Dean P. Gisvold

From:

Steven Cole <stevencole86@gmail.com>

Sent:

Saturday, May 20, 2017 10:27 AM

To:

Rep. Alissa Keny Guyer @oregonlegislature.gov

Cc:

board@irvingtonpdx.com; jsheuer@easystreet.net

Subject:

lrvington opposition to HB 2007

Attachments:

HB 2007 opposition letter.docx

May 20, 2017

Re: HB 2007

Dear Representative Keny Guyer,

I am president of the Irvington Community Association (ICA) and I am writing on behalf of the board which unanimously determined that it cannot support HB 2007 based on the information we have regarding the latest amendments and the potential impact that they will have on housing in Portland. The ICA urges a "no" vote on this bill based on both the content, which will not increase affordable housing, and the process, which improperly takes power from the local government, and is possibly in violation of Oregon law.

The consensus of the board is that the proposed bill does not appear to be an affordable housing bill, rather it appears to be a developer-enrichment bill. In addition, we believe this is an unacceptable usurping of Portland's ability to ensure that compatible buildings are approved by the city as well as the usurping of the collaboration between the city and Portland residents to come up with a workable plan. Overriding the valuable work that the Portland citizens and city agencies have done is disrespectful to the countless hours spent on this local issue.

The ICA is supportive of attempts to increase real affordable housing in Portland. In particular, we would like to see an increase in affordable family housing; housing with multiple bedrooms. Part of what makes Portland's neighborhoods great is that they allow for a diverse collection of people and include the presence of families with children. Given the deluge of studio and 1 bedroom apartments, which currently seems to be the overwhelming choice of developers, it appears that it is more lucrative for developers to build for people who live as a childless couple or singles. The ICA is concerned that removing oversight of developers and then incentivizing the demolition of more affordable family housing in the established neighborhoods will result in a loss of more affordable family housing to be replaced with more profitable housing; either a McMansion or housing with units which are not suitable for families.

For five years, local builders have constructed a significant amount of new housing, dramatically increasing the supply, but the rents and prices have continued to rise at record rates. This legislation will continue that trend, but at the expense of old established neighborhoods, and National Historic Districts.

The ICA also opposes any attempt to enact legislation which would hinder the effectiveness of a National Historic District. It is clear from some of the discussion surrounding this bill that National Historic Districts are being portrayed as impediments to affordable housing. In actuality, the opposite is true. Irvington is an economically diverse neighborhood with many different housing options. We have single family homes, condominiums, apartments, ADUs, and housing for elderly people. While National Historic Districts are not perfect solutions, they do encourage retention of the more-affordable family housing, which is the first type of housing to be demolished by developers. One need only look at the neighborhoods abutting Irvington to see what developers would do if given unfettered access to an historic district. Comparatively modest family homes are being demolished and replaced with much larger homes which sell for two to



three times the cost of the demolished home. In some cases, the demolished home is replaced by two homes which each sell for twice the price of the original home. Thus, while density is increased, albeit minimally, affordability is certainly not.

Hence, contrary to some of the arguments, we believe that a National Historic District is an important tool to retain diverse neighborhoods in Portland. If you truly want to ensure that a bill is not simply a gift to developers, allowing them to build in more established, inner-ring neighborhoods, where they will build very expensive housing, you will enact a plan which encourages building in neighborhoods where there is more capacity for infill with greater incentives to build affordable housing, rather than McMansions or high-end townhomes. The current bill will not achieve that goal.

It should also be noted that the Land Conservation and Development Commission recently approved changes to the State's Goal 5 rules for protecting historic resources after 6 months of work with inputs from around the state. These new rules require jurisdictions to consider availability of affordable housing and other factors in their Comprehensive Plans in regulating historic resources. This allows communities to find their own solutions recognizing that affordability and preservation of existing housing stock are not conflicting goals. This bill would overturn the Goal 5 rules before they have even had a chance to be implemented. That is simply poor policy.

In summary, any bill that comes from the state should not override, but should be consistent with plans worked out by the city of Portland along with its local stakeholders; it should not ignore the need for middle-class family housing; it should discourage the tear-down of smaller, less-expensive single family homes; among other potential tools, it should look at options such as taxation of surface parking lots to encourage better and higher use of under-utilized property; it should look at why certain areas of the city, such as Gateway and the Lloyd District, remain under-developed.

Affordability of housing is an issue in Portland, just as it is in every other west coast city. It would be potentially disastrous to rush through a bill which will actually have the opposite effect of what is intended. The local government is in a far better position to understand the local nuances and address this issue, at least as far as zoning, design review, and historic districts.

The ICA opposes HB 2007 as amended. Thank you for your consideration of our points.

Regards,

Steven Cole

President,

Irvington Community Association

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