

November 17, 2015

Portland City Council
1221 SW 4th Avenue
Portland, OR 97204

Re: Accessory Structures Project – Proposed amendment

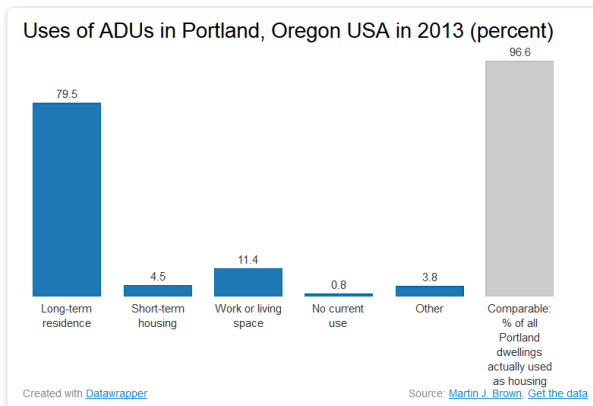
Mayor Hales and Members of Portland’s City Council,

I strongly encourage City Council to pass the accessory structure code update package as recommended unanimously by the Planning Sustainability Commission – *without* an amendment that singles out ADUs as ineligible uses of small, 1-story detached structures in setbacks.

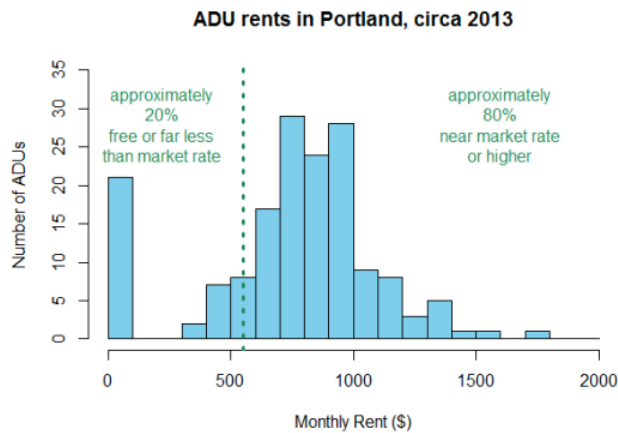
Portland is experiencing a housing emergency for people, not for cars. For decades, detached accessory structures meeting height and size limits have been allowed to abut property lines if they meet the definition of ‘garage’. This proposed code update would, among other things, allow that same structure type to be used as a small, discreet, home. That’s exactly what we should be doing to create affordable, in-fill housing opportunities for smaller households. Yet an 11th hour amendment – following months of public process – would block this chance to create exactly the type of ADUs current regulations have thus far stifled: small, 1-story homes tucked into sides and corners of lots where otherwise a garage might have been.

Based on comments from the first city council meeting on this topic, a couple findings from a 2013 DEQ survey of 290 Portland ADUs might be helpful in grounding discussions of how ADUs actually get used:

(1) Just because Portland has simultaneously seen growth in ADU development and growth in short term rentals *does not mean* that ADUs are used primarily as short term rentals. That’s a fallacy unsupported by data. The only statistically significant local data that exists comes from DEQ’s survey, which found that nearly 80% of ADUs were used as long-term residences and 4.5% were used as short-term rentals. Although it would be reasonable to infer from recent trends that these percentages may have changed somewhat, it would be extreme conjecture to suddenly assume that a high percentage of ADUs are used as short term rentals.



(2) ADUs play an important role in providing market-based affordable housing within existing neighborhoods. Nearly 20% of ADUs are rented out for free or far below market rates – without any ongoing public subsidy. These ADUs are providing extremely affordable housing for people who would, almost certainly, be paying rent if they lived anywhere else. And even ADUs rented at full market rates of around \$1,000/month are relatively affordable compared with (larger) single family homes in the same neighborhood.



Locating ADUs where garages could otherwise go is a perfect way to discreetly slip them in, providing much-needed affordable homes within Portland’s single dwelling zones. Please support the *original* accessory structure code update proposal.

Sincerely,

Eli Spevak
Orange Splot LLC