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Testimony to **Portland City Council** on the **Shelter to Housing Continuum Project, Recommended Draft**

I urge the Council, as it debates amendment 3.1, to maintain the requirement for sewer and water hookups for RVs and THOWs—or identify equally effective ways to ensure environmental standards are maintained. Lowering standards, especially through a permanent code change, is not a step that should be taken lightly, in my view. That is especially true for standards that touch on Portland’s core values, such as being good custodians of the environment. Such standards arguably should only be eased briefly in the face of catastrophic natural disaster. The push to eliminate the sewer hook-up requirements for RVs and THOWs does not meet that high bar. The June 2019 “Addendum to Gap Analysis” memo by Johnson Economics even casts doubt, in my view, on whether tiny homes—at least when clustered together in a village— merit any special treatment. That memo estimates rents in TH villages, even in parts of the city where land is relatively inexpensive, will be well above what households with incomes under 30 percent of MFI will be able to afford. I believe any available incentives should go to the options most likely to yield housing units that those extremely low-income individuals—including chronically homeless individuals receiving SSI benefits—can afford. The Johnson memo says that “only the Modern SRO and Efficiency Studio prototypes are priced at a level that can meet” the 30 percent threshold. I happily defer to BES experts on which, if any, S2HC utility hook-up proposals can be tweaked to accommodate the requests of PDX Shelter Forum and PNW without compromising environmental standards. The BES ideas on possible financial assistance for RV/THOWs owners certainly struck me as a reasonable way to do so.

Testimony is presented without formatting.