



September 13, 2016

Katherine Schultz, Chair  
Planning and Sustainability Commission  
1900 SW Fourth Avenue, Suite 7100  
Portland, Oregon 97201

Dear Chair Schultz and Commission Members:

The Portland Business Alliance (“Alliance”) represents more than 1,850 member companies including small, medium and large employers in the Portland-metro region. The Alliance has a long history of supporting social services and efforts to address homelessness. As you know, we are engaged with the Home for Everyone Initiative and over the last year we have partnered with the city and county to identify publicly owned and privately owned buildings that may be used for temporary shelter.

We know that we have a shortage of emergency shelter beds and affordable housing units and that there are more people living on the streets than we have capacity for as a community. Many private citizens, social service agencies, religious and other institutions have attempted to fill service-level gaps in trying to provide temporary shelter and affordable housing but the cost associated with conditional uses reviews, traffic studies and occupancy permits have discouraged several from moving forward with plans. We are, therefore, pleased that the proposed *Mass Shelters and Housing Zoning Code Update* seeks to remove barriers to citing affordable housing projects, mass shelters and short-term housing.

We understand that a number of the amendments provide additional opportunities for short-term housing and mass shelters to locate by right, especially in commercial and employment zones. The amendments also make it easier to use existing buildings by reducing the level of conditional use review from a Type III to a Type II process. This helps to reduce cost and shorten processing timelines while ensuring that staff still evaluate projects that are subject to conditional use review and that neighbors are informed about any new proposals for shelters.

We are pleased that no amendments are proposed that would allow the siting of mass shelters or short-term housing on industrial zones. As we learned through the city of Portland’s recent comprehensive plan update, the city has a finite amount of industrial land, land that is needed not only to contribute to needed job growth and the economy, but also for the city to meet state and Metro land use goals. As past Value of Jobs reports have shown, these lands provide opportunities for quality middle-income jobs, especially for those with less than a four-year college degree, and are needed to help address our city’s housing affordability challenges.

Additionally, we strongly support the amendment for city-subsidized affordable housing projects to undergo a Type Ix land use review as opposed to the Type III review which requires a public hearing and pre-application conference. That said, we urge that language constituting what is classified to be affordable housing be modified to mirror that of the inclusionary zoning legislation that is being developed by the city. For example, the proposed amendment states that “at least 20 percent of the total number of dwelling units must be affordable to those households earning no more than 60 percent of the area median family income (MFI).” To ensure consistency, the threshold for the percentage of units required to be affordable and the designated MFI-level should match what is required under the new IZ regulation once it is adopted.

Thank you for your consideration of these comments. We look forward to continuing to work together to identify both short-term and long-term solutions to our city’s homelessness and housing crisis.

Sincerely,

A handwritten signature in black ink, reading "Sandra McDonough". The signature is fluid and cursive, with the first name "Sandra" and last name "McDonough" clearly legible.

Sandra McDonough  
President & CEO

cc: Portland City Council  
Susan Anderson, Bureau of Planning and Sustainability