

Northeast Coalition of Neighborhoods

Portland, Oregon

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October 15, 2019

Mayor Wheeler, Commissioners
City Council

CC: Andrea Durbin and Bill Cunningham, Bureau of Planning and Sustainability

RE: Expand Affordable Housing Options - Better Housing by Design Recommended Draft

Mayor and Commissioners,

Thank you for the opportunity to comment on the Better Housing by Design Recommended Draft. We appreciate the efforts by the Bureau of Planning & Sustainability (BPS) to *increase housing options in our centers and corridors* in support of the 2035 Comprehensive Plan.

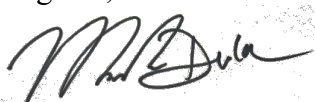
We continue to support the form-based approach to provide the flexibility needed to increase housing, while respecting our neighborhoods' unique charms. We commend BPS's responsiveness to our comments on the proposed draft in June 2018, enclosed. Specifically, we believe changes to increase the building coverage in RM1-4 and allow affordability bonus and floor area ratio (FAR) transfers in historic and conservation districts will provide needed housing opportunities.

NECN is concerned that parking requirements will prevent the recommended draft from providing housing needed to accommodate the growth of 100,000 households in Portland over the next 20 years.

Analysis provided by BPS projects parking requirements leading to the creation of luxury townhomes instead of mixed-income developments with affordable housing. For example, parking requirements would incentivize construction of 10 townhomes selling at \$700,000 on a 100'x100' lot. However, without parking requirements and with the affordable housing bonus developers would be incentivized to build 28 units selling at \$300,000 plus 4 affordable units.

As affordability is our top land use priority, we repeat our request to **remove parking minimums for all sites**. We believe this change is essential to provide short and long-term affordability in our neighborhoods.

Regards,



Mariah Dula, Chair

Northeast Coalition of Neighborhoods

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