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February 1, 2022

City of Beaverton Planning Commission and  
Planning Department staff  
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### **RE: Proposed Beaverton middle housing reforms**

Beaverton Planning Commissioners and staff:

Thank you for the opportunity to provide comments on the City's proposed middle housing reforms to comply with Oregon HB 2001. There is much to like about the City's proposed code reforms, which will promote greater housing choices and more climate-friendly policies around tree conservation and reduced parking requirements.

The Urban Greenspaces Institute (UGI) advocates for and leads collaborative urban greenspaces conservation across the Portland metropolitan region. We work to safeguard and reclaim greenspaces as places for people and wild nature, and to address the climate crisis. In all our work we seek to redress social and environmental injustice, to create healthy, connected and resilient communities.

We previously provided general comments during fall 2021 on the three broad alternatives developed by your staff. At this time we offer general comments on the proposed reforms and may follow up with more specific comments later in the year.

In general, we offer our strong support for the package of middle housing reform developed by your staff. We like the smaller minimum lot sizes, smaller setbacks, building size flexibility, reduced parking minimums, new on-site open space requirements, and especially the new tree preservation incentive and planting requirements.

In our review of the proposed code adjustments, we find that the staff proposed reforms are well-thought through and integrate well. They consider the City's needs to advance in other arenas like climate change mitigation and adaptation. For example, the new open space requirements and setback requirements on individual sites will create space to plant new required trees, to grow the City's urban forest canopy over time. Similarly, relaxed parking minimums will create greater design flexibility and space for both housing and green spaces in residential zones.

We are particularly fond of the City's proposed incentive to provide additional building square footage for every tree greater than 10 inches in diameter preserved on a site. To our knowledge, this is a novel approach in the Portland metropolitan region and worthy of replication in neighboring cities. We like this approach because it links opportunities for enhanced housing capacity with tree preservation. Trees create important visual and auditory buffers for development, so it makes sense to link these two aspects of the reform package.

*In Livable Cities is Preservation of the Wild*

In a few aspects of the proposed code reform, we think the City can go farther. We appreciate and support sentiments expressed by Planning Commissioner Teater at the January 19, 2022 Planning Commission meeting: please consider ways to ease the procedural burden for residents to comply with the new residential design review requirements. We agree that most new developments should be reviewed by staff, not the Planning Commission.

We also think that the City's on-site parking minimums could be further eased or eliminated entirely for triplexes and quadplexes. Is there any place in Beaverton where parking supply is limited? Other cities in the region like Portland and Milwaukie have either removed all on-site parking requirements or are considering greatly scaling them back in all/most residential settings. Parking minimums raise the cost of housing and limit other desirable on-site amenities (like trees and greenspaces).

Alongside these middle housing reforms we would encourage the City to consider improvements to its tree code, similar to what the City of Milwaukie is undertaking at present. In particular, the City of Beaverton's wholesale exemption on tree removal for developed residential lots of one-half acre or less is an enormous barrier towards tree conservation in Beaverton. On lots of one-half acre or more, up to four trees 10 inches diameter or more may be removed per year. Finally, the City's use of a regulated tree size threshold of 10 inches likely leads to the unnecessary loss of smaller trees, that may eventually contribute towards significant tree canopy. Many cities in the region are now moving towards a regulated tree size threshold of six inches in diameter. These are just a few of the deficiencies that we have identified in the City of Beaverton's tree code that warrant fixes.

We look forward to supporting the City's middle housing reform package as it moves forward. These middle housing reforms represent an important part of the City's efforts to increase access to affordable and climate-ready housing. Thank you again to the excellent work done by your staff, and for the opportunity to provide comments and input.

Sincerely,

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

Ted Labbe, Executive Director  
Urban Greenspaces Institute

CC: Rob Zoeller, Theresa Huang, Derron Coles, Janelle St Pierre, Lori Hennings, Tim O'Brian, Ashley Short, Micah Meskel, Fran Warren