

January 16, 2020

Mayor Ted Wheeler and Commissioners Eudaly, Fritz, and Hardesty
1221 SW Fourth Avenue
Portland, OR 97204

RE: Residential Infill Project

Dear Mayor and Commissioners:

Thank you for the opportunity to comment on the proposed Residential Infill Project (RIP) reforms. The Urban Greenspaces Institute works across the Portland-Vancouver metropolitan region to integrate greenspaces with the built environment. We engage with agencies, nonprofits, and the public on collaborative conservation initiatives and how to best leverage our limited public resources to achieve wildlife habitat connectivity, clean water, and public access to nature.

The Urban Greenspaces Institute is part of the Portland For Everyone and Portland Neighbors Welcome coalitions. We urge you to move ahead with the proposed RIP reforms and the set of amendements suggested by Portland Neighbors Welcome and Portland for Everyone. We recommend that you: legalize fourplexes by right, adopt deeper affordability measures, and embrace the proposed Anti-Displacement PDX renter protections.

In my comments, I want to talk about trees. A common sentiment heard around town these days is that developers are felling Portland's big old trees and knocking down older, affordable houses to make way for high-priced homes. I do not dispute that the City's tree code is an imperfect tool that warrants strengthening. But the proposed residential infill rules are *not* a threat to trees: because the proposed reforms eliminate on-site parking minimums, reduces the size of homes, and does not expand building footprints. Also, the RIP reforms gives more flexibility adaptation of the existing residential building stock, incentivising reuse over total redevelopment. As a result all of these factors, the RIP reforms may actually retain and create *more* space for trees as compared to the status quo.

Tree advocates should appreciate that the reforms remove all off-street parking requirements in particular: this single change makes more space for trees and allows more Portlanders to live in areas with good transit and economic opportunity. Space for parking occupies large areas of our cities. A recent study, 'Quantified Parking,' calculated that there are 5.2 parking spaces per household in Seattle, with a population density that is less than half that of its parking density (13 people versus 29 parking stalls per acre).

On-site parking competes for space with trees and housing, and adds to housing costs. On-site parking limits where trees may be preserved and planted - both in yards and in street right-of-ways. Curb cuts for off-street parking eliminate planting spaces for street

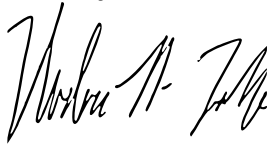
trees. Impervious areas for parking contribute to the urban heat island and stormwater runoff, whereas trees mitigate for such impacts.

Areas reserved for cars can and should be repurposed for more important needs like affordable housing and climate change mitigation. Home builders who choose to include parking should be required to plant extra trees and pay into affordable housing funds, since their product exacerbates our problems. The latter approach is not part of the proposed residential infill reforms but it would strengthen it.

Another benefit of RIP is that it would create more access to well-treed neighborhoods for lower-income tenants and homeowners. Portland's single-detached residential zones have more trees, as compared to commercial corridors and multi-family zones. Renters, people-of-color and lower income Portlanders currently concentrate in under-treed districts, making access to urban tree cover an environmental justice challenge. By creating more affordable units into Portland's single-family residential zones, the residential infill reforms will create more access to trees and their plethora of environmental and social benefits.

As we adapt to climate change and respond to the affordable housing crisis, we need walkable, transit-accessible, affordable and well-treed neighborhoods. Let's move ahead with the residential infill reforms - for housing justice and climate justice.

Sincerely,

A handwritten signature in black ink, appearing to read "Ted Labbe". The signature is fluid and cursive, with the first name "Ted" being the most prominent.

Ted Labbe, Executive Director
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