific feedback**

Our committee offers comments in the requested categories of Scale, Housing Opportunity and Narrow Lots, below.

#### Scale

- Do not allow increased height for multiple units. This encourages development that is out of scale with existing housing. Either the scale of a neighborhood is worth honoring, or it isn't. Make it consistent and predictable to everyone. Access to solar and air on my property should be a right, no matter if the lot next to me decides to build multiple units or not.
- At the encouragement of the City and in line with the City's stated carbon reduction goals, residents across this city have invested (often to personal strain) in sustainable

energy technologies and techniques at their homes. And they have done so within an understanding of the zoning codes near their buildings. RIP's sweeping changes, which confuse access to air and solar, create a high level of uncertainty about the residential built environment and this will have a chilling effect on the market of sustainable technologies for residents.

- As RIP proposes to allow shorter front yard setbacks to conform with adjacent houses, the RIP should similarly consider conformance with adjacent houses in terms of height, overall size, and deeper front-yard setbacks.
- We predict RIP's untested experiment -- and the frenzy it will bring of developers that swoop in with cash to tear down and build more upscale -- will shut out of the market other affordable housing models which have *already proven themselves* to both save older homes and increase affordable housing stock. We seek changes to RIP that ensure the proliferation of programs like what REACH was in its early days -- models in which older homes that are part of the existing fabric are modestly remodeled to suit the program. RIP's current approach will always change the fabric and scale. By increasing market pressure from developers who have the capital to demolish and build multiple units (typically more expensive and out of character units) in their place, a project that both reuses an existing home AND brings our neighborhood an affordable home, has little chance.

#### Housing opportunity

- The prediction that families will not be moving to Portland is out of step with the reality experienced in our neighborhood. For more than a decade, families have been moving to Portland to live in an urban center built around progressive policies where one can still find a home with a small yard just big enough to grow a garden. Mt. Tabor does not have enough family friendly housing for the number of families looking to live in our neighborhood today. In our experience, a modest family friendly home is 3 bed + 1 bath + a small yard (and this also aligns with what programs like Habitat for Humanity typically allocate for family friendly housing). The prediction by RIP that future housing is not family housing, is a self-fulfilling prophecy. If we don't build it, no, I guess they won't come anymore. But for our neighborhood, we emphasize a need for more family housing, not less. As such, we'd require each lot being redeveloped to a multi-unit model to have no less than two units with 3 bedrooms/1 bath and access, to unpaved, outdoor space for each.
- There *are processes in place already*, whereby a corner lot can be thoughtfully redeveloped as a duplex, an interior parcel can be sensitively developed, and an existing house can incorporate two new ADUs. Yet, we have an affordability crisis -- because developers are not interested in affordability. Those who purchase property for an investment (as opposed to those who purchase property for a *home*) are forever seeking more opportunities to build, ever more expensive houses, in the hottest locations so as to maximize their own profit. RIP proposes to hand these developers a boon, it will attract more investment speculators (not homeowners), and it does so wrapped in the naïve hope that in the process surely someone will build something affordable.
- We assert RIP does not do enough to guarantee affordable housing will be built. We assert an affordable housing mandate should be tied to every multi-unit redevelopment of a lot. If more than two units are planned on a redeveloped lot, one affordable unit should be mandated. For 3-10 units on a property redevelopment, 1 should be mandated affordable. For 11-20 units on a redeveloped property, 2 should be

mandated affordable units. And this should apply across all housing, including mid-rise condos.

- Detached homes, even very small older ones with only a small yard, provide breathing room that is incalculable in terms of livability. They are quieter, lighter, and have better air circulation without the need for conditioning. This is a valued way of living, and should not be maligned in an examination of the city's housing options. RIPs model incentivizes tear downs of existing, small, older homes. We seek changes that reverse this course.
- The increased density envisioned as a result of the expanded "a" overlay will increase the stress on the transportation and utility networks, open spaces, and other commons without the capacity planning analysis that is best practice. Among its mandates then, RIP should devise a mechanism by which the City is scripted to rapidly deploy the SDC funds it is collecting, into localized infrastructure upgrades.

#### Narrow lots

- The RIP directly contravenes prior Council decisions regarding R2.5 zoning for historically narrow lots.
- The Comp Plan integrated decisions about land use and zoning (which the RIP seeks to supersede) with decisions about transportation, open space, and other aspects of our shared urban fabric. The RIP does not consider how these factors interact, or ensure that City policies are aligned to meet multiple objectives. **The RIP assumes, without clear evidence, that increased densification will automatically achieve policy goals for affordability, while ignoring the very clear risk that it will conflict with other policy goals.**
- Policies are increasing densification, while park space remains stagnant. The greater intensity of building proposed by RIP clearly carves away at our established and dispersed tree canopy, while it also promises to shrink much of the open space families have available to them on a daily basis, through the small amount of light and air and yard they have on their own property.
- The RIP would essentially re-zone much of the east side, with scant evidence that it will achieve desired outcomes, and without consideration of other aspects of livability. The eastside will go from "green" to "gray" as yards and established trees are removed to make way for narrow lots, flag lots, etc. These bits of nature in the city, even though privately owned, contribute to a cumulative public good – open space, mature trees, permeable surfaces, views of the sky. This public good should be traded away only when it is clear that a net public benefit would result.

Sincerely,

Stephanie Stewart, Mike Turaski, and Sharon Nobbe

*On behalf of the Mt Tabor Neighborhood Association land use committee*

Contact Stephanie Stewart: [stewartstclair@gmail.com](mailto:stewartstclair@gmail.com)

30 November 2017

Residential Infill Project  
Project Director Morgan Tracy  
[Residential.infill@portlandoregon.gov](mailto:Residential.infill@portlandoregon.gov)

Portland City Council  
Council Clerk  
[cctestimony@portlandoregon.gov](mailto:cctestimony@portlandoregon.gov)  
1221 SW Fourth Avenue, Room 130  
Portland, Oregon 97204

**Re: Residential Infill Project Discussion Draft and A Overlay**

The Multnomah Neighborhood Association (MNA) supports the provisions of the Residential Infill Project (RIP) that retain the character of existing neighborhoods. Reducing the scale of new housing, measuring building heights from the lowest point of the lot, and averaging setbacks will allow infill to blend into the neighborhoods. These provisions will help to protect the character of Portland's vibrant and unique neighborhoods while accommodating growth.

MNA opposes the RIP's A overlay that will affect 85,000 properties in general and for Multnomah in particular that will wipe out the neighborhood's single-family character. We also oppose changing the base zone from single-family to multi-family housing without any planning process that involves the public in an authentic and serious way. If additional capacity is needed, then we support land-use planning best practices that require that base zones be changed in the Comprehensive Plan with community input. This approach would be consistent with Oregon's Land Use Goals.

We are particularly concerned over the perverse incentive the RIP represents for developers to continue to demolish sound affordable housing and replace it with outsized and outpriced housing, displacing middle- and lower-income residents.

We have a case in Multnomah on SW Canby near Gabriel Park where an R7 property was sold and a subsequent permit for an ADU obtained. Once the ADU permit was secured, the developer applied for a demolition permit of a wonderful large ranch house that had been upgraded over the years for both energy efficiency and modern appliances and other appointments. One person on our land use committee believes that some fees were avoided by this sequence of ADU and demolition permits.

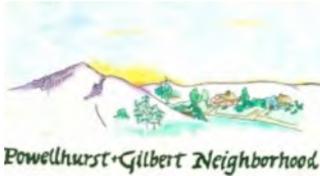
In any event, transforming the base zone of single-family residential housing by the fiat of the A Overlay into multi-family housing is an incentive for exactly this kind of demolition and

redevelopment without any public input. The A Overlay needs to go, and the BPS should develop an intelligent and sensitive option for accommodating density in neighborhoods.

During the City Council hearings on this issue, the Commissioners asked for three or four options to the RIP for them to consider. This never happened, apparently because of an executive decree. The result is an Overlay which disrespects City Commissioners and neighborhoods alike. Portland deserves better than this and can do much better!

Martie Sucec  
Chair, Multnomah Neighborhood Association  
7688 SW Capitol Hwy  
Portland Or 97219

cc: Mayor Wheeler, [mayorwheeler@portlandoregon.gov](mailto:mayorwheeler@portlandoregon.gov)  
Commissioner Fritz, [Amanda.Fritz@portlandoregon.gov](mailto:Amanda.Fritz@portlandoregon.gov)  
Commissioner Fish, [nick@portlandoregon.gov](mailto:nick@portlandoregon.gov)  
Commissioner Eudaly, [chloe@portlandoregon.gov](mailto:chloe@portlandoregon.gov)  
Commissioner Saltzman, [dan@portlandoregon.gov](mailto:dan@portlandoregon.gov)  
City Auditor Hull Caballero, [auditorhullcaballero@portlandoregon.gov](mailto:auditorhullcaballero@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)



## Powellhurst-Gilbert Neighborhood Association

East Portland Neighborhood Office,  
1017 NE 117<sup>th</sup> Avenue, Portland, OR 97220

pgnaboard@gmail.com

November 14, 2017

Dear Bureau of Planning and Sustainability,

The Powellhurst-Gilbert Neighborhood Association wishes to voice strong support for the Bureau of Planning and Sustainability's proposed Residential Infill Project, provided BPS retains the October 2017 version where the "a" overlay has been subtracted south of Division Street.

As part of the 1996 Outer Southeast Community Plan our neighborhood was asked to absorb a considerable amount of the new density in Portland. During the ensuing twenty years there has been little investment in infrastructure to support the increase in population that has happened in our area. Our schools are over capacity, and we have a woeful lack of appropriate infrastructure such as sidewalks and well-connected streets to support even our current zoning. While we seek more investment in our area, our basic resources and infrastructure have not kept pace with the increased population that we have been asked to sustain. The Residential Infill Project provides a way for other neighborhoods that have significantly more robust infrastructure to share the increased density that comes with Portland's growth. These same neighborhoods have enjoyed significantly more benefit from this growth than our area, and we believe that it makes sense to shift some of Portland's projected density to parts of our city that more easily have the capacity accommodate this growth at less cost.

During our last PGNA meeting on 11/6/17 we voted overwhelmingly to support the Bureau of Planning and Sustainability's current configuration of the Residential Infill Project.

- The schools within our neighborhood do a wonderful job with the resources that they are given, but the number of school aged children in our area has burgeoned in the last couple of decades, and there has been a significant increase in the percentage of students who receive free or subsidized lunches because of their income levels.
- We appreciate having new contiguous sidewalks along 122<sup>nd</sup> and 136<sup>th</sup>, but Powell Boulevard and most of our side streets still lack safe passage for our children. The connectivity within our neighborhood is lacking, and most of our constituents lack good accessibility to parks, grocery stores, commercial establishments and other community resources.
- We appreciate that the Bureau of Planning and Sustainability appears to be recognizing environmental considerations such as steep slopes, liquefied soils, and fault lines in their consideration of where to apply the "a" overlay.

For these reasons the Powellhurst-Gilbert Neighborhood Association strongly encourages you to keep the Residential Infill Project's October 2017 version, with the "a" overlay removed south of Division Street . Thank you for your time and consideration.

Sincerely,

Richard Dickinson  
Co-Chair, Powellhurst-Gilbert Neighborhood Association



Nov. 29, 2017 <sent this date to the email addresses below>

City of Portland

Attn: Residential Infill Project (residential.infill@portlandoregon.gov)

1900 SW 4<sup>th</sup> Ave, Ste. 7100

Portland, OR 97201

CC: Planning and Sustainability Commission ([psc@portlandoregon.gov](mailto:psc@portlandoregon.gov))  
City Council (<[MayorWheeler@portlandoregon.gov](mailto:MayorWheeler@portlandoregon.gov)>,<[dan@portlandoregon.gov](mailto:dan@portlandoregon.gov)>,  
<[nick@portlandoregon.gov](mailto:nick@portlandoregon.gov)>,<[Chloe@PortlandOregon.gov](mailto:Chloe@PortlandOregon.gov)>,  
<[Amanda.Fritz@portlandoregon.gov](mailto:Amanda.Fritz@portlandoregon.gov)>)  
Tracy, Morgan ( Planning) ([Morgan.Tracy@portlandoregon.gov](mailto:Morgan.Tracy@portlandoregon.gov))  
Joe Zehnder ([Joe.Zehnder@portlandoregon.gov](mailto:Joe.Zehnder@portlandoregon.gov))  
BPS District Liaison, Nan Stark ([nan.stark@portlandoregon.gov](mailto:nan.stark@portlandoregon.gov))  
CNN Exec. Dir., Alison Stoll ([alisons@cnncoalition.org](mailto:alisons@cnncoalition.org))  
CNN Involvement, Sandra LeFrancois ([sandral@cnncoalition.org](mailto:sandral@cnncoalition.org))

Subject: RCPNA testimony on the Residential Infill Project (RIP) Discussion Draft Refinement Project, 6+ Month Extension Request and Recommendations

Dear BPS RIP Staff, Morgan Tracy and team,

Thank you for the opportunity to comment on the BPS's Residential Infill Project Discussion Draft. We understand that the comment period for this draft is to conclude on Nov.30, 2017, by 5:00 pm.

On Nov. 7<sup>th</sup>, 2017, the Rose City Park Neighborhood Association Board unanimously agreed to the Recommendation:

"The Public Comment Period for the RIP Discussion Draft deadline needs to be postponed for at least 6-months".

(Supported by 86% surveyed)

*The Board's reasoning for this comes from opponents and proponents, alike, including:*

- 1. A better understanding of the potential infrastructure and service impacts of the proposal, including schools, stormwater, sanitary sewer, water, power(electricity & gas), communications, and private utilities;*
- 2. To allow more neighborhoods the opportunity to review the massive RIP documents proposed and make knowledgeable recommendations; and*

3. *To allow the City to better explain the housing need for small apartments that would be at the sacrifice of existing home ownership housing.*

On November 16, 2017, the RCPNA Land Use and Transportation Committee added to this recommendation. A neighborhood survey was developed the last week in October that was based on LU & TC Oct. 19th RIP Tentative Recommendations. This survey was publicized on Nov. 2<sup>nd</sup> to the neighborhood residents and businesses using emails through MailChimp, Nextdoor blog, and our RCPNA.org and Facebook websites. This neighborhood survey was concluded on Nov. 15<sup>th</sup> and used as the basis for the Committee discussion. This survey received 135 responses and all respondents provided their names and addresses, confirmed as located within RCPNA boundaries.

The RCPNA LU & TC unanimously also Recommends the following:

1. Reject the RIP Discussion Draft proposing "a" Overlay for all Low Density Residential Properties , based on:
  - A. Impact on existing neighborhoods is too excessive. Will spur additional demolition of existing homes by developers in order to create higher density and increased cost rental housing/square foot;
  - B. 'Centers' shown for use in 'a' Overlay(p.45 of <https://www.portlandoregon.gov/bps/article/657688>) conflicts with 'Centers' in adopted 2035 Urban Design Framework map, Figure 3-1, p. 29 Chapter 3 Urban Form (<https://www.portlandoregon.gov/bps/article/579166>). Proposal wrongly identifies 60th St. Station Area as a 'Center' from which properties within a 1/4 mi. radius from its edge are included in the 'a' Overlay
  - C. Fails to comply with City Council's 12/09/16 RIP direction, "Council did not vote on the conceptual boundary criteria for the Housing Opportunity Overlay Zone. Rather commissioners asked staff to come back early next year with mapping options." BDS has failed to provide Housing Opportunity Overlay Zone/'a' Overlay mapping options.

(Supported by 84% surveyed)

2. Reject proposed Rezone of Historically Platted Skinny Lots from R5 to R2.5, based on:
  - A. Reverses the City Council direction on RIP final hearing, 12/09/16 where the record states: "Council did not approve staff's recommendation to rezone historically narrow lots currently R5 zones to R2.5....Instead, Commissioners voted for an amendment that would not allow individual R5-zoned historically narrow lots to be developed - even when they have been vacant for more than five years, as presently allowed."
  - B. Promotes demolition of existing homes in R5 zone where developers will remove existing structures in favor of constructing higher density housing on two

historically narrow lots. City Council Dec. 2016 RIP decision states, "To encourage internal conversions over demolition..."

- C. Promotes spot zoning inconsistent with maintaining historic neighborhood fabric of housing together with the following issues:
1. Does not transition from high to low density zoning;
  2. Does not match historic pattern of the lots;
  3. Does not provide access to high-frequency transit and services, such as grocery stores; and
  4. Raises the question of legality, what right does BPS have to rezone property without the consent of the owner(s)?

(Supported by 83% surveyed)

3. Reject limitation on allowed off-street parking and garage options for narrow lots. The Proposed Draft restricts parking to front loading and access from alleys.

(Supported by 72% surveyed)

4. RCPNA additionally recommends:

- A. 'a' Overlay/Housing Opportunity Overlay Zone applied to Low Density Residential properties a distance of no more than 300' from NE Sandy Blvd. (current high frequency transit <https://trimet.org/schedules/frequent-service.htm>), the 60<sup>th</sup> Ave. Max Station, and the Hollywood Town Center, as defined by the adopted 2035 Urban Design Framework map, Figure 3-1, p. 29 Chapter 3 Urban Form (<https://www.portlandoregon.gov/bps/article/579166>);
- B. Removal of all proposed R5 to R2.5 rezoning for historically platted narrow lots;
- C. Increased allowed off-street parking options for Low Density Residential zone including off-street parking pads and front-loading garages for skinny lots.

(Supported by 69% surveyed)

It is our hope that you will honor our request for a 6+ month Extension for public comment on the RIP Discussion Draft to allow a healthy public discourse on this proposal. We propose the RCPNA's additional recommendations will serve as a basis for our neighborhood dialogue with the City as we, together, move forward with this proposal. The vast majority of the 135 RCPNA residents and business owners surveyed support this RCPNA decision based on our SurveyMonkey results. In addition, over 15 participants at the Nov. 16<sup>th</sup> LU & TC meeting had not been aware of this neighborhood survey and voted in support of our final decision.

Thank you for your time and consideration. Please let me know if you have any questions or I can be of further assistance.

Respectfully,



Tamara DeRidder, AICP  
Chairwoman, RCPNA  
Chair, LU & TC  
1707 NE 52<sup>nd</sup> Ave.  
Portland, OR 97213

Attached:

Exhibit A – Draft Minutes Nov. 16, 2017 RCPNA Land Use & Transportation Committee  
Exhibit B – Nov.16 LU & TC PowerPoint Presentation on RCPNA Survey Results

Please note: The RCPNA Charter designates the Land Use & Transportation Committee (LU & TC) the final authority for RCPNA regarding land use actions and policies when the deadline is time sensitive, meaning that it occurs prior to the next scheduled Board meeting. This Recommendation serves as the final recommendation on the RIP Discussion Draft based on the Nov. 30<sup>th</sup> deadline.

Land Use & Transportation Committee  
Rose City Park Neighborhood Association  
Draft Meeting Minutes  
November 16, 2017

Meeting Called to Order at 7 p.m. Owen Blank/Albina Head Start multipurpose room, 909 NE 52<sup>nd</sup> Avenue.

Attending: Tamara DeRidder, Ed Gorman, Sharron Fuchs, Terry Parker, Kelly Davis, Barb Brunkow, Tony Ardizzone  
Michael C. Harpok, Ron Katz, Susan Katz, Jeff Dennis, Cliff Fairley, Mary Anne Fairley, Larry Vinton, Wanda Vinton, Jeff Shoemaker, Patsy Lee, Mary Ellen Davenport, Justin Watson, Marion Cary, Eileen Carney, Jennifer Santhouse, Monica Monroe, Dawn Martinez, Anna Johnson, Linda Tinkham, Helene Farnen, Roger Farnen, Cole Miller (KOIN 6)

Approval of LUTC 10/19/17 minutes tabled since Ardizzone did not receive a copy. Waiting for his response to his recorded comments regarding the Lady of LaVang Committee. Ardizzone requested that his name be added to the LUTC mailing list.

Gorman asked Ardizzone to take minutes. Ardizzone requested that if anyone wanted something specific entered into the record they should give him name and comments.

Gorman reported on CNN's LUTOP  
comments by Gorman

- 1<sup>st</sup> hour was a PBOT tabling activity geared toward assessing Coalition interest in a High Traffic Safety Upgrade project on Sandy from Hollywood to I-205. Level of expressed interest was high and PBOT's Zef Wagner will work to develop a funding project to present for approval. If approved then more workshops will be held to determine the details of project upgrades
- comments by Parker  
Fuchs reported on Safety, traffic issues on Sandy Blvd. discussed

Gorman reported conversation with Nan Starks about RIP. Fuchs mentioned that no weight was being given to Central NE Neighbors and neighborhood associations previous work and submittals last year regarding RIP. The inquiry was originally posed by LUTOP chair Doug Fasching. Gorman asked Nan Stark concerning the rent raise issue and what are the checks in the system to prevent abuse. Nan said it will be up to the Portland Housing Bureau to provide Oversight. Sandra Lefrancois of CNN asked if the group should invite Portland Housing Bureau to come talk to CNN at the January meeting. Response was affirmative.

Gorman reported on Lady of LaVang Committee. The church has 5K members. Issues discussed at recent meeting (Nov. 14) included noise at summer events, parking non-compliance, congestion 2 ½ blocks from church. Attending Nov. 14 meeting were two representatives from PBOT (Carl Snyder, Traffic Operations Engineer/ Donald Hunter, Parking Enforcement), invited neighbors, and pastors from

nearby churches, one of which was Saint Rose (Fr. Ansgar Pham; Fr. Matt Libra). It was decided that the parking education process would involve Lady of LaVang sermons at Sunday masses. Consensus was that parking enforcement should be ratcheted up. Begin giving out tickets. Gorman stressed this would be all inclusive, including traffic from those attending Mass at Saint Rose. Our Lady of LaVang will explore personnel to become certified flaggers to direct traffic. Whether certified flaggers are provided or not, the Our Lady of La Vang/Rose City Park Neighbors Committee will work with Carl Snyder to develop a Traffic Flow Management Plan in the area of the church.

Gorman reported on the Baerlic Brewing project. He presented a brief history and said that the owners told him they were working through the permit process and hope to open in January.

Parker talked briefly about the issue regarding the Ellington Apartments. He was told that this was a Madison South problem.

Parker reported that PBOT will announce status of grant applications after the first of the month. He briefly described the proposed lights on 60<sup>th</sup> and Halsey proposal. He reported that new sidewalks were being planned to run from Halsey down to 60<sup>th</sup> Avenue MAX station. Entire area around MAX station is up-zoned. Fuchs then spoke about past neighborhood efforts to resist upzoning.

Gorman began PowerPoint presentation regarding RIP

Fuchs praised DeRidder's impressive work and expertise and said entire neighborhood should be grateful she is chair of neighborhood association, that other neighborhoods aren't half as lucky as we are.

Report on RCPNA Neighborhood (SurveyMonkey) Survey on the RIP Discussion Draft, developed by Tamara DeRidder.

135 total respondents

- 84% reject RIP Discussion Draft(DD) "a" Overlay rezoning
- 83% reject DD Rezone of Historically Skinny Lots from R5 to R2.5
- 72% reject off street parking limits for skinny lots
- 69% support RCPNA proposed 300 foot 'a' Overlay extended from NE Sandy Blvd. and Hollywood Town Center.
- 86%-support extension-of the deadline for public comment on the RIP Discussion Draft.

DeRidder then went through LUTC's Oct.19<sup>th</sup> Tentative RIP Recommendations that had been included in this survey. Ardizzone moved that they be approved. Parker seconded the motion. Lengthy discussion then ensued.

During discussion DeRidder urged that everyone's testimony on the RIP Discussion Draft be sent to all Planning and Sustainability commissioners [psc@portlandoregon.gov](mailto:psc@portlandoregon.gov) since, apparently, comments sent to the link would go to

BPS and be read and filtered (euphemism) by the BPS before being passed on to others for their consideration.

During discussion Sharron Fuchs presented her view of Morgan Tracey's response at the Roseway Neighborhood Association meeting of November 14, 2017, to Larry Vinton's question regarding his rights as a home owner and his perception that since he purchased his home, currently zoned R5, it should remain zoned R5. Mr. Vinton also stated he was not against zoning. Morgan Tracey responded that zoning didn't give you rights to be exclusionary and now with a rezoning people who buy in the area will know exactly what the zoning is when they purchase and now won't be surprised when a skinny house goes up next door to them. Sharron felt that Mr. Tracey was both disrespectful and dismissive of Mr. Vinton's questions and concerns.

During discussion Ardizzone noted that given BPS's apparent concern with rezoned areas being no more than 300 feet from high-frequency transit, even if the bus line on 57<sup>th</sup> is counted as high-frequency transit the current block of homes slated to be rezoned from R5 to R2.5 extends over 600 feet from 57<sup>th</sup>. (East side of 57<sup>th</sup> to west side of 60<sup>th</sup> ) He was asked to tell the group that at the October Drop-In session at CNN s Tracey seemed to think this area lay between two bus lines, apparently not understanding that the 60<sup>th</sup> Avenue bus line veers west at Halsey and then runs up 57<sup>th</sup>. Ardizzone related that when he asked Tracey why that specific area of RCP was schedule to be rezoned Tracey responded by saying that BPS could have recommended the entire area of Historically Narrow Lots (57<sup>th</sup> to 62<sup>nd</sup>, stopping at the Rose City Park)could be scheduled for R2.5 zoning. Ardizzone also related that when he asked Tracey why the west side of 57<sup>th</sup> wasn't scheduled to be rezoned to R2.5 Tracey said it was because that side of the street had alleys. Several in attendance said that street has only two alleyways.

During discussion, Vinton suggested that item A under #4 (additional recommendations) be deleted since the recommendation seemed to be sacrificing some of our neighbors (those living within 300 feet of Sandy Blvd.). He suggested we stand hard and fast against any rezoning of RCP. He was told that the recently adopted 2035 Comprehensive Plan had already expected the neighborhood to have an overlay area and here we were defining it for them. Some discussion then about changes to Sandy Blvd. Vinton reported that he handed out copies of his written responses to RIP and offered them to anyone interested. Fuchs thanked him and his wife Wanda for going door-to-door throughout the proposed R5 to R2.5 rezoned area to alert his neighbors about RIP. Several others joined her in their thanks to the Vintons.

Question was called and the meeting proceeded to vote on the motions based on the RIP Discussion Draft.

#1 (Reject the RIP Discussion Draft proposing "a" Overlay for all Low Density Residential Properties based on A. B. C. PASSED

#2 (Reject proposed Rezone of Historically Skinny Lots from R5 to R2.5, based on A. B. C. PASSED WITH FOLLOWING FRIENDLY AMENDMENTS:

Adding to C:

- Does not transition from high to low density;
- Does not match historic pattern of the lots;
- Does not provide access to high-frequency transit and services, such as grocery stores; and
- Raises the question of legality, what right does BPS have to rezone property without the consent of the owner(s)?

#3 Reject limitation on allowed off-street parking and garages for narrow lots. The Proposed Draft restricts parking to front loading and access from alleys. PASSED

#4 RCPA additionally recommends A. B. C. PASSED WITH FOLLOWING FRIENDLY AMENDMENTS:

- add to A: specify Sandy Boulevard (Parker amendment)
- add to C: add front-loading garages

Meeting adjourned 9:15 pm

# RCPNA Residential Infill Project (RIP) 2017 Questionnaire

Responses opened from Thursday November  
2nd until Wednesday November 15, 2017

# 135

**Total Responses**

Date Created: Sunday, October 29, 2017

Complete Responses: 135

# Proposed "a" Overlay Impacts All Inner East Residential Neighborhoods

## Legend

 Proposed new 'a' overlay zone (Additional Housing Opportunity overlay zone)

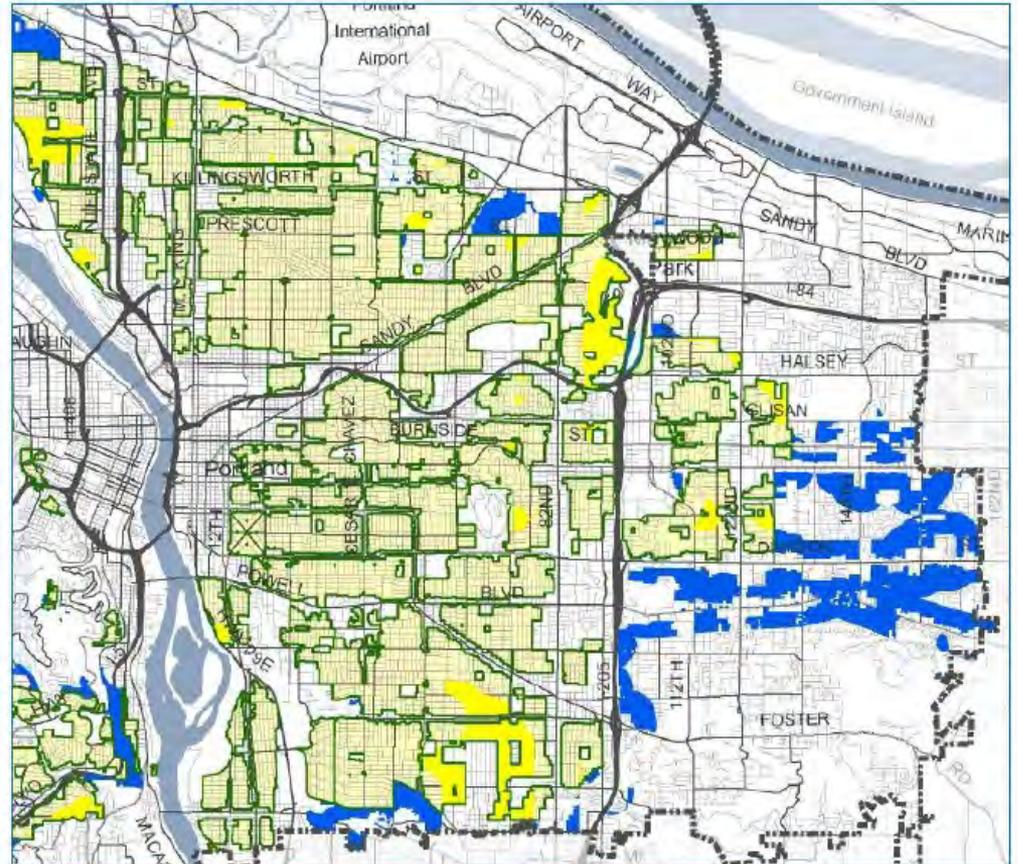
 R2.5, R5, R7 zoned properties subtracted from the 'a' overlay (originally in Concept Boundary)

 R2.5, R5, R7 zoned properties added to the 'a' overlay (not originally in Concept Boundary)

 City Boundary

R5 = 5,000 sq. ft. typical sized lot

R2.5 = 2,500 sq. ft. typical sized lot

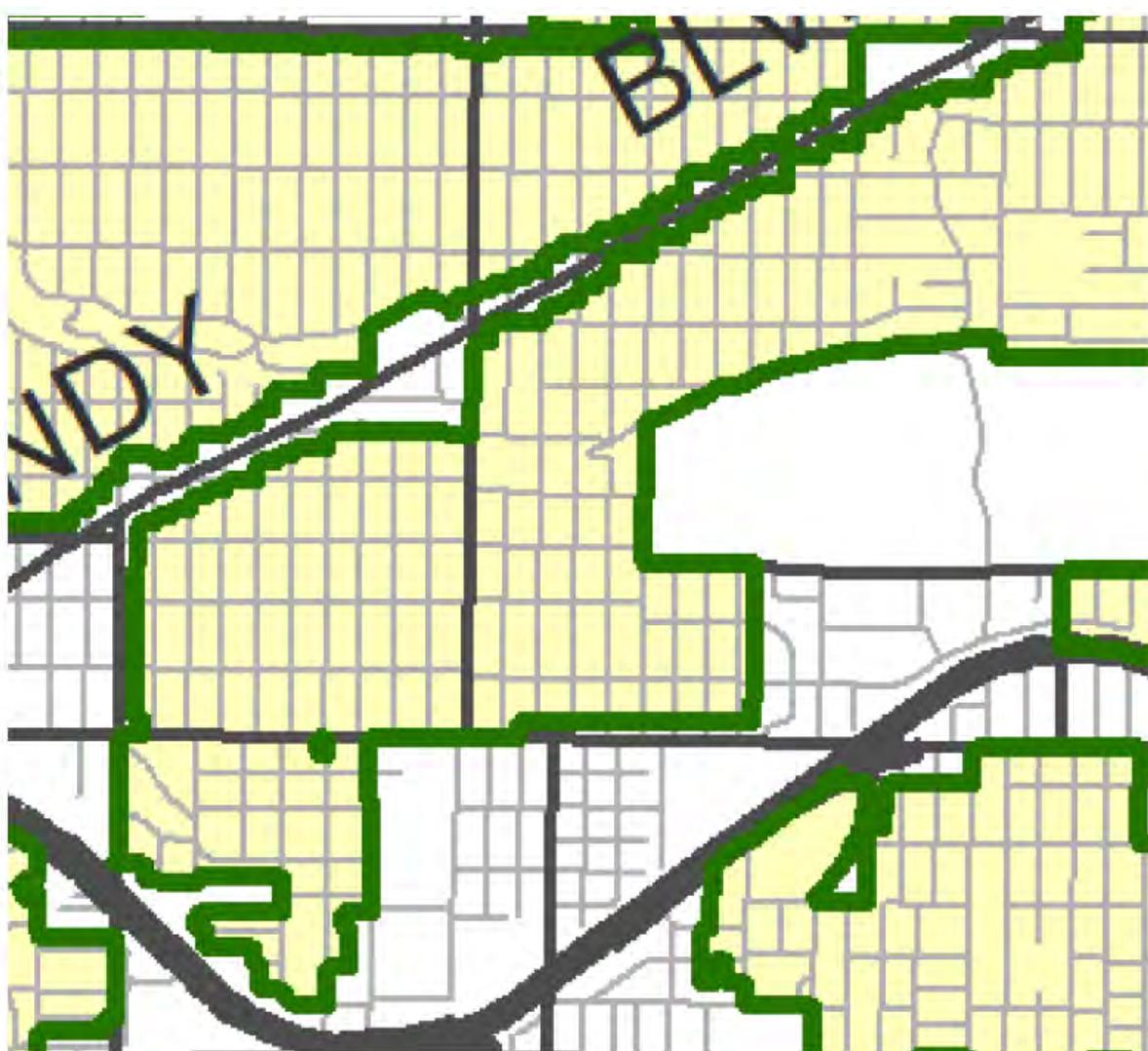


# Proposed R5/R2.5 with “a” Overlay

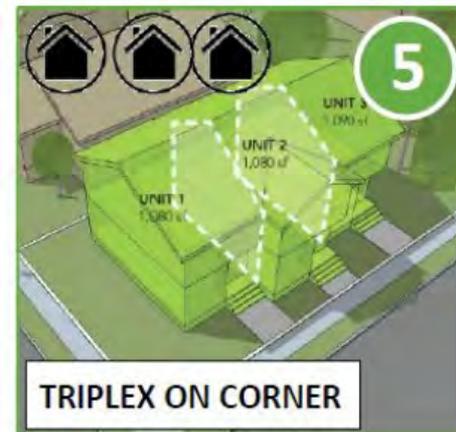
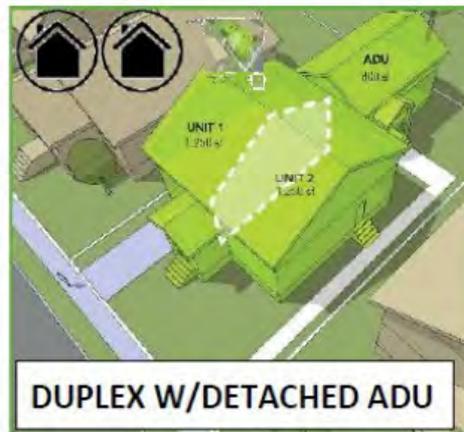
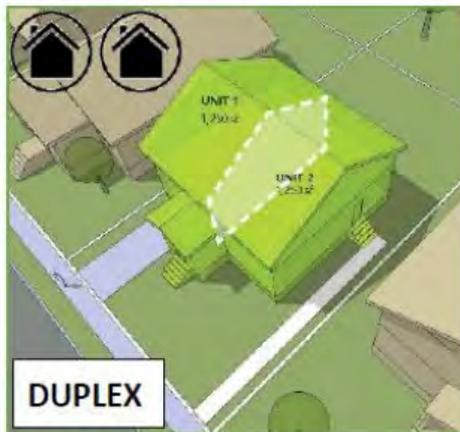
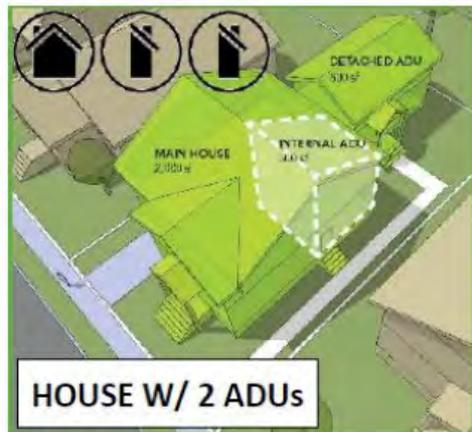
All Low Density Properties  
(R5 & R2.5 zones) allow up  
to 4-units per property:

- Duplexes with 2  
Accessory Dwelling Units\*
- Triplexes on corner lots  
With detached ADU\*

\*If all units priced at or below 80%  
of Median Family Income



# Proposed R5 Infill Potential = 'a' Overlay

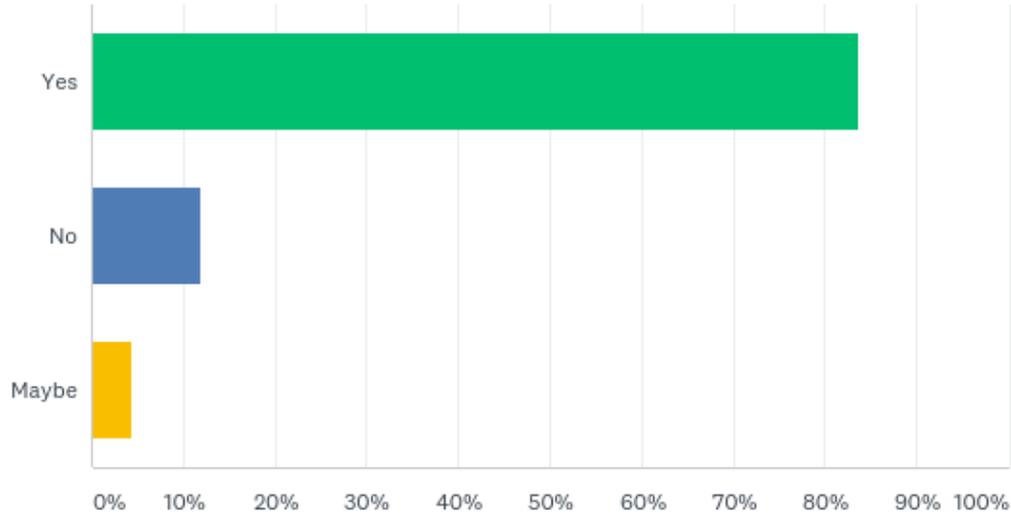


*Lots in the new 'a' overlay would be allowed these additional housing types, provided they meet minimum lot size requirements.*

**+ 1 Bonus Unit allowed if all units are affordable (up to 80% Median Family Income)**

# Q1: Do you support RCPNA in rejecting the City proposed Residential Infill Project(RIP) 'a' Overlay?

Answered: 135 Skipped: 0



# Q1: Do you support RCPNA in rejecting the City proposed Residential Infill Project(RIP) 'a' Overlay?

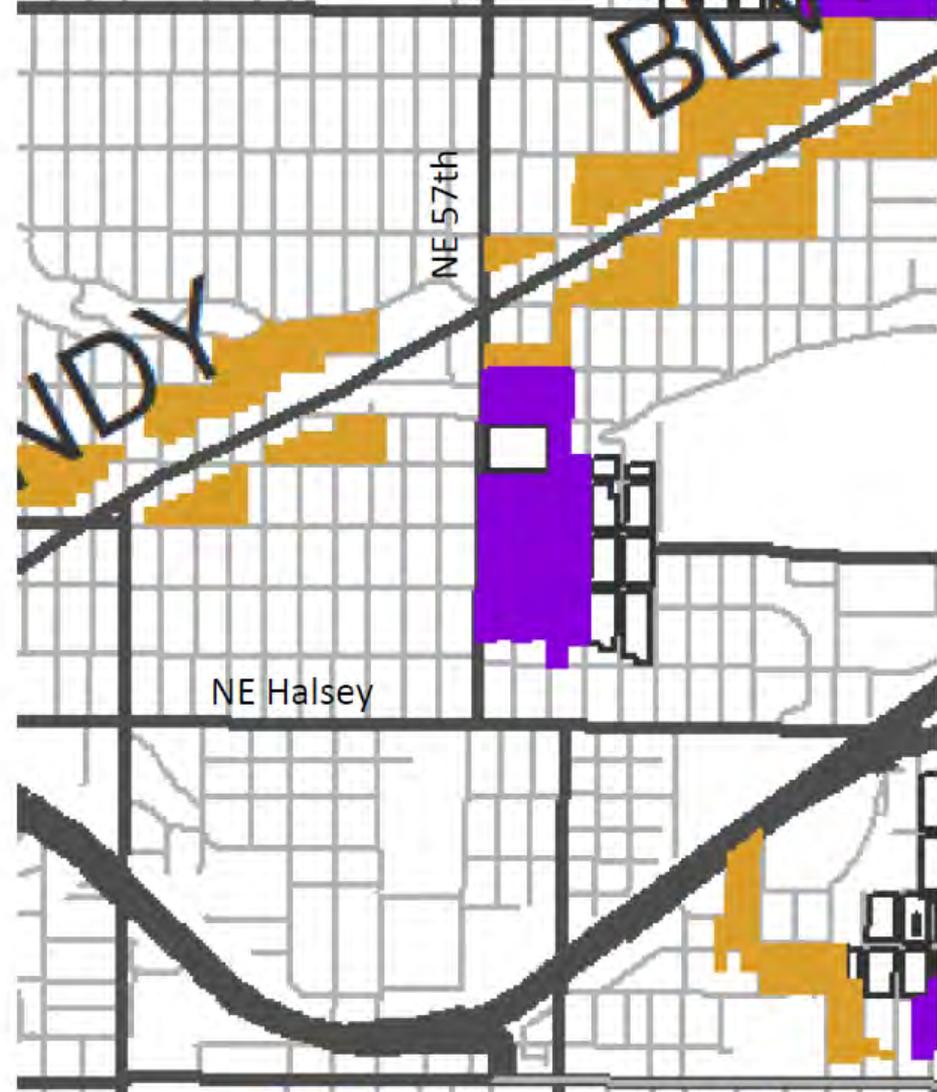
Answered: 135 Skipped: 0

ANSWER CHOICES	RESPONSES	
Yes	83.70%	113
No	11.85%	16
Maybe	4.44%	6
TOTAL		135

# Proposed Rezone R5 properties to R2.5

## Legend

-  Existing R2.5 zoning
-  Proposed R2.5 Comprehensive Plan Map and Zoning Map
-  Concentrations of R5 Historically Narrow Lots
-  City Boundary



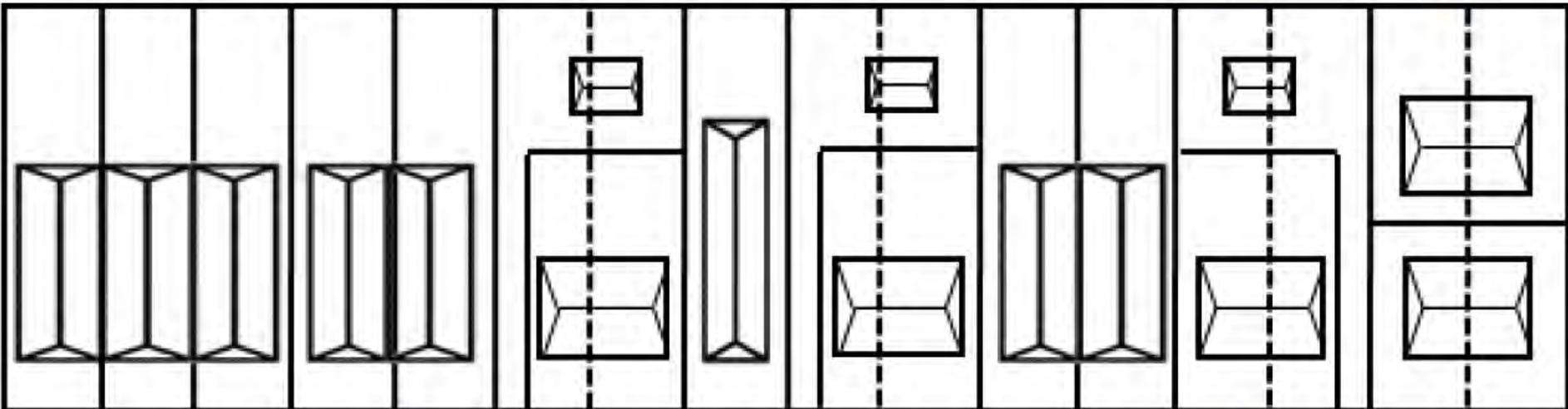
# Proposed Rezone of Existing Historically Narrow Lots

**R2.5 (typically 2,500 sq. ft. lots) rezoned from R5 (typically 5,000 sq. ft. lots) propose infill potential:**

- **Areas rezoned to R2.5 will have more infill site design options:**
  - **Attached houses will be required**
  - **Flag lots will be allowed through property line adjustments**
  - **Stand-alone lots can be built**
  - **Corner lots can rotate property lines for detached houses on wider lots**
- **Focused analysis used to identify lots very close to centers, parks, schools and other community amenities; identify infrastructure and environmental constraints; and create consistent zoning extensions and patterns of development.**

# Proposed 2.5 Infill Potential

Lot Line Adjustment  
Creates Options



Common Wall Houses  
= Town or Row Houses

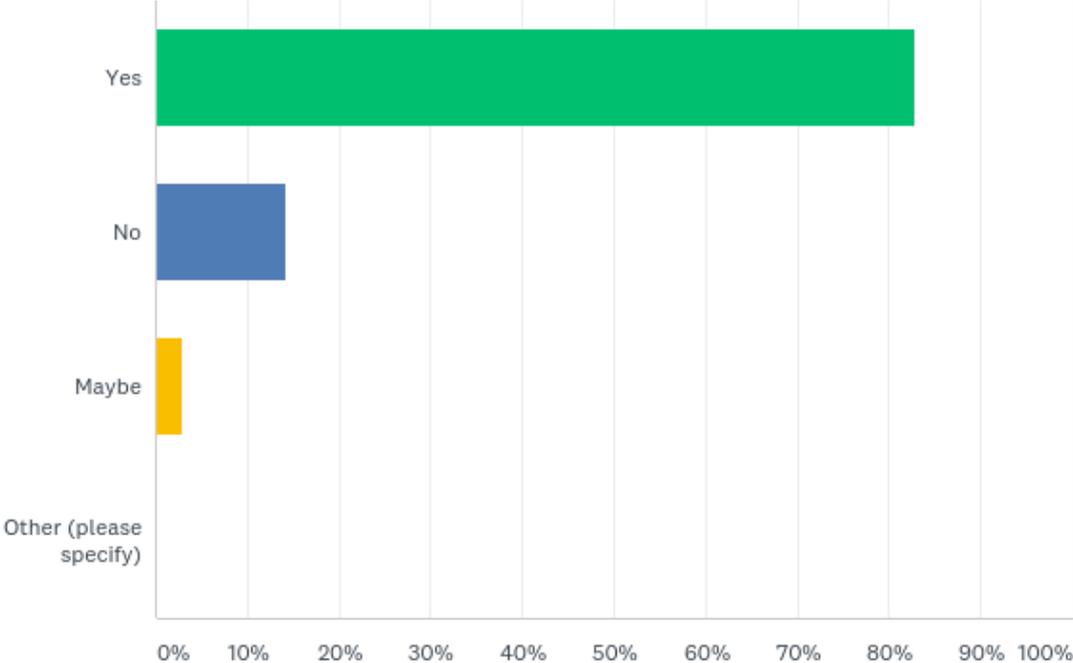
Flag Lot

Corner Lots

Historically Platted  
Skinny Property Lines

# Q2: Do you support RCPNA in rejecting the rezone of Historically Skinny Lots from R5 (5,000 sq. ft) to R2.5 (2,500 sq. ft)?

Answered: 134 Skipped: 1



## Q2: Do you support RCPNA in rejecting the rezone of Historically Skinny Lots from R5 (5,000 sq. ft) to R2.5 (2,500 sq. ft)?

Answered: 134 Skipped: 1

ANSWER CHOICES	RESPONSES	
Yes	82.84%	111
No	14.18%	19
Maybe	2.99%	4
Other (please specify)	0.00%	0
TOTAL		134

# Proposed Revise Parking Rules: For All Narrow Lots

**Affects R2.5 and any R5 zoned properties less than 36 feet wide**

- Allow, but don't require, parking on narrow lots.
- Continue disallowing at-grade garages on attached and detached houses less than 22 feet wide, but allow tuck-under garages on all attached houses.
- On a lot abutting an alley, require access from the alley when parking is proposed.



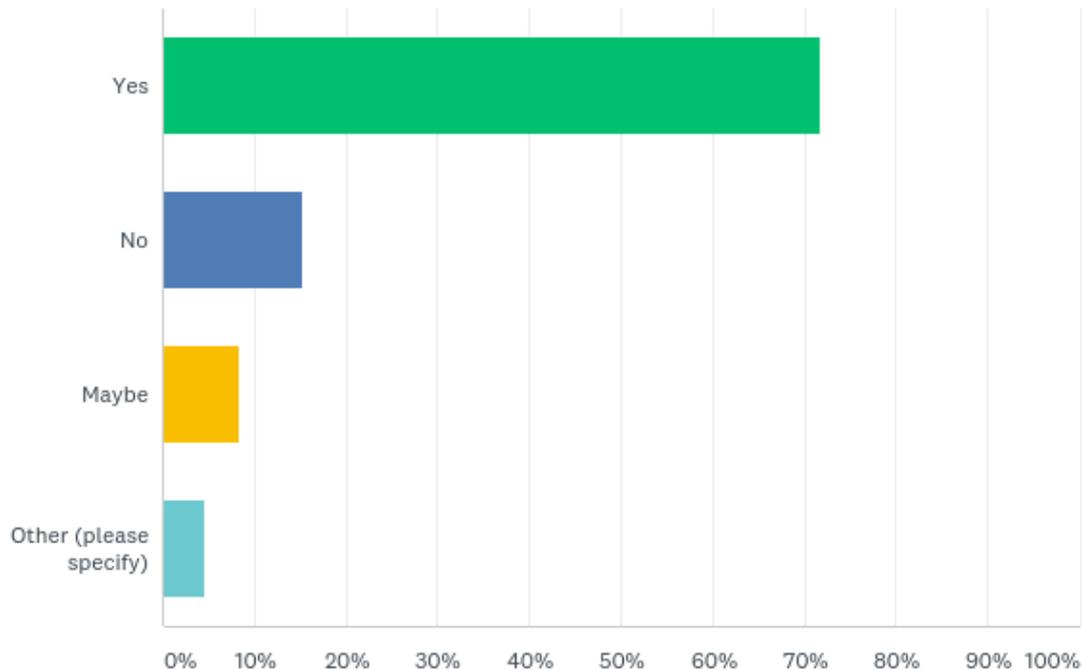
*Detached "skinny" houses with street-facing garages would not be allowed.*



*Wider houses (22 feet or wider) would be allowed to have a garage.*

### Q3: Do you support RCPNA in recommending no limitations to allowed off-street parking for skinny lots up to 36-feet wide?

Answered: 131 Skipped: 4

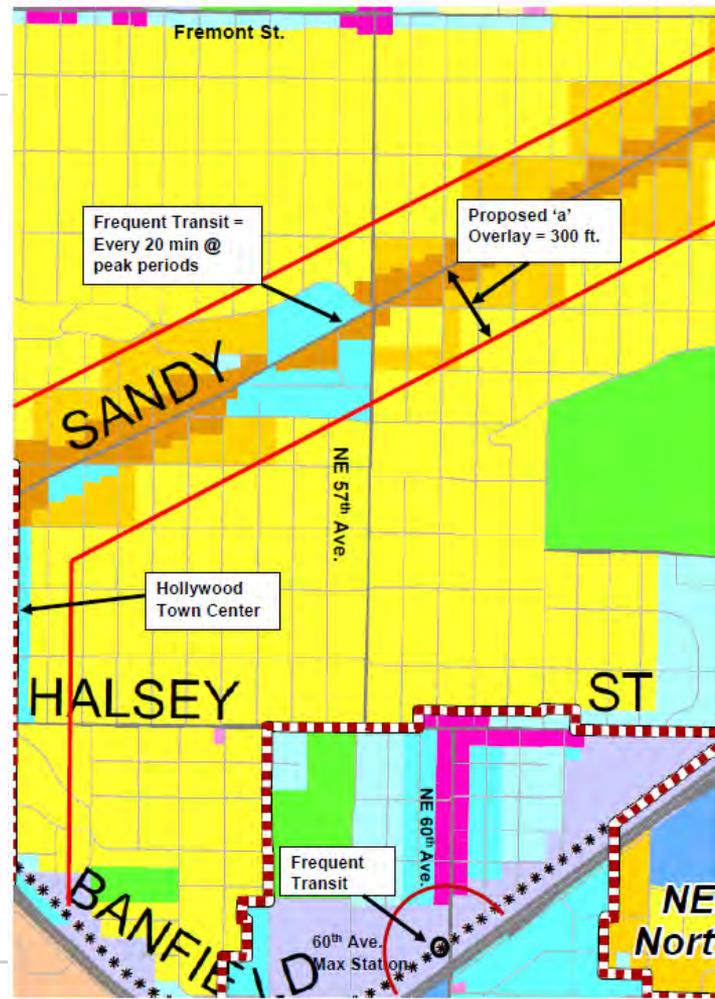


### Q3: Do you support RCPNA in recommending no limitations to allowed off-street parking for skinny lots up to 36-feet wide?

Answered: 131 Skipped: 4

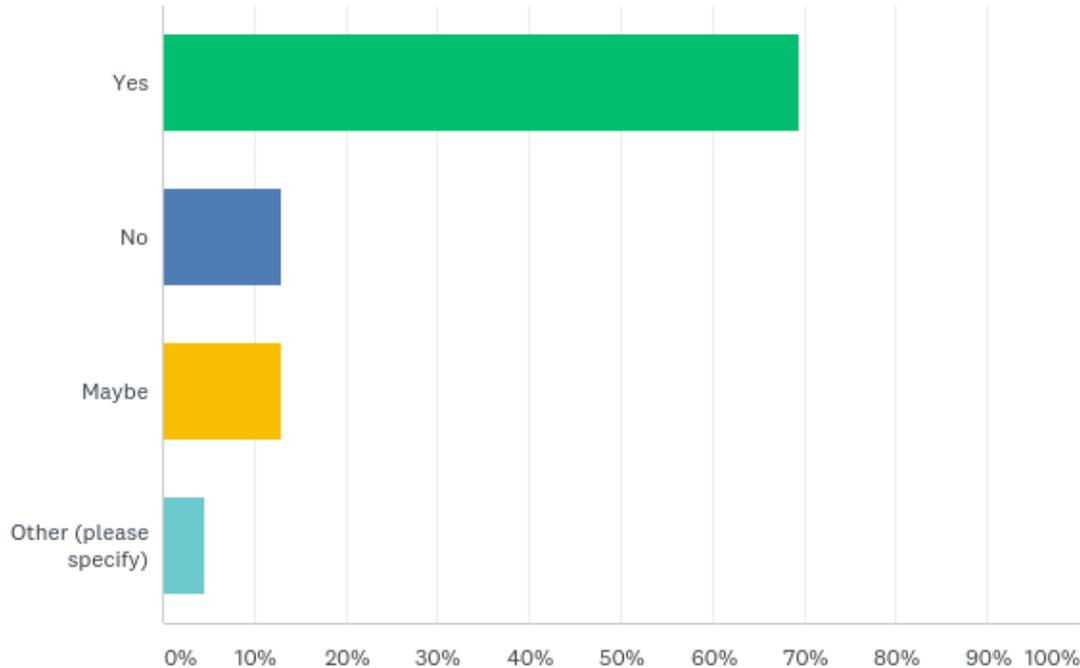
ANSWER CHOICES	RESPONSES	
Yes	71.76%	94
No	15.27%	20
Maybe	8.40%	11
Other (please specify)	4.58%	6
TOTAL		131

RCPNA Tentative Recommendation on RIP Discussion Draft  
Proposed 'a' Overlay



# Only to Single Zoned properties located within 500-feet of current Frequent Transit bus lines, Max Stations, and Town and Regional Centers?

Answered: 131 Skipped: 4



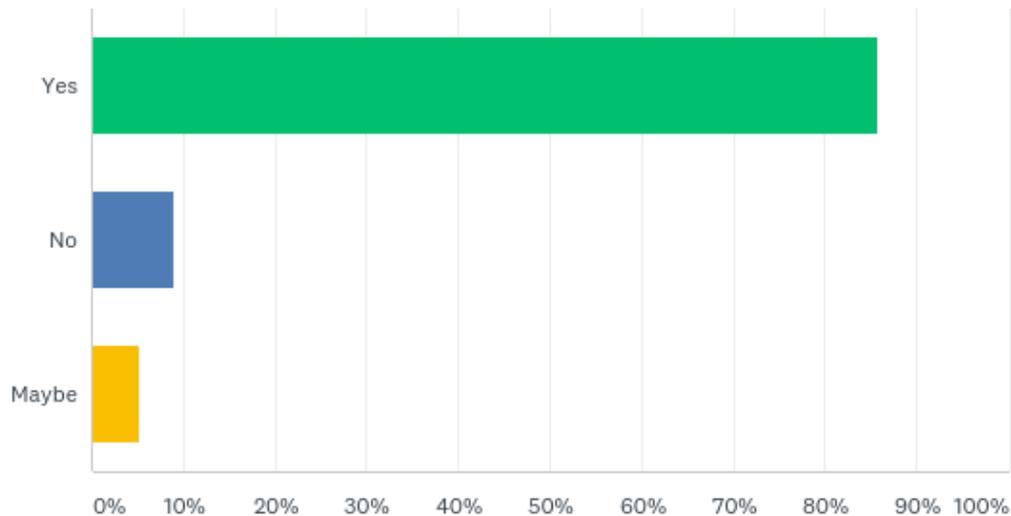
# Only to Single Dwelling zoned properties located within 500-feet of current Frequent Transit bus lines, Max Stations, and Town and Regional Centers?

Answered: 131 Skipped: 4

ANSWER CHOICES	RESPONSES	
Yes	69.47%	91
No	12.98%	17
Maybe	12.98%	17
Other (please specify)	4.58%	6
TOTAL		131

## Q5: Do you support RCPNA asking for an "Extension" of the Nov. 20th Discussion Draft comment deadline?

Answered: 134 Skipped: 1



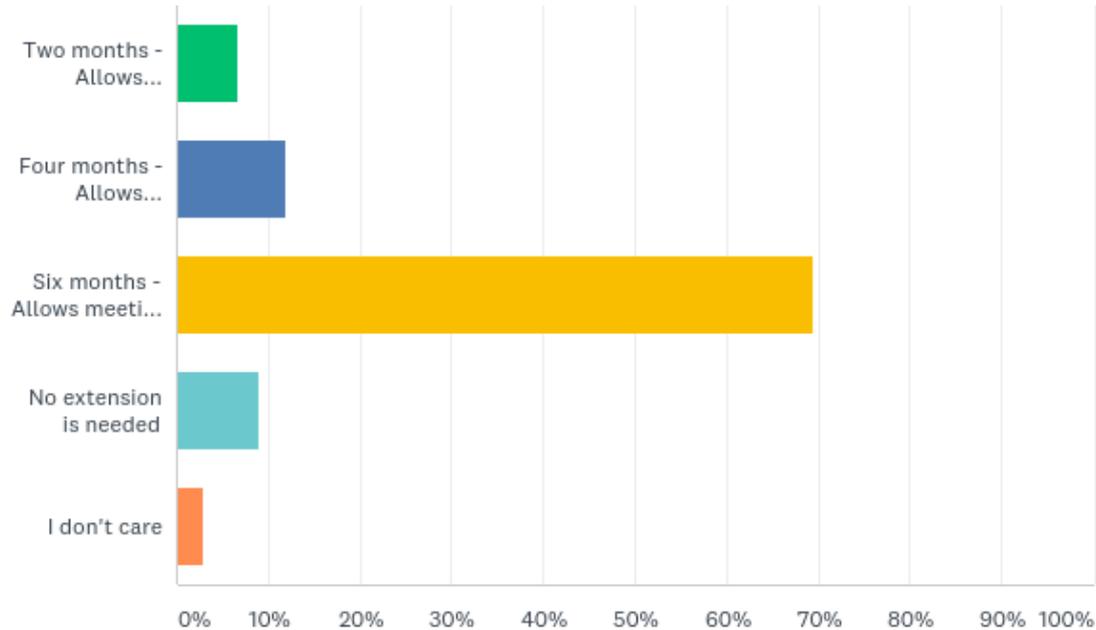
## Q5: Do you support RCPNA asking for an "Extension" of the Nov. 20th Discussion Draft comment deadline?

Answered: 134 Skipped: 1

ANSWER CHOICES	RESPONSES	
Yes	85.82%	115
No	8.96%	12
Maybe	5.22%	7
TOTAL		134

## Q6: If an "Extension" to this deadline is requested which of the following indicates the extent of time needed?

Answered: 134 Skipped: 1



## Q6: If an "Extension" to this deadline is requested which of the following indicates the extent of time needed?

Answered: 134 Skipped: 1

ANSWER CHOICES	RESPONSES	
Two months - Allows neighborhoods to meet at least once on the topic with proper notice from City	6.72%	9
Four months - Allows neighborhoods and neighborhood coalitions to meet at least once with proper notice from the City	11.94%	16
Six months - Allows meeting time for neighborhoods and coalitions while allowing time for the Bureau of Planning and Sustainability (BPS) to make presentations to each of the 7 neighborhood coalitions.	69.40%	93
No extension is needed	8.96%	12
I don't care	2.99%	4
<b>TOTAL</b>		<b>134</b>

No Question  
Posed

# Proposed Limit House Sizes while Maintaining Flexibility

- Establish a limit on house size by zone that is proportional to lot size
- Exclude attics with low ceilings and basements from house limits
- Allow an additional 0.15 floor area ratio(FAR) for detached accessory structures

<u>Code</u>	R5 – 5,000 square foot lot	R2.5 – 2,500 square foot lot
Current	6,750 sf (1.35 to 1 FAR) **	4,375 (1.75 to 1 FAR)
Proposed	2,500 (0.5 to 1 FAR) + 750 sf detached structure	1,750 (0.7 to 1 FAR) + 375 sf detached structure

\*\* Note: Floor Area Ratio (FAR) example 6,750 sq.ft. floor area divided by (/) 5,000 sq.ft. lot area = 1.35 to 1 FAR

# RCPNA Board Meeting Tues. November 7th

Unanimously approved the recommendation:

**“Request a 6-month Extension to the Nov. 30<sup>th</sup>, 2017, comment deadline for the City of Portland RIP Discussion Draft”**

# Our Land Use & Transportation Committee (LU & TC) Tentative Recommendation

Thurs. Nov. 16<sup>th</sup> the LU & TC public meeting at the Head Start School, 909 NE 52<sup>nd</sup> Ave., from 7-9 pm includes review questionnaire results and propose a Final Recommendation.

The LU & TC tentative recommendation is as follows:

1. **Reject the RIP Discussion Draft proposing "a" Overlay for all Low Density Residential Properties, based on:**
  - A. Impact on existing neighborhoods too excessive. Will spur additional demolition of existing homes by developers in order to create higher density and increased cost housing/square foot;
  - B. 'Centers' shown for use in 'a' Overlay(p.45 of <https://www.portlandoregon.gov/bps/article/657688>) conflicts with 'Centers' in adopted 2035 Urban Design Framework map, Figure 3-1, p. 29 Chapter 3 Urban Form (<https://www.portlandoregon.gov/bps/article/579166>). Proposal wrongly identifies 60th St. Station Area as a 'Center' from which properties within a 1/4 mi. radius from its edge are included in the 'a' Overlay
  - C. Fails to comply with City Council's 12/09/16 RIP direction, "Council did not vote on the conceptual boundary criteria for the Housing Opportunity Overlay Zone. Rather commissioners asked staff to come back early next year with mapping options." BDS has failed to provide Housing Opportunity Overlay Zone/'a' Overlay mapping options.

# Our Land Use & Transportation Committee (LU & TC) Tentative Recommendation (*cont.*)

## 2. **Reject proposed Rezone of Historically Platted Skinny Lots from R5 to R2.5, based on:**

- A. Reverses the City Council direction on RIP final hearing, 12/09/16 where the record states: "Council did not approve staff's recommendation to rezone historically narrow lots currently R5 zones to R2.5....Instead, Commissioners voted for an amendment that would not allow individual R5-zoned historically narrow lots to be developed - even when they have been vacant for more than five years, as presently allowed."
- B. Promotes demolition of existing homes in R5 zone where developers will remove existing structures in favor of constructing higher density housing on two historically narrow lots. City Council Dec. 2016 RIP decision states, "To encourage internal conversions over demolition...".
- C. Promotes spot zoning inconsistent with maintaining historic neighborhood fabric of housing.

# Our Land Use & Transportation Committee (LU & TC) Tentative Recommendation (*cont.*)

3. Reject limitation on allowed off-street parking for narrow lots since this will only increase on-street parking use. The Proposed Draft restricts allowing at grade parking, including front loading garages.
4. RCPNA additionally recommends:
  - A. 'a' Overlay/Housing Opportunity Overlay Zone applied to Low Density Residential properties a distance of no more than 300' from current high TriMet frequency transit(<https://trimet.org/schedules/frequent-service.htm>), Max Stations, and Centers, as defined by the adopted 2035 Urban Design Framework map, Figure 3-1, p. 29 Chapter 3 Urban Form (<https://www.portlandoregon.gov/bps/article/579166>) excluding Neighborhood & Station Area Centers;
  - B. Removal of all proposed R5 to R2.5 rezoning for historically platted narrow lots;
  - C. Allowance of off-street parking options for Low Density Residential including off-street parking pads.

## City of Portland Bureau of Planning and Sustainability (BPS)

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BPS recently extended the deadline for public comments to the RIP Discussion Draft to 5:00 pm on Thursday November 30, 2017, See: <https://www.portlandoregon.gov/bps/67728>

RCPNA LU & TC has the authority by Charter to render a decision on behalf of RCPNA when the item in question is time sensitive and does not allow the Board the opportunity to review the proposal. This is the case with the RIP Discussion Draft.

### LU & TC Possible Actions Include:

- Forwarding the RCPNA Board recommended 6-mo extension, only;
- Recommending approval of the Oct. 19<sup>th</sup> Tentative Recommendations (possibly amended) together with the 6-month extension request;
- Bullet #2 with questionnaire summary.
- No Action

*Thank You for Your Participation*

Tamara DeRidder, AICP  
Principal, TDR & Associates



30 November 2017

City of Portland Bureau of Planning  
Attn: RIP  
1900 S.W. Fourth Ave., Suite 7100  
Portland, OR 97201

To Whom It May Concern:

The Roseway Neighborhood Association thanks Julia Gisler and Morgan Tracy for coming to our regularly scheduled meeting on Tuesday, November 14, to present the discussion draft of the Residential Infill Project (RIP).

The presentation focused on how the RIP would change the current zoning and allowed uses of historically narrow lots, while questions and concerns raised by neighbors touched on this and other aspects of the RIP.

**Though the board of the Roseway Neighborhood Association has yet to take a position on the RIP, we write with the following concern: Will the RIP lead to the displacement of economically vulnerable Roseway residents? How might this be avoided?**

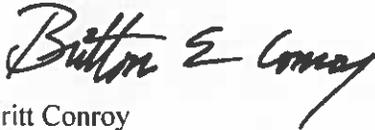
We are concerned about the projected displacement identified by planners in Volume I of the RIP proposal (pp. 44-48). Roseway contains many modest-sized, viable, and relatively affordable homes straddling historic lot lines. We are concerned rezoning could see residents priced out of the neighborhood in the wake of new development.

To avoid displacement, City planners in the discussion draft propose to exempt from the RIP areas of several other neighborhoods, including the adjoining Cully neighborhood. We understand that the City's analysis found a smaller proportion of economically vulnerable households in Roseway than areas the City has proposed to exempt. That said, how can we prevent the displacement of our economically vulnerable Roseway neighbors?

Additionally, for the public record, we include below the concerns of those who attended the meeting.

We thank Ms. Gilser and Mr. Tracy for their time, and we look forward to engaging our neighbors in the RIP process and other important discussions of housing affordability.

Sincerely,



Britt Conroy  
Chair, Roseway Neighborhood Association  
c/o Central Northeast Neighbors  
4415 NE 87th Ave.  
Portland, OR 97220

\*\*\*

**Comments made at the November 14, Roseway Neighborhood Association meeting**

We invited City of Portland representatives to our meeting to give our neighbors an opportunity to learn about the RIP. Because there was no formal means to record the questions and concerns aired at the meeting, we promised to submit to the City a list of concerns voiced by our neighbors.

Among the concerns voiced, meeting attendees worried that the RIP could lead to:

- More demand for on-street parking, including where traffic and parking are currently difficult;

- Loss of “naturally occurring affordable housing,” defined by an attendee as existing housing stock that is more affordable than what would likely be developed in its place;
- Roseway homes, most which are not subject to the City requirement they be deconstructed instead of demolished, being sent to a landfill instead of the materials being reused;
- Large new developments in back yards as part of flag-lot projects; and
- A decrease in the values of existing homes due to new zoning, what one attendee called a “theft of value” that would impact the largest investment made by many homeowners.

Additionally, concerns regarding the RIP policy development process included:

- A lack of clarity on size and number of new units that would be allowed per lot;
- A lack of analysis as to projected outcomes;
- Affordability not being addressed; and
- Whether the RIP process thus far has allowed the City to identify the best areas in the City to rezone from R5 to R2.5. Would those areas with historically narrow lots that City planners propose to rezone to a higher density be those deemed best to rezone if they did not contain historically narrow lots?

According to Mr. Tracy, roughly three-quarters of the Roseway neighborhood contains historically narrow lots. Roseway is not full of skinny houses, but rather houses that appear to sit on a typical Portland 50-foot-wide lot in fact were built long ago straddling two 25-foot-wide lots. The RIP discussion draft recommendations would impact every narrow lot in Roseway in one of two ways, either by no longer allowing an owner to tear down their house and replace it with two skinny houses, or in other areas of the neighborhood, by requiring new development on narrow lots to take the form of row houses, not detached homes.

However, as Mr. Tracy stated in his presentation, the City did not set about deciding where in the City broadly speaking it would be best, from a policy perspective, to place this denser development – such as along corridors or in centers, as in the Comprehensive Plan – but only evaluated the existing pockets of narrow lots for rezoning. Has this particular aspect of the RIP process been the best way to ensure Portland meets its housing affordability, mobility, climate, equity, displacement prevention and other goals?

# S·M·I·L·E

SELLWOOD MORELAND IMPROVEMENT LEAGUE  
8210 SE 13th AVENUE, PORTLAND, OR 97202  
STATION 503-234-3570 • CHURCH 503-233-1497

November 15, 2017

City of Portland Bureau of Planning and Sustainability  
Attn: Residential Infill Project  
1900 SW 4<sup>th</sup> Avenue, Suite 7100  
Portland, OR 97201

Residential Infill Project:

Our comments below are organized by the 12 main proposals in the Discussion Draft Report. These are followed by some comments on the proposed zoning code in volume 2.

## **Topic #1 - Scale of houses**

### **1. Limit the size of houses while maintaining flexibility**

We have reviewed the square footage limits and estimate that about one-quarter of the homes built in our neighborhood 2012-2016 exceed the proposed FAR limits, so the proposed limits appear to preserve existing building scale and continue to allow most construction to take place.

### **2. Revise how height is measured (all zones).**

We support measuring height from the lowest point near the building. The report does not justify why attached houses should have a 35 foot height limit in R2.5; it may be to allow a tuck under garage whether or not one is built, so we recommend a 30 foot height limit and a 5 foot height bonus for a tuck under garage. We support excluding small dormers from height measurements. We would be skeptical of modifications discussed at the October 16 Southeast Uplift Land Use meeting that include habitable projections above the height limits because it could be a loophole to allow a room above the height limit.

### **3. Improve front setbacks to better reflect those of adjacent houses (R7, R5 and R2.5 zones)**

In our neighborhood, most front yards setbacks are 15 feet or more so this proposal is consistent with existing conditions in our neighborhood and we support it. The proposal includes reasonable flexibility for cases where the existing front setback is less.

### **4. Improve building design (R10, R7, R5 and R2.5 zones).**

We support these proposals. Please consider the often ugly duplexes built ca. 1960s and ensure that they cannot be built under these new rules. Buildings should be in character with the neighborhood and built well.

## **Topic #2 - Housing Opportunity**

### **5. Create a new Additional Housing Opportunity overlay zone – the new ‘a’ overlay zone**

See proposal 6 comments below.

### **6. Apply the new ‘a’ overlay zone in select areas.**

The constraint criteria are limited to health and safety of building occupants and do not consider infrastructure or environmental impacts as stated in the summary sheet and staff report. Please correct the report. The City and Project should not increase density where the cumulative impact of increased density in all zones degrades schools, transportation, and other infrastructure beyond acceptable service levels. Since 2015 our neighborhood has built or is adding about 1,500 units, a 25% increase, that planners should consider. For example, the ongoing PBOT study of the effects of this Project should consider the effect of density increases in multi-dwelling zones proposed by the Better Housing by Design Project and continued by-right density increases in centers.

In our neighborhood, landslides along the Oaks Bottom Bluff are common and it is in the BDS Regulatory Landslide Area (portlandmaps, geologic hazards) but properties in the landslide zone are included in the new a overlay. For example, 1433 SE Reedway had a landslide that closed trails below for months and the house had to be moved 15 feet back from the bluff in 2014. It is in the proposed ‘a’ overlay but is obviously not a safe place for additional density. Please remove all properties in the BDS Regulatory Landslide Area along the Oaks Bottom Bluff from the proposed ‘a’ overlay due to risks for health and safety of building occupants. The aggregate constraint criteria state that another hazard is needed to remove these properties; a two-hazard policy seems to put building occupants at risk.

The application of hazard constraints appears to be inconsistent and more information would be helpful. The staff report states (page 40):

*With the help of an inter-bureau Technical Mapping Team, over 50 potential constraints were identified and evaluated. Many constraints were determined to have a negligible effect or were not relevant to the application of the proposed overlay, because the effect of the proposed provisions was no different than impacts from current zoning regulations. For example, earthquake hazards are the same for a structure regardless of whether it is a house, duplex or triplex.*

Floodplain is considered a constraint, but the hazard is the same for a structure regardless of whether it is a house, duplex, or triplex, like an earthquake, which is not a constraint. Please rewrite this paragraph to remove this inconsistency.

In addition, there is spatial variability in the risk of a given hazard: floods happen in floodplains and earthquake risk is greater in some areas than others (<https://pdx.maps.arcgis.com/apps/webappviewer/index.html?id=0aafd41ec7f845078162f0cdfec33b6>). This spatial variability should be considered and used to avoid placing additional density in extremely hazardous areas such as a 100-year floodplain or active landslide zone. Please add a table listing the potential constraints that were evaluated and why they were not included as a constraint.

## **7. Provide incentives for affordable housing and historic preservation (new ‘a’ overlay zone).**

The SMILE membership is composed of people who value preserving quality of life, walkability, and character of their charming neighborhood and who are concerned with costs and availability of housing in their popular neighborhood. There is general agreement on the principle that any increase in density should be dedicated to affordable housing and the SMILE Board of Directors has supported this position. The Project should try to dedicate any increase in zoned density to affordable housing.

The report should describe ways of providing affordable housing that were considered and why they were rejected. We recognize that it is difficult and perhaps impossible to feasibly enable an affordable housing unit in a three unit development, but there should be sufficient transparency so we know what was studied and will not work. We also recognize that addressing this problem is probably beyond the scope of this Project. Ways of providing some affordable housing could include

- Require the additional (third) unit to be affordable (as a bonus unit)
- Subsidize purchase of a duplex and owner occupancy of one unit if the second is an affordable rental.
- Subsidize ADUs only if they are used as affordable housing.
- Have short-term rentals subsidize affordable housing in the same neighborhood
- Dedicate tax revenue from the additional unit to provide affordable housing in the same neighborhood.

While we favor the concept of historical preservation, we are concerned that the historical preservation incentives could be used as a loophole to avoid other regulations and thus the incentives should be written to avoid this. For example, we have some 50-70 year old homes that do not contribute to the charm of our neighborhood: if their age qualifies them as historic, could an owner get it historical status and use the incentives to remodel in a way that would otherwise not be allowed?

We would like to see an incentive for duplex owners to occupy one of the units, perhaps for a first-time buyer where the other unit is an affordable rental unit. Property owners in owner occupied dwellings are more likely to contribute to the neighborhood than absentee owners. We are concerned that duplexes will be investment properties owned from afar and detached from the neighborhood.

#### **8. Encourage more cottage cluster development (all single-dwelling zones)**

We support encouraging more cottage cluster development.

#### **Topic #3: Narrow lots**

#### **9. Rezone some historically narrow lots from R5 to R2.5**

No comment.

#### **10. Revise rules for all narrow lots (less than 36 feet wide)**

We support the proposed rules for all narrow lots.

#### **11. Revise rules for parking and garages on all narrow lots (less than 36 feet wide)**

We support the proposed rules for parking and garages on narrow lots.

#### **12. Make improvements to the R2.5 zone**

In R2.5 zones a 30 foot height limit is proposed for detached homes and a 35 foot limit for attached homes with the extra height to allow for a tuck under garage which, however, is not required. We think there should be a 30 foot height limit in R2.5 and a 5 foot bonus for a tuck under garage.

Our neighborhood has about 868 R2.5 lots, 720 of which are 5000 square feet (sf) or larger and we are concerned that rules written assuming a 2,500 square foot lot will continue to allow large single unit buildings in our neighborhood. The new proposal to set the Floor Area Ratio (FAR)

of R2.5 properties to 0.7:1 would allow a 3,500 square foot house that would be oversized for our neighborhood to be built on 5,000 sf R2.5 lots. Thus, the R2.5 zone would become the McMansion zone with 3,500 sf houses and, if the lot is 5,000 sf or larger, one Accessory Dwelling Unit (ADU). To prevent oversized houses on R2.5 lots, we urge you to add that the maximum FAR per unit should be 0.5:1. This would limit individual units to be no larger than allowed in R5 and better utilize the R2.5 zone.

### **Other comments on the proposed zoning code**

The zoning code now requires entrances for corner duplexes on separate streets or a single entrance with two doors to give the building the appearance of a single family house. For corner triplexes apply standards similar to 33.110.270.E.4 for duplexes. One triplex entrance should face a different street than the others.

Maximum ADU size is 800 sf according to 33.205.040.C.3 but is 0.15 FAR elsewhere. We think it is supposed to be the smaller of 800 sf or 0.15 FAR. Clarify this in the code.

ADUs are not part of minimum or maximum density in SF zones (32.205.050, 'In the single-dwelling zones, accessory dwelling units are not included in the minimum or maximum density calculations for a site.), but this is incorrect for the R2.5 minimum density on 5000 sf and larger lots and within the a overlay. Correct this contradiction.

The proposed code for FAR is scattered and should have better cross-references. Section 33.110.215.B states "Maximum FAR standard. Maximum floor area ratios are stated in Table 110-3. Additional floor area is allowed for detached accessory structures. See 33.110.250.C.3." Section 33.405.050 "Accessory Dwelling Units, Duplexes and Triplexes" also states FAR maximums that include 0.15 for triplexes. So, in 33.110.215.B, the allowance for "additional floor area" should include "triplexes" and refer to 33.405.050.D.2.

These comments were approved by the SMILE Board of Directors November 15, 2017. If you have any questions, please contact David Schoellhamer, Chair of the SMILE Land Use Committee, at [chair.landuse.smile@gmail.com](mailto:chair.landuse.smile@gmail.com). Thank you for the opportunity to comment on the report.

Sincerely,



Joel Leib  
President, Sellwood-Moreland Improvement League



Date: November 26, 2017

To: City of Portland Bureau of Planning and Sustainability  
Attn: Residential Infill Project  
1900 SW Fourth Avenue, Suite 7100  
Portland, Oregon 97201  
Attn: Morgan Tracy, Project Manager  
CC: Mayor Ted Wheeler

From: South Burlingame Neighborhood Association  
c/o Southwest Neighborhoods, Inc.  
7688 SW Capitol Highway, Portland OR 97219  
sbna-president@swni.org  
Robert Lennox, President

**Re: RESIDENTIAL INFILL PROJECT DISCUSSION DRAFT PROPOSALS**

**INTRODUCTORY COMMENTS**

South Burlingame residents and the Neighborhood Association have followed the Residential Infill Project closely over these past many months. We have reviewed the Draft Proposal and this is our feedback. While we understand that BPS is looking for specific feedback on the RIP draft code proposals, we must begin with some general comments regarding their impact on our neighborhood.

The draft code fails to maintain neighborhood context and character. The proposed increases in density will reduce valued open space, mature trees, and solar access. All of these contribute to the neighborhood qualities that South Burlingame residents value.

The draft ignores Comprehensive Plan goals. It ignores portions of City Council's December 2016 direction. It appears to have been a mapping exercise designed to increase density. These have been done without analysis of affordability, the number and possible neighborhood shifts of demolitions, displacement of renters and other residents, neighborhood character, shifts away from home ownership to investor owned housing, and Infrastructure needs. Above all it eliminates the concept of single dwelling housing from huge swaths of our neighborhood and our city.

## **THE SOUTH BURLINGAME NEIGHBORHOOD**

South Burlingame is made up almost exclusively of single family homes. With tiny exceptions, the neighborhood is zoned R5. The neighborhood population is approximately 1750. There are approximately 825 housing units, 74 percent of which are owner occupied.

While the houses represent a range of style and age, most date from 1930 to 1970. Most houses are of modest size and are one to one-and-a-half stories in height.

## **SCALE**

The South Burlingame Neighborhood Association supports proposals which limit the size and appearance of homes, making them more compatible with their neighbors:

- The use of floor area ratio (FAR) to manage size.
- Measuring height from the lowest point of the house.
- Limiting the height of the main entry above ground level.
- Increasing front setbacks.
- Requiring articulation of the street facing façade.

However some of the proposal specifics will have negative effects on our neighborhood, and more generally across the city. They will not encourage affordability but will encourage demolitions and displacement in older neighborhoods of smaller homes such as South Burlingame.

To improve the outcomes for South Burlingame and other neighborhoods we request the following changes within the **R5 zone**:

- **Limit the Floor Area Ratio to 0.5 to 1.0, not to exceed 2500 sf in the R5 zone.**
- **Include basements less than six feet below grade and attic space with height of 80 inches in the FAR.** Not including basement and attic space will allow houses which could exceed 3500 square feet.
- **Increase minimum lot size to 4000 sf with 40 foot street frontage.**
- **Limit the front entrance to two feet above grade.** This will make infill houses more compatible with their neighbors and less imposing on their neighbors' privacy and solar access.
- **Match the front setback to adjacent houses.** Most houses in South Burlingame have front setbacks of at least 20 feet. Adjacency is easy and inexpensive to implement and will help maintain neighborhood context and streetscape.
- **Do not allow grade to be artificially raised to alter the reference point for measuring height.**

## ACCESSORY STRUCTURES

- **Allow attached garages at grade level on lots over 60 feet wide. Allow breezeway connections between houses and garages on smaller lots.**
- **Help maintain neighborhood context, Require the retention of the original primary structure, including front setback and entry façade for the addition of an ADU or internal conversion.**
- **Incorporate design standards for ADUs and other auxiliary structures to assure compatibility with the primary structure.**
- **Do not allow any bonus beyond the base density.**

## HOUSING OPPORTUNITY OVERLAY ZONE

### We request the removal of all of South Burlingame south of I-5 from the Housing Opportunity Overlay Zone:

- **The draft code proposal fails to follow City Council direction.** The draft proposal does not provide variously sized HOOZ options as directed by the City Council in December, 2016. (See attachment A.)
- **South Burlingame is more than one-quarter mile from a frequent service transit line.** Because of the I-5 barrier, there are only two access points to South Burlingame (south of I-5) from the Barbur Blvd. frequent transit service line. These are at Terwilliger and at 19th. As the pedestrian walks, each of these access points is at least one-quarter mile from any houses in the neighborhood. These distances are based on actual, on the ground measurements. (See attachment B.)
- **There is very little transit use by residents of South Burlingame.** By actual count, only five passengers disembarking from buses at Barbur and Terwilliger crossed the I-5 bridge towards the proposed South Burlingame HOOZ during a two-hour evening rush hour period. (See Attachment C.)
- **Walkability is poor. There is no sidewalk access to the commercial area.** While neighborhood residents value and patronize the businesses at the corner of Taylor's Ferry and Terwilliger, access is almost entirely by car.
- **PBOT has identified the intersection of SW Taylor's Ferry and Terwilliger as a "failed intersection," Grade "F".** It is not safe for walkers to cross either Terwilliger or Taylor's Ferry except at a signaled intersection. Taylor's Ferry and Terwilliger are primarily through streets for traffic going beyond South Burlingame.
- **Street infrastructure is inadequate.** Many South Burlingame streets do not have sidewalks. Many streets do have narrow strips of pavement and no curbs. Some streets are unimproved. This collection of streets disrupts connectivity, focuses traffic down only a few streets, and limits street parking. To include these areas in the Overlay in anticipation of their future improvement by the city is beyond wishful thinking. (See attachment D.)

## CLUSTER HOUSING

The requirements and regulations are far too general.

- Limit density and FAR to that of the base zone.
- Require orientation to the public street and other public space.
- Incorporate design standards that reflect the primary structure and the surrounding neighborhood.

Sincerely,



Robert Lennox  
President  
South Burlingame Neighborhood Association

**Attachement A.**

**HOUSING OPPORTUNITY OVERLAY ZONE DIRECTION FROM CITY COUNCIL,  
DECEMBER, 2016**

Establish a Housing Opportunity Overlay Zone in select areas.

a) Apply a housing opportunity zone within the following areas:

- ¼ mile (about five blocks) of Centers
- ¼ mile (about five blocks) of corridors with frequent bus service
- ¼ mile (about five blocks) of high capacity transit (MAX) stations
- Within the inner ring neighborhoods, and
- Medium, medium high, and high opportunity housing neighborhoods.

5<sup>th</sup> Amendment (Commissioner Fish)

a) Provide options for a housing opportunity overlay zone map.

## Attachment B.

### BARBUR AND TERWILLIGER BUS PASSENGER CENSUS

Survey date: Monday, October 23, 2017

Survey time: 4:00 – 6:00 PM

Weather: Sunny, 65 degrees.

Location: Intersection of SW Barbur Blvd and SW Terwilliger Blvd.]

A census of disembarking passengers was conducted at the Trimet stops adjacent to the intersection. Both inbound and outbound stops and disembarking passengers were counted.

Barbur Blvd is a frequent service line (#12) with a total of three inbound and five outbound lines serving the intersection. These stops serve the South Burlingame neighborhood to the south of I-5 in addition to other neighborhoods north of Barbur. The portion of South Burlingame proposed for a HOOZ is separated from Barbur Blvd by I-5. It is 1375 feet (0.26 mile) from the bus stop to the entrance to the South Burlingame neighborhood.

**A total of 5 passengers exited buses and proceeded across I-5 to the proposed South Burlingame HOOZ.**

Stops at SW 19<sup>th</sup> and Barbur also serve South Burlingame. Because these stops serve additional neighborhoods south of Barbur, they were not censused.

#### INBOUND BUSES

Did not stop	13 buses	
Stopped	7 buses	
Total	20 buses	
Disembarking passengers		3
<b>Disembarking passengers heading to S Burlingame</b>		<b>0</b>

#### OUTBOUND BUSES

Did not stop	16 buses	
Stopped	16 buses	
Total	32 buses	
Disembarking passengers		18
<b>Disembarking passengers heading to S Burlingame</b>		<b>5</b>

**Total passengers heading to South Burlingame 5**

Attachment C.

**DISTANCE FROM FREQUENT TRANSIT TO SOUTH BURLINGAME**

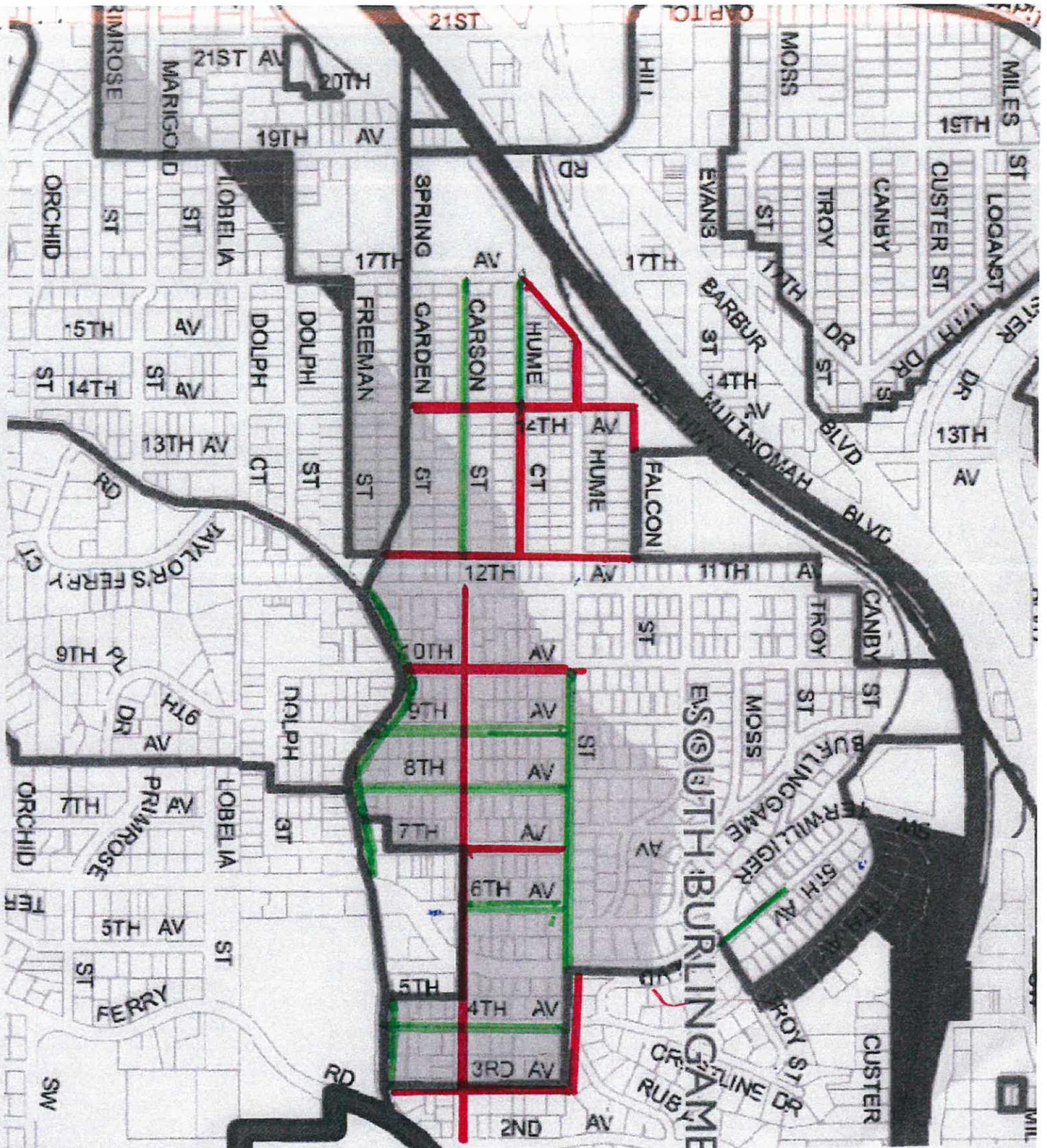
Actual distances were measured using measuring wheel.

Distances measured from bus stop on south side of Barbur to entry point to South Burlingame neighborhood and nearest houses.

Barbur/Terwilliger across Terwilliger Bridge to Troy: 1375 feet (0.26 mile). **No houses are within one-quarter mile of the nearest frequent transit stop.**

Barbur/Terwilliger across Terwilliger Bridge to steps at south end of bridge: 933 feet (0.177 mile). Accessed by a long flight of steps down to 4<sup>th</sup> Avenue, **perhaps five houses are within one-quarter mile from the nearest frequent transit stop** and are accessible by the flight of steps down to 4<sup>th</sup> Avenue.

Barbur/19<sup>th</sup> across 19<sup>th</sup> Avenue bridge past Capitol Hill School to Spring Garden Street, then left on Spring Garden to 17<sup>th</sup>: 1424 feet (0.27 mile). **No houses are within one quarter mile of the nearest frequent transit stop.**



- █ = unimproved / no curbs / no sidewalks
- █ = no sidewalks

Attachment D.

## Tracy, Morgan

---

**From:** St Johns Land Use <sjnal@gmail.com>  
**Sent:** Thursday, November 30, 2017 2:45 PM  
**To:** BPS Residential Infill  
**Subject:** Feedback from the St Johns Nbhd Land Use Chair and team

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Categories:** DD\_Comment

To Whom It May Concern,

My name is Rachel Hill, and I am the Land Use Chair for the St Johns Neighborhood Association (SJNA). I have collected comments from a series of meetings, social media conversations and discussions with community members. Generally, community members are excited to see diversity of housing types encouraged and to see “niched-in” density. St Johns has a great need for more housing, more affordable housing, and more family housing. But we are also highly concerned about displacement and affordability. This letter is a collection of the comments.

We feel strongly that over the next couple of months we would like to have more focused and contextual conversations with neighbors, and with the City about the proposal and implications, such that we can formulate a community supported viewpoint that digests and proactively suggests ideas that matter to our community and its urban fabric. I (as the Land Use Chair) was contacted by the City to discuss the Residential Infill Project (RIP), as it pertains to the St Johns Neighborhood only 2 weeks before this comment deadline. It is complex and this interaction was the first time that the City reached out specifically to the neighborhood specifically (other outreach sessions occurred at North Portland Land Use meetings but with many other land use issues on our communities’ plate, and a fully volunteer Board, focus on the RIP was not understood to be as important as we now understand it to be). We appreciate the specific connection, since we believe that the way the RIP may affect each neighborhood is unique. Although general guidelines are very important, we believe that specific tailoring to place and situation is key. We aim to be more proactive, collaborative and responsive during the next steps. We’d like to host a Planner at a General Neighborhood Meeting; and possibly a more focused discussion with a planner during a Land Use specific meeting in St. Johns.

The majority of our discussion centered around the zone that is being proposed to be subtracted from the A1 overlay. In St Johns this stretches uniformly from Smith to Columbia, flanking Fessenden.

The proposal to limit scale of houses feels like a positive aspect of the RIP.

The proposal to zone R5 to R2.5 on narrow lots is not well understood by neighbors. We believe we need to go out with a plat map to the large swath of narrow lots to specifically look at that area. The proposal could significantly increase the

number of houses in that area and although increased density is generally accepted, the sheer area that this zoning change would affect makes us reticent to fully support without more vetting. I will include general thoughts on the Historically Narrow Lot/R5 to R2.5 aspect of the RIP.

### **Our Process:**

Since we had very little time before the November 30th comment deadline, we held a neighborhood meeting on November 22nd to specifically talk through the RIP in St Johns. Without enough time to get everyone fully up to speed or to talk to the SJNA Board, this feedback is a collection of comments, concerns and ideas that came from this meeting; the collected feedback from our social media outreach; and comments collected from conversations about the RIP. We would really like to be more fully engaged in next steps as the proposal may potentially have lasting and wide spread impact on our community.

### **Discussion and Feedback:**

St Johns is a neighborhood that cares deeply about its “small town”, working class character and population. Many people agree with and are excited about development and change as it positively affects our economic future, supporting jobs and families in our community, and creating a high quality, diverse urban fabric. At the same time, the neighborhood actively supports affordable housing and anti-displacement measures and wants to support existing (and many long-standing) home owners and protect renters.

Mostly everyone at the neighborhood meeting thought that the ideas presented in the RIP have good underpinnings. The RIP is addressing aspects of community development that matter to us (increasing quantity and diversity of housing as a way to keep a diverse and affordable neighborhood).

### **A1 Zoning “Subtraction Zone”**

The planners came to us to talk through a unique aspect of the Project that would apply to St Johns (also Portsmouth, Cully and parts of east Portland). The City is proposing a zone that essentially would be subtracted from the A1 overlay in areas that are considered vulnerable to change.

The City fears that if a developer can acquire cheaper land in peripheral or lower income places (where perhaps the house is worth less than the land), they would do that because they could build a (for example) triplex and have 3 units versus an expensive single family home in inner NE that would have a smaller buyers market, and perhaps be harder to sell. That leaves areas with high rental populations and low incomes homeowners at risk for pressure. The City planners made the point that if we had put protections in place in Albina 10 years ago, we may have had a different outcome. This is a compelling analogy. However, the community is wary to support the ‘protection’ measure that would subtract areas of St Johns from the A1. They realize the intent is that it may dissuade developers from targeting lower

cost parcels and using the RIP to add infill that will likely displace residents (especially renters) and replace with units that are considerably higher than what they are replacing.

- The main concern is that the 'subtraction zone' does not offer the same opportunity to homeowners and people who are often already lower income and live in a lower income area. Instead of blanketly restricting them, we suggest figuring out a way to help them take advantage of the opportunities the City is offering the rest of the city. Do not penalize people who own in those zones - but incentivize them to participate.
- St Johns has a large Hispanic population and as exemplified in case studies from southern California, often low-income Hispanic households build ADUs as a way to add housing to their intergenerational families. This adds housing stability to a family with less monetary investment than buying multiple homes. This may be a concept to build upon in St Johns.
- The community realizes that people living in the 'subtraction zone' area may not have a lot of available money and thus this protection will not show a lot of restriction because homeowners won't be utilizing it. Developers would be the ones with the means. This keeps them from predatorily going after land, developing it and selling it at market rates. However, this assumption freezes this situation in time. It does not help lower income people actually grow their asset. Rather it restrict all growth of this nature, regardless of who benefits.
- For this reason the community understands the subtraction zone as a short term fix. Implementing it would be aimed at protecting our vulnerable residents now. Once developers acquire the land, it is harder/impossible to go back and retain those residents and low income residences. This should be a zone that "sunsets", or has a time period associated with it.

Community members are concerned, however, with allowing the subtraction zone without a clear end to its duration as they realize it is much harder to change zoning decisions AFTER the fact. The neighborhood is worried that the process to change this in the future would be laborious and take a long time. They suggest putting in time specific terms, either for restricting the A1 zoning from going into affect in those areas, or restricting how land can be bought and sold in the short term. More surgical and specific language may be cumbersome, but nuance is needed, not the broad stroke that is being proposed.

- We don't want poor quality homes, just affordable ones. Will this just keep crappy homes crappy? By restricting what can happen on parcels in this zone, this essentially keeps land/house prices down, comparatively to nearby areas that are outside of the subtraction zone. Although the lens on this is much wider than land/house real estate, it may discourage homeowners from putting money into their properties for improvements. This will especially be the case for homeowner/landlords. Rentals may remain, but they may be of poor quality or degrade.
- We want to help people improve their living situation, not lower their ability to grow their (likely) most important asset. This limits asset growth which is SO important for keeping families (inter-generationally too) out of poverty.

- We also don't want to pit homeowners against renters. We should be working towards the same goal.
- **The boundaries of the subtraction zone are terribly drawn and need more analysis. Ie, Smith would be a perfect street for something like cottage clusters. So would parts of the residential fabric off of Fessenden. The brush stroke is too broad and not contextual enough. We would like to work with the City to define this zone better.**
- We want to see data on who lives in those areas. We assume there is a high number of rentals overall. We wonder if the majority of rentals are in the apartments on Fessenden. But how rentals in the residential homes within the neighborhood? Are there more surgical ways to protect rental properties without negatively impacting homeowners?
- Units are required to be "visitable". We'd like to hear more about what that means. What is the rationale for this measure and please compare to ADA standards.

#### Historically Narrow Lot/R5 to R2.5 Zoning Change

Generally, people are in favor of increased density if done in a way that feels contextual (ie, niched into the urban fabric; with scale and visual impact that blends into its surroundings) and with affordability as core component of at least a percentage of units. The proposal to change historically narrow lots from R5 to R2.5 means that we have opportunity to add density in areas we didn't realize existed before. However, St Johns has a significantly large number of historically narrow lots and it is not fully understood how many units this may add. We would like to know more specifically about this. We also feel that those homeowners who live on parcels that will be rezoned need to be contacted specifically and their situation needs to be discussed. It is not enough to send them an official notice. The language and technicality of notices of that nature are often not understood by the layman. However, the outcome significantly impacts them (in potentially positive and negative ways).

#### Ideas and Suggestions:

- Consider a moratorium on the ability to buy and sell a property that has been developed for a certain amount of time to dissuade developers from a quick develop-and-flip scenario.
- Make the incentives for keeping units affordable even better.

- Similar to Inclusionary Zoning, require a percentage of required affordable units. Ie, this could mean a percentage of units within a cottage cluster; or 1 out 3 in a triplex. For home owner occupied units (ie, if an ADU is added), perhaps this is waived.
- Make sure there is enforcement for short term rentals.
- This all should be done with a displacement policy in place.
- Although not specifically part of the RIP as it is written now, encourage local organizations that are land rich and cash poor, and likely service local residents (churches, community organizations) to act as their own developer. Perhaps they partner with a seasoned developer to build a development that allows them to profit from their own work, maintain their own space and functions, potentially offer profit as rent assistance, or build affordable housing into their development.
- Tailor more surgical solutions to neighborhoods. Talk with neighborhoods early on about this. Although there was information available early-on, there seemed to be little early outreach to talk this through with specific neighborhoods. Neighborhoods with busy Boards, or Board members who may be less savvy to these very complex issues may not have had as much early engagement. This resulted in a feeling of urgency (and perhaps opposition, in part because neighbors wanted to understand it better before weighing in) and does not allow us to solicit input from a variety of stakeholders.
- Contact homeowners who live on parcels that will be rezoned specifically and their situation needs to be discussed. It is not enough to send them an official City notice. The language and technicality of notices of that nature are often not understood by the layman. However, the outcome significantly impacts them (in potentially positive and negative ways)

This input is a collection of feedback and suggestions from residents of St Johns. I feel it is important that the City hear our thoughts and concerns and ask that they specifically work through this with us in the near future.

Thank you for allowing us the opportunity to comment.

Kind regards,

Rachel Hill

Land Use Chair

SJNA

[sinalu@gmail.com](mailto:sinalu@gmail.com)

UNIVERSITY PARK NEIGHBORHOOD ASSOCIATION  
Comments on the Discussion Draft of the Residential Infill Project

The University Park Neighborhood Association (UPNA) Board of Directors and its Land Use and Transportation Committee requests that the Bureau of Planning and Sustainability Staff and the Planning and Sustainability Commission consider the following comments and concerns.

Overlay Zone

The UPNA is concerned that the BPS has not clearly considered seismic, geotech, and transportation and road safety in its application of the proposed overlay zone, particularly in areas that were downzoned in the new Comprehensive Plan. We request that the BPS examine these considerations in applying the overlay zone in a tailored manner that protects public safety. For instance, the Comprehensive Plan rezoned five properties south of Willamette Blvd from commercial to residential to improve pedestrian safety near a blind corner and for geotech/seismic considerations. Increasing the density to have additional housing by right on these properties may not meet the larger safety goals of the Comprehensive Plan. There are no doubt other similar situations throughout the City.

Second, there are concerns that the City's infrastructure cannot handle the increased density of the proposed overlay zone. The BPS staff should clearly document how the overlay will not overburden the City's water, sewer, road, fire safety, and private utility systems. The underlying studies were done for a much smaller overlay footprint along corridors and assumed a much lower ADU building rate than is being seen in neighborhoods. Various City Council members have expressed a 10%+ rate of properties with ADUs or over 25,000 while BPS staff used a much lower number. The ADU adoption rate will not be uniform throughout the Overlay zone, and this could create some specific infrastructure issues that might increase public investments.

Third, the Overlay Zone should eventually apply throughout the City. The BPS Staff concerns about gentrification potential and equity are valid, but the underlying data has not been provided to the public, particularly renter and owner occupied properties based on race and income. These are dynamic measures that will change each year, so a FIVE year review of any excluded areas is appropriate. Thus excluded areas, including all of East and Southeast Portland, should be eligible for the overlay eventually. Otherwise the BPS Overlay Zone will discriminate against property owners who are People of Color, Lower Income or non-English speaking because their properties will not have the value of two ADUs baked into the value of their properties.

R 2.5

The UPNA Board has received a lot of comments from owners who will have their properties rezoned under the RIP proposal. The Board feels that the BPS Staff has gone beyond the charter of the RIP in proposing this change. It also hasn't shown the public benefit of this proposal. It will lead to the reduction of historical housing and affordable housing units in the University Park neighborhood. It also reduces the opportunity for clustered cottages and other innovative housing solutions near transit. It removes the options available to current property owners for development, or the protection of entry-level housing that is currently available in the neighborhood. This proposal is the greatest rezoning in the history of the UPNA, and is being done without sufficient notice to the property owners and residents.

Thomas Karwaki  
Vice Chair of UPNA and Chair of UPNA Land Use and Transportation Committee