



Sullivan's Gulch Neighborhood Association, c/o Holladay Park Plaza, 1300 NE 16th Ave., Portland, Oregon 97232
<http://www.sullivansgulch.org>

DATE: July 10, 2017
TO: SGNA Board
FROM: SG-LUTC
SUBJECT: Better Housing by Design – Concept Report

At our LUTC meeting on June 22 we discussed the subject report. Comments on the report are due to the City by July 27 so there is not time for the LUTC and Board to review the report in more detail before then. This memo outlines the thoughts and concerns raised by LUTC members. As LUTC Chair, I will help draft a response to the Concept Report for the Board. We need input from you to do that.

Background

[Better Housing by Design](#) is an effort by the City to modify zoning regulations that apply to medium to higher density multi-family housing zones, which include R-3, R-2, R-1, and R-H zones. The number label in these zones equates to a density standard. The R-3 zone currently allows one dwelling for every 3000 sq. ft. of lot area while the R-1 zone allows one dwelling for each 1000 sq. ft. of lot area. The RH zone regulates density using design standards that limit building height and that cap the habitable floor area ratio (FAR) that can be inside a building. FAR is calculated as the ratio of floor space that can be constructed relative to lot size. An FAR limit of 1.5 means that on a 2000 sq. ft. lot the building could not have more than 3000 sq. ft. of floor area. The current regulations for these zones may be viewed [here](#).

Portland is reviewing these regulations to help it meet its housing goals in the 2035 Portland Plan. It also wants to streamline development review and reduce design/development costs. Concerns have been raised that the existing code does not require enough open space in higher density projects and allows development that is out of character and form with surrounding uses. Here is a link to a [summary of the issues](#) the project seeks to address based on an early round table discussion with developers.

The process is entering a critical juncture where the City is going to begin drafting code language in line with the findings/feedback they have gotten during the preliminary fact gathering stages. They have produced a [Concept Report](#) with new approaches that would modify the zoning code. Draft code will be written this summer after they get feedback on



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the Concept Report. Information meetings on draft code and adoption hearings will take place this fall.

What is relevant to SGNA?

There is a lot in this project that does not apply to us, such as the street connectivity requirements that focus on East Portland. There are other things that likely will affect development in SG but what is proposed is either really technical (e.g. accessibility/access standards on first floor units per ADA requirements) or does good things, like requiring RH projects to include open space, allowing green roofs over parking garages to meet landscape/OS requirements, and setting up bonus programs and TDRs for historic buildings and tree preservation. Things that are more relevant include:

- Changing rules for R-1 and R-2 zones – these zones are common in SG. The R-2 zone applies to most of the neighborhood west of 21st Avenue. There is a ½ block deep strip of land that is planned for R-1 zoning on the north side of Weidler between NE 16th and NE 21st. There is a ½ block deep strip of land that is planned for R-2 zoning on the north side of Weidler between NE 21st and NE 24th Avenue. Most of these properties are already developed but redevelopment to higher density is possible on all properties zoned R1 and R2 that now are in SF use. The [Concept Report](#) (see pages 14 – 15) proposes a form-based approach to regulating density, which would eliminate density caps and instead regulate density based on height and FAR limits.
- Building setbacks and height transitions - A criticism of the current code is that it does not provide sufficient landscape and open space. When redevelopment occurs in existing neighborhoods the design often is in conflict with existing setbacks and building heights. A series of amendments are proposed related to front set backs, height step backs, and side/rear set backs to allow efficient use of available land but not conflict with adjacent development. See the [Concept Report](#), pages 16 – 18.
- Driveways/Garages – the City initially took a strong stance against front curb cuts for driveways to single car garages in the R-2 and R-3 zones. This issue was contentious. They are proposing to limit the amount of a building frontage that garage openings can take up hoping this design requirement result in fewer row house/ townhouse developments with driveways and garages.
- Affordable Housing bonus – rules would grant waivers from site development regulation for projects that include affordable units. This is significant because many of the properties zoned R-1, 2, and 3 are small lots that likely preclude buildings big enough to trigger inclusionary zoning requirements (i.e. the site is not big enough to include > 20 units), which may make these properties attractive for speculators looking for redevelopment opportunities not encumbered by inclusionary zoning



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rules. The City is trying to incentivize inclusion of affordable units in these smaller projects as a matter of policy. It is not clear if these incentives will be effective. See the [Concept Report](#), page 19.

Questions.

The LUTC viewed the above issues as the most relevant to SG but did not take a stance on any of them. Here are some questions to prompt discussion.

Should we support Form-based Code approach for R-2 zone? On the positive side it would allow for more design flexibility for redevelopment projects. It likely would increase density. On the down side there would be no design review for these projects. Should Sullivan's Gulch work on design guidelines that, hopefully, will lead developers to build better projects?

Should we support the proposed changes to development standards for R-1 and RH zones? I am not sure if design review is avoided/triggered by 'large' scale projects. I will have an answer by the 18th. If not, do we want to recommend design review for projects above some threshold? What other concerns do Board members have for RH/R1 regulations?

Do we want to weigh in on the front curb-cut/driveway/garage argument?

Do we want to comment on the affordable housing incentives and tree bonuses?