



Home Builders Association
of Metropolitan Portland

July 26, 2016

Katherine Schultz, Chair
Portland Planning & Sustainability Commission
1900 SW Fourth Avenue
Portland, OR 97204

Re: Central City Plan – Low-Carbon Buildings/Standards

Chair Schultz and Commissioners:

The HBA of Metro Portland appreciates the opportunity to comment on the Central City Plan, in particular those items that address low-carbon buildings and standards. We recognize the importance of taking appropriate measures to lessen our carbon footprint, at the same time furthering policies that promote affordability for current and future residents of Portland.

The HBA actively encourages initiatives and building practices that promote sustainability and a healthy environment. The association works closely with Energy Trust of Oregon to promote better building practices in the city, to include energy efficient, high performance homes and buildings designed and constructed to contribute to the long-term viability of our community.

The items outlined are a commendable step toward improving energy efficiency and promoting a healthier environment for our residents. However, there are items that stand out as problematic from a policy perspective and toward achieving the shared goal of housing affordability for Portland.

Specifically, the policy proposal outlined before the Commission (35.510.244, et seq.) selects one green building certification system over other, federally-recognized systems. At a time when the city is in the midst of an affordability crisis, now is not the time to adopt a policy that picks winners/losers and drives up the cost of development, unintentionally impacting housing affordability.

Rather than outlining such a narrow policy for low-carbon buildings and standards, the Commission should look to the U.S. General Services Administration (GSA) for guidance on the matter. If the City wishes to adopt green building standards as part of its Central City Plan, it should acknowledge those firms that are recognized by the GSA in its review of green building certification systems.

By using an acknowledged, Federal standard, the City can ensure a greater degree of certainty in the process and provide the development community with comprehensive, environmentally sound, and potentially lower-cost options that can better achieve these shared environmental and affordability goals for our residents.

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The HBA values our relationship with the City and looks forward to working together on these important issues for Portland. Thank you for your consideration of the proposed items.

Respectfully,

A handwritten signature in black ink, appearing to read 'P. Grove', with a long horizontal flourish extending to the right.

Paul Grove
Associate Director of Gov't Affairs
Home Builders Association of Metro Portland