June 12, 2018

Katherine Schultz, Chair
Portland Planning and Sustainability Commission

CC: Mayor Wheeler, City Commissioners
Susan Anderson and Bill Cunningham, Bureau of Planning and Sustainability

Re: Increase Housing Opportunities in Our Corridors - Better Housing by Design Proposed Draft

Madam Chair and Commissioners,

The Northeast Coalition of Neighborhoods appreciates the opportunity to comment on the Better Housing by Design Proposed Draft. We commend the Bureau of Planning & Sustainability on its effort to increase the amount and diversity of housing in our centers and corridors, which supports the vision of the 2035 Comprehensive Plan.

As our top housing priority is affordability, we support the proposed zoning changes to provide short and long-term affordability in our neighborhoods. We believe the form-based approach provides the simplicity and flexibility needed to increase housing opportunities, while respecting our neighborhoods’ unique charms.

With our lens of affordability, we identified the following changes essential to accommodate the growth of 100,000 households in Portland over the next 20 years:

- **Increase building coverage and FAR to match similar mixed-use zones especially on Neighborhood and Civic Corridors.**
  - Increasing coverage and FAR allows Portland to meet the Comprehensive Plan goals of increasing growth in our corridors.
  - We prioritize increasing housing on our corridors where future residents can access social services, local businesses, and active transportation connections.

Proposed changes:

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<tr>
<th></th>
<th>RM1</th>
<th>RM2</th>
<th>RM3</th>
</tr>
</thead>
<tbody>
<tr>
<td>Base FAR</td>
<td>1.5</td>
<td>2.5</td>
<td>3</td>
</tr>
<tr>
<td>Bonus FAR</td>
<td>2.5</td>
<td>4</td>
<td>5</td>
</tr>
<tr>
<td>Max Building Coverage</td>
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<tr>
<td>Base Height</td>
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<tr>
<td>Bonus Height</td>
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<td>55 feet*</td>
<td>75 feet</td>
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</tbody>
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* Only allowed in Urban Centers and Civic Corridors
• **Exempt the outdoor requirement for sites up to 15,000 square feet.**
  o Requiring outdoor space increases the cost of price of housing and can limit the number of units built on small lot sizes.
  o We prioritize the number and diversity of housing built over over outdoor amenities.

• **Remove parking minimums for all sites.**
  o Parking minimums can both increase the cost of building housing and decrease the amount of housing built.
  o Centers and corridors have been prioritized for active transportation and transit investments, which reduce residents’ dependency on driving.
  o We prioritize building more housing at lower costs to meet the housing demands of our growing region.

• **Reduce the front and street setback to zero at least in Neighborhood and Civic Corridors.**
  o Reducing setbacks provides more flexibility and is consistent with the typology of development that is being encouraged in the mixed-use zones.
  o We prioritize the increased housing and active corridors that flexible setbacks provide.

• **Reduce the side setback to zero except for abutting single-family residential zones.**
  o Reducing setbacks provides more flexibility and is consistent with the typology of development that is being encouraged in the mixed-use zones.

• **Allow the deeper housing affordability bonus inside of conservation and historic districts.**
  o These districts make up a significant part of our neighborhoods where affordable housing remains a significant need.
  o We prioritize increasing affordable housing across all of our neighborhoods, including conversation and historic districts.

We believe incorporating these changes will allow Better Housing by Design to fully meet its important goals to accommodate housing growth, provide a diversity of housing types, and prioritize affordable housing.

Regards,

Paul Van Orden, Chair
Northeast Coalition of Neighborhoods