



October 5, 2021

Chair Smith
Clackamas County Planning Commission
2051 Kaen Rd.
Oregon City, OR 97045

Subject: ZDO-277 Phase I Land Use Housing Strategies – October 6th Public Hearing

Dear Chair Smith and Commissioners:

The Home Builders Association of Metropolitan Portland (“HBA”) represents over 850 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.

Portland Metropolitan Association of Realtors® (“PMAR”) has more than 8,800 members who are committed to protecting and promoting equitable homeownership, establishing and maintaining high professional standards of practice and creating unity in the real estate profession.

Together, our associations are inextricably linked in property acquisition, financing and construction of housing – including multi-dwelling and mixed-use development – contributing to a healthy supply of both rental and homeownership opportunities.

In June, our associations strongly supported the Board of Commissioners continuing its technical work on the Clackamas County (“the County”) Phase I Land Use Housing Strategies Project (“Project”), rooted in the County’s 2019 Regional Housing Needs Analysis (“HNA”) and HBA-supported 2018-2019 Housing Affordability and Homelessness Task Force policy recommendations. During the August Planning Commission (PC) hearing, we provided public comment on the Project proposal (“Proposal”).

We thank the PC for unanimously supporting our request for a mixed use flexible siting amendment, which would allow the proposed 20% housing bonus to apply to any site developed with a mix of uses. The amendment specifically allows non-residential uses on a mixed-use site to be located in a separate structure from residential, and/or on any floor of a mixed-use building. We urge the Board to approve the Proposal’s siting flexibility amendment, which allows properties – particularly those with unique shapes, topography, or surrounding views-- to be developed to their best use.

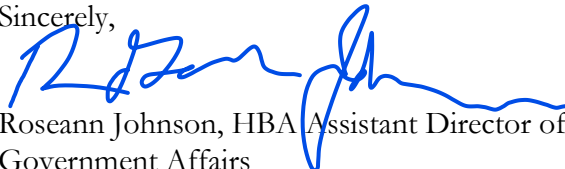
In order to meet the mixed-use intent, we also support staff’s most recent proposed amendment to ZDO Section 1012, which establishes a baseline non-residential mixed-use requirement. This amendment would require at least 20% of a site’s building area to be developed with a commercial, retail, or other publicly-facing use, in order for a project to qualify for the 20% housing density bonus for mixed-use development.

The combination of mixed-use siting flexibility, mixed-use and affordable housing density bonuses, and reductions to required parking, allows the County to incentivize mixed-income development. The current Proposal contains a 50% density bonus for both for-sale and rental units held affordable to households at or below 80% Median Family Income (MFI), for at least 30 years. Additionally, the proposal's mixed-use siting flexibility allows private investment to locate throughout a site, offering public-facing amenities in more strategic locations than simply the bottom floor of a multi-family building. By designing intentional spaces of interaction throughout the development, opportunities for cross-household social ties and capital increases.

According to its HNA, the County faces a nearly 5,000 housing unit deficit in its urban unincorporated areas. Of the 8,175 dwelling units projected over the next two decades, the County expects 40% will need to multifamily, including mixed use residential units. However, because most high density multifamily land is built out with only about 9 remaining unconstrained commercial / mixed use vacant acres, the County lacks the appropriately zoned land with which to meet its expected multifamily housing need.

To help address the housing deficit in these areas, our associations continue to wholeheartedly support the Proposal to increase allowed density to 60 dwelling units / acre in the four applicable commercial zoning districts, provide the 20% density bonus for flexibly-sited mixed use developments, and reduce parking requirements by .25 spaces per bedroom unit category. By encouraging more combined urban housing and commercial activity in the C-3, RT, OC and CC commercial zones – where mixed use is already allowed – the County can help close the gap on its high density residential needs while maintaining a thriving commercial and retail sector.

Sincerely,


Roseann Johnson, HBA Assistant Director of
Government Affairs


Michele Gila, PMAR® Director of Realtor®
Advocacy

Cc: Sonya Fischer, Commissioner
Paul Savas, Commissioner
Martha Schrader, Commissioner
Mark Shull, Commissioner