



August 7, 2017

City of Portland Bureau of Planning & Sustainability
Attn: Better Housing By Design Project
1900 SW 4th Ave, Suite 7100
Portland OR 97201

Re: Better Housing By Design Concept Report

To: Better Housing by Design Project Staff, and whomever else it may concern:

Thank you for the opportunity to comment on the Better Housing By Design Concept Report. We are grateful for staff's time and dedication to craft zoning regulations that will allow us to house more Portlanders more affordably.

Portland doesn't have enough housing. In particular, the city doesn't have enough housing that is affordable to lower- and middle-income Portlanders. One factor contributing to this shortage is a lack of multi-dwelling housing options across the city - both in terms of how sparsely multi-dwelling zones are mapped, and also in terms of the entitlements given by those zones.

We are excited by the direction that the Better Housing by Design code reforms are headed, especially measures meant to simplify regulations and make building housing more cost-effective. We ask staff to consider the potential impact that compounded requirements can have: For example, non-profit developers may have an even harder time delivering 3-bedroom homes when other restrictions such as stringent setbacks, site design standards, FAR limitations, and parking requirements are layered on top of each other. In effect, good projects may die by a thousand papercuts.

We also submit more specific comments for staff to consider:

Outdoor Spaces and Green Elements:

All Portlanders should have access to great parks and open spaces. We support staff's recommendations to provide flexibility for a range of outdoor space arrangements for larger sites, and to allow alternatives to conventional landscaping, such as raised courtyards and green rooftops.

We also ask staff to consider:

- Exempting small sites (7,500 sf or less) from landscaping requirements or developing less stringent standards.
- Whether Concept 4 will help achieve stated goals, or may have unintended consequences.

In addition, the City should develop a long-term strategy to site, fund, and build more public parks in East Portland, independent of zoning and building requirements.

Building Design & Scale:

We support staff's move towards a FAR-based code for multi-dwelling zones. We agree that this will allow more much-needed flexibility, open up housing choices, and re-legalize many sought-after older/existing building types that are currently outlawed. We also generally support limiting garages along street frontages, requiring building entrances to be oriented to public streets (in most cases), and simplifying side setback regulations.

However, we ask staff to consider the following:

- Increase height allowances in the R1 zone closer to 55 feet; and increase height allowances slightly in the R2 zone. Or, consider an allowed height increase on R1 sites that abut properties zoned for commercial or Mixed Use. (The gap between R1 and RH is substantial compared with most code transitions. R1 is mapped frequently alongside CM zones in higher-capacity corridors with much higher heights, where it makes sense to go a little taller and add much-needed housing.)
- Eliminate parking minimums, especially on smaller sites (under 10,000 sf).
- Remove/ reduce lot coverage requirements, especially the 60% maximum in R1.
- Rather than attempting to step down to 35' abutting single-dwelling zones on one lot, instead map small-scale multi-dwelling zones farther back into neighborhoods (or, at a minimum, up-zone adjacent lots) to yield smaller "missing middle" housing types, and provide a fuller transition into neighborhoods.
- Adjust setback standards: Reduce the 10' front setback for R1 and RH. (We support provisions that allow new building setbacks to match adjacent, existing buildings.) Standards proposed here still wouldn't re-legalize many of the best small-scale apartment buildings in Inner SE Portland, frequently with 0' setbacks.

Other ideas to explore could include:

- Create a FAR bank that allows developers to trade density, and give non-profits a preferable rate.
- Disallow detached housing in the R2, R1, and RH zones, with an exception for homes sold to income-qualified, first-time homebuyers.

Development Bonuses & Density Transfers:

We support prioritizing the affordable housing bonus, increasing the affordable housing bonus to 50%, and giving FAR bonuses for accessible and family-sized homes. We also support allowing transfer of development rights to preserve significant trees.

We ask staff to consider:

- Eliminating all other bonus items, but consider strategies to incentivize these things rather than requiring them.
- Exploring a two-tiered bonus structure for private and nonprofit developers to further incentivize more affordable and family-sized homes.

Also note where the “a” or Alternative Design Density Overlay is mapped atop R3, R2, and R1 zones, and where 33.405.050.D may therefore mean that amenity bonuses may not be utilized.

East Portland Development Standards & Street Connections:

We support staff’s direction on creating street connections in East Portland, and await code draft to assess how/if the proposal might impact development in multi-dwelling zones. However, we support staff’s recommendation to allow density to be calculated before right-of-way for a new connection is dedicated so as not to reduce housing when connections are improved, and support staff’s recommendation to allow more flexibility for small-scale ground-floor commercial uses.

As always, the members of Portland for Everyone will continue to push our local elected and City officials to make equitable and forward-thinking land use decisions that will:

- Allow plenty of affordable and diverse housing types in every Portland neighborhood
- Prioritize the housing needs of historically and currently under-served populations
- Prioritize housing for humans over housing for cars
- Allow more people to live in areas with good access to transportation, parks, and services
- Create and maintain economically diverse neighborhoods

We look forward to following the project and again thank staff for all of their hard work to create more housing and more affordable housing for all Portlanders.

Sincerely,



Madeline Kovacs
Coordinator, Portland for Everyone

1000 Friends of Oregon
133 SW 2nd Ave, Suite 201
Portland OR 97204