



May 28, 2024

Portland Planning Commission
1810 SW 5th Avenue, Suite 710
Portland, Oregon 97201

Re: 2024 Housing Production Strategy Discussion Draft

Dear members of the Portland Planning Commission,

Oregon Smart Growth (OSG) is a coalition of developers, investors and allied professionals committed to the feasible development of walkable, livable communities that are environmentally, socially, and economically sustainable.

OSG appreciates the City of Portland's current focus on increasing housing production, as a critical strategy to address our housing affordability crisis, reduce homelessness, and enhance our city and region's economic prosperity. In Portland alone, the City estimates we need over 20,000 more regulated affordable housing units over the next decade and a similar number of new moderate income and market rate homes. And production is trending in the wrong direction.

We strongly support the Discussion Draft of the *2024 Housing Production Strategy*, and urge the Planning Commission to advance it to the City Council.

We would also encourage the Planning Commission to strengthen the strategy by committing to launching a project—not just “explore,” as called for in the Discussion Draft's “Access to Opportunity” section—to consider allowing more multifamily zoning in high-opportunity neighborhoods.

We would also encourage the City to take even bolder action to advance housing production. Whether in the *2024 Housing Production Strategy* or through separate actions, OSG has proposed several additional pro-housing policy change ideas to the City alongside coalition partners, including:

- Allow projects in the Central City to request height variances if the modification would increase the amount of housing provided on site, meet shadow study requirements, and not exceed the heights of any relevant Scenic Resources Maps.
- Increase FAR — and consider tying FAR and the potential height of a building to a U.S. building code building type — to help developers maximize density and residential units.
- Clarify that Historic Resource Review cannot have the effect of reducing allowable unit count or dimensions below those set by the site's zoning — just as the Design Commission isn't allowed to deny a building based on height, density, or FAR.
- Adjust thresholds and qualifications for SDC waivers and tax incentives, to help more projects secure necessary financing, particularly those that are affordable for households up to 80-120% of AMI.

Thank you for the opportunity to comment on the Discussion Draft. We look forward to continued partnership with the City toward advancing housing production in Portland.

Sincerely,

Tom Rinehart
Executive Director

707 SW WASHINGTON ST., SUITE 927 | PORTLAND, OREGON 97205

President
Sarah Zahn
Urban Development Partners

Vice President
Cassidy Bolger
Killian Pacific

Secretary/Treasurer
Doug Burges
Greystar

Board Members

Gary Reddick
OTAK

Christe White
Radler White Parks & Alexander LLP

Bryce Payne
Banner Bank

Allison Reynolds
Steel Rives

Sam Rodriguez
Mill Creek Development

Jordan Lamson
Oregon Law Group

Stephen Goodman
Downtown Development Group

Michael Nagy
Wood Partners

Ben Bortolazzo
Guardian

Anselm Fusco
Holland Partner Group

Jake Sly
R & H Construction

Will Short
ScanlanKemperBard Companies, LLC

Executive Director
Tom Rinehart
tom@oregonsmartgrowth.org