



Home Builders Association
of Metropolitan Portland

September 23, 2019

Lake Oswego Planning Commission
380 A Ave
Lake Oswego, OR 97034

Subject: Community Development Code Annual 2019 Amendments, Interior Side Yard Setback Plane and Steeply Down-Sloped Lots (Item 7.1)

Dear Commissioners,

The Home Builders Association of Metropolitan Portland (HBA) represents over 1,400 companies and tens of thousands of women and men who work in the residential building and remodeling industries throughout the greater Portland area. We work to promote housing affordability and are dedicated to maximizing housing choice for all who reside in the region.

HBA supports Policy Code Amendment Item #19: Interior Side Yard Setback Plane and Steeply Down-Sloped Lots (Policy 19). If adopted, it would treat all steeply sloped lots equally by exempting them from the side yard setback plane requirements established in the City's Infill Design Standards. These required side yard setback planes are currently required for all lots except steeply up-sloped lots. Policy 19 would simplify the design, plan review, and construction processes by applying the same criteria to both types of steeply sloped lots. Through its adoption, the City would save homeowners thousands of dollars as well as time spent on permit review and variance requests.

As is the case with steeply up-sloped lots, Policy 19 would allow for more efficient and functional use of space on the upper floors in many down-sloped homes. Under the existing rules, it is extremely challenging to fit truly functional living space inside the pitched side yard setback plane. Multiple levels of small building plane step-ins overcomplicate the placement of support systems such as mechanical and HVAC chasing and venting, which compete for peripheral conditioned space in order to provide the most amount of living area. Likewise, with each additional step-in comes the expensive and time-consuming requirement for additional water barrier, flashing, and sealing to prevent water permeation and energy transfer. Importantly, the change would not permit increased building height and would merely allow for more flexibility to design sustainable homes.

Policy 19 would simplify the design process, leading to less staff review time and likely saving homeowners thousands of dollars in permit fees and carrying costs due to faster permit issuances. Additionally, more functional plans will lead to reductions in construction and inspection timelines. Overall, exempting the both steeply up- and down-sloped lots will save time and money leading to a reduction in the cost of building new homes. For these reasons the HBA enthusiastically supports Policy 19 and recommends that the Planning Commission adopt the proposal.

Sincerely,

Roseann Johnson
Assistant Director of Government Affairs