To Chair Fagan, Vice-Chair Heard, and the Members of the Senate Committee on Housing

I oppose Senate Bill 10.

Here's why.

SB10 will **rezone the great majority of Portland's residential neighborhoods to 45 to 75 units per acre.** You can see this from the Trimet map below which shows <u>almost</u> the whole city is within 1/2 mile and 1/4 mile of frequent service transit routes.



45 to 75 units/acre is 104 to 172 persons/acre, at the typical Portland household size of 2.3 persons/household. That **translates to 24 to 40 persons/10,000 sq ft.**

That **population density is equivalent to Portland's most dense, most urban, highrise areas** such as downtown, the Pearl, Goose Hollow, etc. The map below shows Portland's population density, measured as persons/10,000 sq ft. <u>Only the dark red</u> <u>blocks have the level of density that SB10 will mandate for the whole city.</u> <u>https://</u> projects.oregonlive.com/maps/density/



To put this in broader context, SB10 would rezone almost every neighborhood of Portland to **densities 2X to 4X the density of Manhattan** (10 persons/10,000 sq ft).

(SB10 would also rezone areas around light rail stations to 140 units/acre, which is 322 persons/acre and 74 persons/10,000 sq ft. That density is "off the charts" for Portland.)

The above is true for other cities and towns in Oregon that have frequent transit routes. SB10 will have **statewide effect.**

The problems with such a rezoning are:

1. **SB10 will overwhelm infrastructure in residential neighborhoods.** This includes utilities (water, sewer, etc), amenities (parks, services), road capacity, and transit (today's "frequent transit service" is not adequate to support SB 10 density levels).

2. **SB10 will throw local comprehensive planning out the window.** For example, see the map of Portland's Comprehensive Plan, below. The plan concentrates highest density in three urban centers (downtown, Lloyd Center, Gateway) with high density directly on specific transit corridors and moderate density close to those areas. On the map, "dark red" representing higher and highest density. SB10 is equivalent to coloring almost all of the city "dark red". Oregon cities and counties should do their own local planning. The state should set and enforce targets (such as affordable housing) but legislators in Salem should not make local zoning decisions.



3. **SB10 will result in widespread displacement.** Urban redevelopment has a sad history in Portland. In the last few decades, infill redevelopment in North and inner NE Portland displaced many lower-income households, renters, and communities of color. Redevelopment is now displacing those communities from other "close-in" neighborhoods. Market-driven redevelopment replaces existing older, lower-priced housing with new, higher-priced housing and raises rents and prices in the remaining existing housing. 14,000 lower-income Portland households live in lower-priced rental houses. When neighborhoods are redeveloped with new market-rate apartments that drive up neighborhood rents, those families are forced out. For more, please see the February 12, 2019 statement of Commissioner Andre Baugh, during the Portland Planning and Sustainability Commission's hearing on a local upzoning proposal ("the Residential Infill Project"): video at https://youtu.be/sFwSk6wQFoU

4. **SB10 will result in widespread demolition and environmental waste.** Each older Portland house demolished represents embodied energy wasted, and our urban forest loses the property's trees. Even if the new construction is energy efficient, <u>it takes 50</u> <u>years to recover the climate change damage.</u> Much new residential cosntruction is not designed to last much over 50 years. See this study, which was partly performed in Oregon: <u>The Greenest Building</u>.

5. **SB10 will destroy neighborhood character and livabiity.** Portland is a city of neighborhoods. We have a variety of residential environments, from urban high-rise areas (Pearl, downtown) to quiet tree-lined streets of close-spaced older houses, from lively mid-rise corridors (SE Division, N Williams, inner E Burnside/NE Sandy) to

suburban neighborhoods. <u>Applying a one-size-fits-all rezoning to the whole city will</u> <u>unnecessarily destroy Portland's character.</u>

6. **SB10 is not needed.** Portland's <u>Buildable Land Inventory</u> showed that the city has sufficient land that was appropriately zoned to grow the number of housing units by 85% (room for 213,700 new units in addition to the approximately 250,000 existing units). Portland has capacity to nearly double in population without rezoning. Since that report, zoned density has been increased in Portland, and <u>the 2016 "Map Two, Inventory of Sufficient Buildable Residential Land"</u> (copy below) shows that Portland has sufficient zoned land for needed housing and growth. There is not a shortage of developable land here. Construction is at record levels, and as the map shows, our major centers and corridors are lined with parking lots and under-used properties that are available for replacement with housing. Portland has appropriately zoned for growth and does not need the buildozer rezoning of SB10.



Submitted by:

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