



September 13, 2017

Portland City Council
1221 SW 4th Ave., Room 130
Portland, OR 97205

Dear Mr. Mayor and Commissioners,

The organizations and individuals comprising Portland for Everyone are pleased to offer our support for the Central City 2035 Plan. In particular, we ask that Council adopt the height and FAR maps as recommended by the Planning & Sustainability Commission.

We are especially supportive of:

- FAR increases in locations where the City has made significant investments in transportation and other infrastructure, including the Transit Mall and Lincoln Street Station areas;
- Slight FAR increases made in the Pearl and Riverplace in order to ensure that more projects will participate in the Inclusionary Housing program;
- Changes that will simplify and increase flexibility across the Central City, and that will prioritize much-needed housing growth;
- Right-sizing FARs where appropriate;
- Increasing heights above base allowances by provision of identified public benefits, and making affordable housing the only bonus available everywhere;
- Bonuses and transfers that will preserve and upgrade historic resources without reducing housing.

We also offer some brief comments on the Plan, which will help avoid situations where, in a word, good plans may die a death by a thousand papercuts. We urge the City to:

- Ensure that development standards reflect the Central City's new designation as a Multimodal Mixed-Use Area, which removes state restrictions on density and facilitates the continued buildout of Portland's urban core while encouraging walking, bicycling, and the use of transit.
- Ensure that future design review and other land use review processes don't include reductions in entitlements given by long-range planning and zoning (and therefore reduction in the number of homes, and affordable homes, the City has planned for in well-connected areas). Certainty (in the form of land costs, financing, and lending) cannot be achieved when height and FAR can be substantially reduced on a case-by-case basis. We ask that the City ensure that the Central City plan is implemented, not undermined by a commission that is *not* responsible for considering citywide and regional goals.

- Ensure that the FAR bonus tier structure will result in more buildings with most-needed and desired public benefits, like affordable housing. We caution Council regarding the second FAR requirement that only allows projects to reach height limits through transfers: If the benchmark to reach the first FAR bonus tier is too high, and transfers are unpredictable/ otherwise unavailable, projects will only be built to the base FAR, a loss for affordable housing in areas where the Plan expressly calls for it. This is especially true in light of the balance that the Central City Plan already strikes: down-zoning in some areas, and up-zoning in others.
- Strengthen incentives that prioritize building affordable homes on-site, over pay-in-lieu.
- Maintain height and FAR allowances as is for properties with historic resources: Lowering height allowances when land values are so high will not necessarily deter demolitions and replacements, as has been argued previously. In fact, if heights remain higher, there is additional opportunity for FAR to be transferred from these historic sites onto other new construction, and avail more funds for seismic upgrades. In many cases, more FAR transfer will also increase the number of affordable homes that new sites will have to include in the City's new Inclusionary Housing program.
- We support protecting those scenic viewpoints that are most utilized by residents and visitors to Portland, and that don't require private access to enjoy. However, we also echo the Planning & Sustainability Commission's caution around protecting too many different viewpoints, some of which are much more significant and/or publicly accessible than others.
- The CC2035 plan calls for 85% non-Single Occupancy Vehicle trips in the Central City. This is a laudable goal, and we recommend as little public investment in car parking as necessary. The more public funds that can be leveraged to provide more affordable housing instead, the better.

We also encourage the City to consider that **any reductions in allowable size may also, by virtue of the recently adopted Inclusionary Housing program, also result in a loss of permanently-affordable housing in our most well-connected, amenity-rich areas.**

We encourage the City to consider this and all projects in light of its stated long-range planning goals, namely the Climate Action Plan and the Comprehensive Plan's Equity and Anti-Displacement goals.

Any policy or set of policies that reduces the total available housing capacity in the Central City will, by default, focus more development pressure in other areas of the city (and/or the region). This is a key point for those concerned with protecting Portland's most vulnerable residents from further displacement. As the Obama White House stated last year in its Housing Development Toolkit, **"When new housing development is limited region-wide, and particularly in neighborhoods with political capital to implement stricter local barriers, the new housing that does get built tends to disproportionately concentrate in low-income communities of color, causing displacement and concerns of gentrification."**¹

We need proposals that will *add* homes, and permanently-affordable homes, in high opportunity areas, not proposals that will de facto stall building in the Central City and increase displacement pressures elsewhere.

¹ https://www.whitehouse.gov/sites/whitehouse.gov/files/images/Housing_Development_Toolkit%20f.2.pdf

For these reasons and more, we strongly encourage the Portland City Council to make decisions regarding the Central City 2035 plan that will support our city's stated vision for the future. **Portland will only remain a national leader on smart growth and climate change if it expands capacity for housing in its best-connected places.**

As Sightline Institute author Dan Bertolet put it recently, “[The] benefits of compact communities... are ubiquitous in the past three decades’ research on cities. Indeed, the main lesson of that entire body of work is that compact, transit-rich, walkable, mixed-use, mixed-income cities are key ingredients to a sustainable future ... officials shouldn’t have to prove this anymore than they have to prove that hydro- and wind-powered electricity is better for the planet than the coal power that many rust belt cities rely on.”²

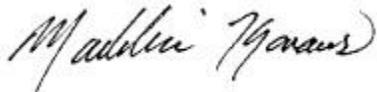
We conclude by reminding Council that Portland is in a declared housing crisis... but we did not get here overnight. Part of the solution is strengthening tenants rights, part of the solution is securing more funding for affordable housing, and part of the solution is allowing enough housing of many different kinds to be built. We must ensure that we do not continue to chronically under-build housing, and affordable housing, if we are serious about addressing this issue.

The Portland for Everyone coalition will continue to support land use policy decisions that can help:

- Provide plenty of affordable and diverse housing options in all Portland neighborhoods
- Prioritize housing for 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, and
- Create and maintain economically diverse neighborhoods.

Thank you for your time, and for your work to house all Portland residents affordably,

Madeline Kovacs



Portland for Everyone

www.portlandforeveryone.org

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

² <http://www.sightline.org/2017/04/20/not-in-your-backyard-cottages-in-law-apartments-and-the-predatory-delay-of-halas-adu-rules/>