



Home Builders Association
of Metropolitan Portland

January 19, 2021

Chair Frost
Hood River Planning Commission
211 2nd Street
Hood River, OR 97031

Subject: Public Hearing File No. 2020-37 - Middle Housing code update

Dear Chair Frost and Planning Commissioners:

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.

The City of Hood River (“City”) has conducted a 2015 and 2019 Housing Needs Analyses along with a 2105 Housing Strategy. All three documents highlight the need to use existing land for housing in a more efficient manner than is currently allowed by code.

In the fall 2020, approved changes to the Columbia River Gorge Management Plan limited the Hood River Urban Area to a cumulative lesser of 50 acres or 2% boundary revision moving forward. This change further restricts land available for needed housing in Hood River and as such, makes efficient land use all the more important for providing housing at a variety of income levels. Therefore, the City should adopt a flexible Middle Housing code that is able to respond to the market and produce as much housing as possible.

I would like to offer some observations and recommendations regarding the proposed Middle Housing code as presented in the public documents for this evening’s public hearing:

- The draft Model Housing code appears lacking some of the development standard tables to which it and the memo both refer, such as for lot coverage, driveways and parking standards. While the draft code itself appears to have driveway and parking standards, lot coverage standards appear left out. The City should include all relevant development tables so that the public may review before moving forward to adopt the proposed code.
- The MH code should address four-unit configurations, a.k.a. quad-plexes, and allow each unit to be greater than 900 square feet. The proposed code addresses multiple two and three-unit arrangements with units over 900 square feet, and acknowledges they could have a land division applied, but seems to leave out four-unit arrangements on a site. It is important to address four-unit arrangements so they do not inadvertently fall under the cottage cluster code, which as defined would limit each unit to 900 square feet. If the lot is large enough, it is reasonable to expect that four units

over 900 square feet can and would be built to increase household livability. In fact, there are many examples in the Portland area of new four-unit arrangements that include units over 900 square feet. The City should allow four-plexes in a separate code section, or remove the 900 square foot limitation in the cottage cluster definition.

- The MH code defines two-dwelling units and three-dwelling units (a.k.a. Middle Housing Duplex and Middle Housing Triplex) as attached *or* detached. This is very positive and is a huge win for home ownership opportunities given the demand for detached living structures and the opportunity to apply a condominium map or land division to the site.
- Proposed code Section H.a. Open space requirement is currently at 30%. In the spirit of creating more housing, it would be better to reduce this to 20% or 25% for more habitable living space. This is the opportunity to incentivize Middle Housing and should be distinguishable from other code requirements such as planned unit developments.
- Proposed code Section H.c. currently disallows wetlands and steep slopes from counting toward open space. Again, in the spirit of creating more housing, the city should consider allowing one or both of those categories to meet the requirement.
- Overall, the City should allow the market to determine placement of garages and allow for partial encroachments of garages and front porches into side yard setbacks.
- The Model Code should allow ADUs on duplex, triplex and quadplex sites and amend any other applicable development codes to allow them as well. This allows the City to incentivize the market to be creative in site design.
- Proposed parking requirements are currently 1 space per unit, and discussions related to the tradeoffs between parking and housing are ongoing with some recommending less than 1 space per unit. In 2020 the City drastically amended its parking calculation for multifamily to incentivize the creation of higher density housing in its multifamily zones. In the same spirit, the City should consider allowing .5-.75 parking spaces per unit, especially near transit.

Thank you for the opportunity to provide comment on the important topic of Middle Housing in Hood River.

Sincerely,


Roseann Johnson

Cc: Sue Powers, Planning Commission Vice-Chair
Bill Irving, Commissioner
Tina Lassen, Commissioner
Amy Schlappi, Commissioner
Megan Ramey, Commissioner
Erika Price, Commissioner