



May 8, 2023

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*Rita Grady – Polk CDC*

*Maria Elena Guerra - Farmworker Housing Development Corp*

*Nkenge Harmon Johnson – Urban League of Portland*

*Brad Ketch – Rockwood CDC & Community Dev. Corp. of Oregon*

*Erica Mills – NeighborWorks Umpqua*

*Shannon Vilhauer – Habitat for Humanity Oregon*

**Representative Julie Fahey  
Chair, House Committee on Rules  
900 Court St NE  
Salem, OR 97301**

**Re: Support for House Bill 3414**

**Chair Fahey, Co-Vice Chairs Breese-Iverson and Kropf, and Members of the Committee:**

Housing Oregon calls on you to support the passage of HB 3414 to establish the Housing Accountability and Production Office. The proposal provides a balanced approach to supporting the Governor's goal of increasing housing production with technical assistance and resources to support local control.

Housing Oregon is a membership-based statewide association of over 80 affordable housing community development corporations and ally organizations committed to serving and supporting low-income Oregonians across the housing needs spectrum.

There are numerous examples of affordable housing developers submitting variance, modification or adjustment requests of local land use and building codes that do not substantially impact the overall goals of what the code is trying to achieve but help to facilitate lower development costs, faster development timelines, or the production of more units.

Examples include pursuing variances addressing unclear and non-objective standards regarding construction materials, set back requirements, parking requirements, design and historic review. Often times our members are unable to get the variance approved, or, through the process of seeking approval of a variance, the project gets more complicated, increases the timeline and cost, and/or stops the project from moving forward.

Our members have raised a few issues and concerns that, if not addressed in amendments, might be taken into consideration through program implementation.

Rural member organizations have pointed out the unique challenges smaller cities face with limited staffing capacity and concerns the office may be seen as providing an oversight role utilizing a hammer approach. We believe it's important to emphasize the bill's intent to provide technical assistance, best practices advice, and utilization of voluntary compliance agreements between the State and local jurisdictions before enforcement action is taken.

Similar to the practice with the City of Portland's Bureau of Development Services, we recommend priority be given to affordable housing projects in the queue for staff technical assistance, investigation and response to complaints and violations of housing law in order to minimize time delays and cost.

One resource for the office to consider providing is best practices for addressing diversity, equity and inclusion for local jurisdictions when engaging with culturally specific affordable housing developers. Member organizations led by People of Color have reported experiences with local jurisdiction officials, including elected officials, who have appeared to have biases when working with and/or approving projects led by culturally specific developers.

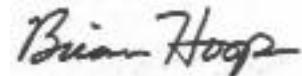
We also encourage the office to contract with established non-partisan intermediaries such as the League of Oregon Cities and/or Association of Oregon Counties to provide peer matching with local government elected and appointed officials in furtherance of their responsibilities to comply with housing laws and to reduce permitting and land use barriers to housing production.

In SECTION 5, we recommend a new subsection (2) to evaluate the effects and consequences of short-term rental accommodations (permitted or not) on the supply and availability of affordable rental housing in localities within Oregon. Much of Oregon's affordable housing stock is being used for short term rental purposes, especially in tourist-dependent mountain and beach communities. If this stock were made available for year-round rental accommodations, then the acute shortage of affordable housing could be alleviated without adding new supply.

In SECTION 3, subsection 2, we recommend the provision of local jurisdictional incentives (additional height; FAR or waivers to setbacks and/or parking requirements) to religious organizations who agree to provide land (by lease or fee title) to sponsors for the provision of affordable housing, provided the housing is income qualified and subject to long term use restrictions (covenants or deed restrictions) for a term of not less than thirty years. This is similar to measures taken in Washington State.

We urge a YES vote for HB 3414. Thank you very much for your consideration of our comments. You can reach me at 503-475-6056 or [brian@housingoregon.org](mailto:brian@housingoregon.org).

Sincerely,



Brian Hoop  
Executive Director  
Housing Oregon