

March 4, 2025

VIA EMAIL ONLY

Senator Khanh Pham  
State of Oregon  
900 Court St. NE, S-407  
Salem, Oregon 97301  
[Sen.KhanhPham@oregonlegislature.gov](mailto:Sen.KhanhPham@oregonlegislature.gov)

Re: Minimum Housing Density Standards

Dear Senator Pham:

The Senate Committee on Housing and Development is considering the idea of minimum density as a tool to spur additional housing production. As a land use attorney whose clients build housing throughout Oregon and Southwest Washington, and as someone who has spent over a decade in the residential development industry, I strongly discourage the Committee from advancing the idea of minimum density. Despite the allure that it provides—after all more housing is better than less—minimum density requirements actually impede the development of housing.

For example, a residential developer client recently inquired about the development of townhouses on a vacant parcel in Portland. The land has a CX zoning designation, one of the city's most permissive, that allows for a wide array of residential development. Despite this zoning, and fantastic access to transit and amenities, the land has remained underutilized for many years. Due to the myriad challenges of building apartments in Portland, my client is only able to obtain financing for townhouses, a popular type of urban housing. However, because the land is located within the Central City Community Plan area, there is a minimum density requirement that serves to effectively prohibit townhome developments. As such, the minimum density requirement means the land will most likely remain vacant, providing no benefit to anyone.

While certainly well-intentioned, as a practical matter minimum density requirements actually prohibit, rather than promote housing, in many urban areas where there is not sufficient market interest in high density housing.

Very truly yours,

JORDAN RAMIS PC

Ezra L Hammer  
Admitted in Oregon, Washington and California

cc: Members, Senate Committee on Housing and Development

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