



Bureau of Planning and Sustainability
Innovation. Collaboration. Practical Solutions.

February 25, 2019

Chair Shemia Fagan
Senate Committee on Housing
900 Court Street NE, HR B
Salem, OR 97301

RE: SB 10

Dear Chair Fagan and Members of the Committee:

Thank you for the opportunity to comment on SB 10. The City of Portland supports the principle of encouraging more density near transit. This approach is key to addressing the City’s goals to provide a wide range of housing opportunities, encourage active transportation and reduce our carbon emissions. However, SB 10 raises serious concerns for the City. The bill mandates dramatic density requirements and does not reflect the complexities of redeveloping a built-out city like Portland. The legislation also fails to address how to balance these density mandates with the other statewide planning goals that require cities to provide a transportation system and other infrastructure needed to support the density, as well as impacts to natural resources.

Portland recently completed an eight-year process, with extensive public engagement, to update our comprehensive plan. Through that process, the City re-committed to a strategy that focuses our growth in our transit-oriented mixed-use centers and corridors (see map). In addition to the comprehensive plan update, the City also updated the Central City plan, which included increases in building heights, density and affordable housing bonuses.

Our zoning map provides twice as much capacity as forecasted growth and we continue to increase density with ongoing updates to our single-family and multi-family zones. We continue to look at ways to increase density within the context of our built environment. The Bureau of Planning and Sustainability is currently working on zoning code changes to allow triplexes and four-plexes in 95 percent of Portland’s single-family neighborhoods. We also are updating our multi-family zones to allow for a broader range of housing types and densities. These projects will further increase Portland’s development capacity, especially in proximity to transit service. Both projects also reflect extensive work with local stakeholders and community members.

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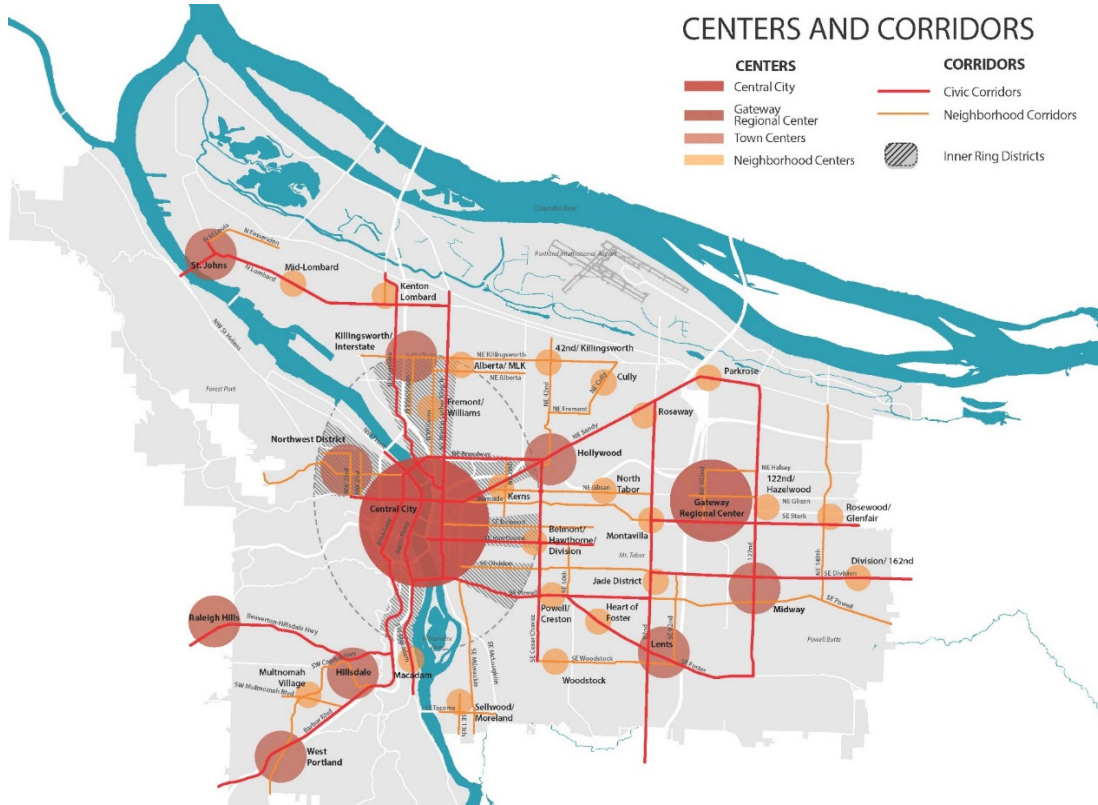
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The City's mixed-use zoning and higher density multi-family zones that allow for more than 75 units per acre are focused in these centers and corridors, especially near light rail transit stations along Interstate Avenue, the Hollywood District, and the Gateway District. This growth pattern is working – 89 percent of the housing units permitted in 2018 were in these higher density centers and corridors.



The one-quarter mile and one-half mile buffers in the proposed legislation would be disruptive to Portland's neighborhoods. As shown on the attached map, 63 percent of Portland would be covered in one of these buffers, most of which is within the one-quarter mile higher density buffer. Nearly all of Inner Portland is within one-half mile of a frequent bus line. For reference, the distance between SE Belmont Street and SE Hawthorne Boulevard is 0.30 miles, so that area would be rezoned to 75+ units per acre under this legislation. In most of East Portland, the distance between SE Division Street and SE Powell Boulevard is 0.50 miles, so that area would be rezoned to 75+ units per acre under this legislation.

Our experience with increasing density has revealed significant challenges in dealing with impacts to the transportation system, especially on State facilities. There also are challenges with providing other needed infrastructure, adequate park facilities and avoiding or mitigating impacts to natural resources. It will be complicated and expensive to upgrade the transportation system to serve the SB 10 zoning pattern and meet the congestion performance standards in the Transportation Planning Rule and the Oregon Highway Plan. The zoning pattern mandated in SB10 amplifies these challenges and will be difficult to address under Oregon's Statewide Planning Goals, which will leave these changes open to



legal challenges. It is difficult to see how the State, Metro, and the City of Portland could create and fund a transportation system that would support the density pattern mandated in SB 10.

Finally, one of the emerging issues in Portland when we look at increasing density is displacement of lower-income households as a result of redevelopment. SB 10 does not provide local jurisdictions the opportunity to make adjustments where increased development creates a real risk of increased displacement. Local jurisdictions need the ability to be able to factor in the risk of gentrification when making zoning changes.

While the underlying intent of SB 10 to increase density in proximity to transit service is consistent with the overall vision in Portland's 2035 Comprehensive Plan, the proposed bill would upend the City's work and fails to acknowledge and address the other impacts of growth that Oregon's statewide planning system requires the City to consider and respond to as part of its planning and rezoning process. The City of Portland appreciates the opportunity to comment and is willing and able to work with the committee and stakeholders on ways to encourage more development that is supportive of our transit investments.

Sincerely,



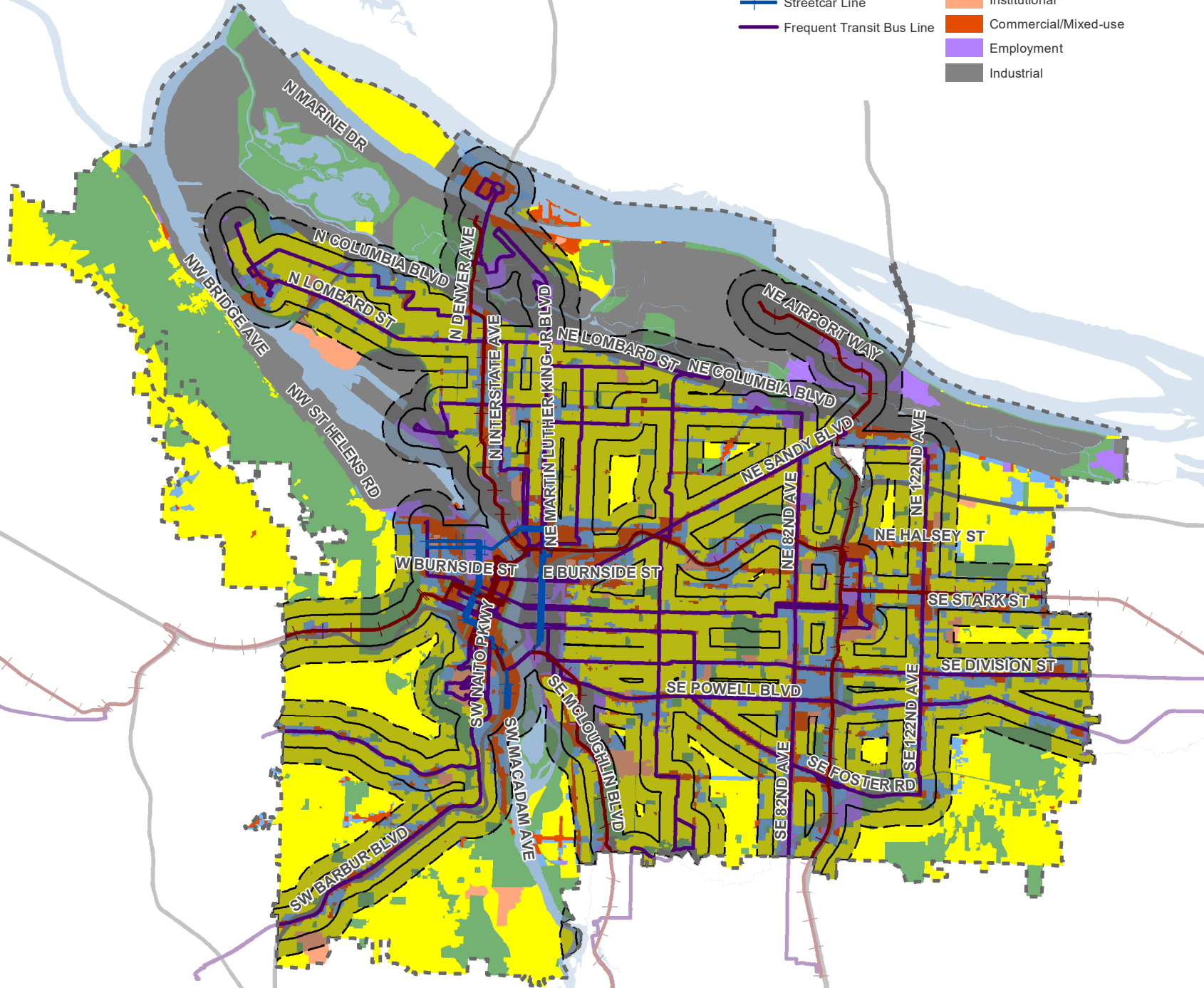
Joe Zehnder
Interim Director



SB10 - Transit Oriented Development

Legend

- - - Urban Service Boundary
 - Quarter-mile Transit Buffer
 - Half-mile Transit Buffer
 - MAX Line
 - Streetcar Line
 - Frequent Transit Bus Line
- Comprehensive Plan Designations**
- Open Space
 - Single Dwelling Residential
 - Multi-Dwelling Residential
 - Institutional
 - Commercial/Mixed-use
 - Employment
 - Industrial



The information on this map was derived from City of Portland GIS databases. Care was taken in the creation of this map but it is provided "as is". The City of Portland cannot accept any responsibility for error, omissions or positional accuracy.

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