



Home Builders Association
of Metropolitan Portland

November 5, 2020

Eli Spevak, Chair
Planning and Sustainability Commission
1900 SW 4th Ave.
Portland, OR 97201

Re: Historic Resources Code Project Proposed Draft

Dear Chair Spevak,

The Home Builders Association of Metropolitan Portland represents over 800 businesses and thousands of women and men who work in the residential building and remodeling industries throughout the greater Portland area. We are dedicated to maximizing housing choice for all who reside in the region while promoting housing access and availability for everyone.

The COVID-19 pandemic is causing severe economic disruption throughout the broader metropolitan region and the state. Home building, like many industries, is facing an uncertain future. New housing starts are down across the metropolitan region. This is attributable to increased material costs and reductions in available capital to finance new projects coupled with an uncertain economic outlook. This lack of new construction means that Portlanders will have even fewer housing options to choose from in the coming years.

Oregon is grappling with a serious decline in new home construction starts at a time when we remain gripped in a severe housing crisis. Indeed, despite the economic downturn, Oregonians continue to desperately need new housing. The Portland Business Alliance 2020 Housing Affordability report found that the Portland region built 23,000 fewer units of housing than needed in the past decade. The report further shows that this critical lack of housing units is the root cause of both the homelessness crises and Portland's rapidly rising cost of living.

Given the trying combination of the current economic outlook and the pressing need for new housing to meet Portlanders' needs, the City should take targeted steps to support new housing construction in tandem with advancing other critical priorities such as energy efficiency and climate change mitigation. With this in mind, we recommend the following targeted changes to the Historic Resources Code Project Proposed Draft (the "Proposed Draft").

Remove All Preservation Requirements for Detached Garages. Portland is taking bold steps to promote transit use and deemphasize car storage as a critical part of new housing. The Residential Infill Project strongly discouraged garages in most developments and even prohibited them for some new homes. With this, the City provided clear evidence of its support for housing without garages. Surprisingly, the Proposed Draft takes the exact opposite approach. It requires demolition review for all detached garages *unless* a new garage is built in its place. Oddly enough, Portland is proposing to force homeowners to go through demolition review if they are removing a garage to

build a mere vegetable garden but not if they are building another garage. This proposal stands in stark contrast to the ideals contained in the Residential Infill Project and, as such, the removal of detached structures that are not independently historically significant should not trigger demolition review.

Exempt Solar Installation and Window Replacement from Historic Review. The City of Portland has time and time again reaffirmed its commitment to energy efficiency. Most recently, Portlanders overwhelmingly approved the formation of Portland Clean Energy Community Benefits Fund and the City Council unanimously passed a Climate Emergency Declaration. Unfortunately, the Proposed Draft appears to ignore these, and instead continues to require costly historic resources review when homeowners want to increase their energy efficiency with new windows and decrease their carbon footprint with solar panels. Importantly, new windows are one of the most important home energy efficiency upgrades. Portland should continue to recognize the importance of energy efficiency and solar power and take affirmative steps to make these more attainable for all residents. Failing to do so will inhibit the City’s ability to achieve its established climate goals.

Encourage the Creation of Accessory Dwelling Units. As discussed above, Portland remains in a housing crisis. The overall lack of housing supply is driving up rental and home prices. The recent downturn in construction will only enhance this crisis. However, the Residential Infill Project will start to move the needle in the right direction, and support the creation of much needed new housing. The Proposed Draft takes steps in the right direction and allows for the creation of 400 square foot accessory dwelling units (ADUs) without historic resource review. Unfortunately, the 400 square foot cap does not align with either industry standards or other City regulations, that both envision ADUs up to 800 square feet. Portland should take this opportunity to fully embrace ADUs and support their creation in historically designated areas and provide exemptions from historic resource review for ADUs up to 800 square feet in size.

The Historic Code Resources Project Proposed Draft lacks alignment with key City goals and priorities around garages, energy efficiency, green energy, and housing. We encourage you to take this opportunity to address the above issues and ensure that the Proposed Draft compliments, rather than conflicts with, these properties.

Best,

Ezra Hammer
VP, Policy and Government Affairs

Cc: Jeff Bachrach, Commissioner
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