## Comprehensive Plan Testimony

Please stop allowing non-conforming development in R-5 zones city wide. 25X100 lots are non-conforming to the R-5 base zone and should not be granted building permits. Our density goals are already being met without this type of development and this type of development is extremely destructive. Currently 17,000 homes sit on lots that could be developed on, encouraging demolitions of homes and trees. Also, when scrutinizing the code, it doesn't really seem legal to grant building rights on these lots.

There was never a skinny home built in Concordia before 2001. They are not "grandfathered rights" as the code says because they were never allowed in the first place. BDS gave that right in early 2000.

This type of development encourages destruction of old growth trees and is in direct opposition to the goals in the comp plan for protecting urban tree canopy, reducing heat islands and protecting watersheds. Also, skinny lot construction is exempt from the new tree code so they are guaranteed to be destroyed.

"Objective D: Increase tree canopy

Currently, tree canopy covers about 26% of the city. Many tree deficient areas are also lower-income neighborhoods, some with air quality problems.

By 2035, Portlanders have planted more than 250,000 trees. Large canopy trees are protected, and tree canopy covers at least 1/3 of the city."

This year alone, we have seen 15 old growths of Concordia's 96 old growths go down to build on skinny lots. That is not what the cities goals are in this comp plan and if the practice of granting building rights to non-conforming lots of record are stopped, the city will reach its goals on protecting large tree canopy in this comp plan.

Also, please stop the needless destruction of our older homes for suburban style infill. There needs to be minimum setbacks that conform to the neighborhood and help protect trees. There absolutely is a demolition epidemic happening and the city needs to encourage restoration not demolition by implementing significant landfill taxes.

"Direction 3: Adapt and mitigate for a changing climate

Objective A: Reduce home energy use

Over the past 20 years, household energy use has increased by 19%. Buildings account for more than 40% of carbon emissions in Multnomah County.

By 2035, household energy use is 20% lower than current levels."

What we are seeing with the uptick in demolitions is in direct opposition of these goals. The new homes being built are twice the size of the current homes, increasing energy costs, wiping out all old-growth trees, creating larger heat islands and creating millions of tons of waste annually. 36 million tons of waste was generated from demolitions alone last year and 38% of it ended up in the landfill. This is a tremendous waste and is not sustainable.

These are typically 1 for 1 replacements and do nothing for our density goals.

We need to create smart laws that enforce these goals. Currently, the city caters to developers who are not at all in-line with the cities goals or its residents and are rapidly destroying urban canopy are creating millions of tons of waste of embodied energy.

Thanks,

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