

From: Rod Merrick
To: [JWMNR Exhibits](#)
Subject: "HB 2007 Testimony" Damaaging and Very Expensive Response to the Housing Affordability Crisis
Date: Tuesday, June 20, 2017 10:56:49 PM

Dear Senator Richard Devlin and Representative Nancy Nathanson and members of Ways and Means,

Sausage making has transformed an innocently named bill originally intended to increase the availability of "affordable" into an expensive and confusing if not cynical response to everyone's concern about the housing shortage/affordability crisis. The legislation now under consideration in Ways and Means *lacks even rudimentary analysis* of the costs, benefits, legality, or possible impacts. If enacted as law, the fundamentals of our state land use laws, comprehensive plans, local decision making are undermined.

But for the moment please consider the **potential fiscal impacts:**

Outlaws single family zoning throughout Oregon

Zoning laws and Comprehensive plans in every city larger than 2500 population in the state will have to be rewritten including public comment review cycles. This requires extensive staff time, extensive public comment and additional burden on DLCDC. Consider also that legal challenges to bypassing public comment cycles are likely to cost hundreds of thousands. Real dollars, real unbudgeted costs with no cost benefit analysis.

Arbitrarily short-circuits the land use and plan review process for "needed housing"

There are in place statutory regulations establishing timelines for review and permitting. The bill appears to shave about 20 days from the process for something called "needed housing" (originally "affordable housing). The bill fails to consider the scope of the project (backyard ADU, SOR tower, or single family house) or to respect other priorities. Shortening the cycle could also increase carelessness by harried reviewers or the issuing of arbitrary comments to force an extension. When there is a sudden change in the permit workload, additional staff must be hired and trained (or laid off) and this measure will only exacerbate these costly cycles for local governments. Real dollars, real unbudgeted costs with no cost benefit analysis.

Eviscerates protections for residential historic districts throughout Oregon.

DLCDC just completed a multi-month review of Goal 5 protections for historic districts. Tens if not hundreds of thousands of dollars and hundreds of staff and volunteer hours spent on this will be wasted. As HB 2007 is amended once again, cities around the state must spend staff hours attempting to address the most impactful and destructive elements. And if passed the Goal 5 process will have to be redone. Real dollars, real unbudgeted costs with no cost benefit analysis.

Eviscerates discretionary design review everywhere except in 2 locations in Portland. This requires cities with discretionary design review to either end discretionary design review (as the advocates of the legislation would like to see) or engage in an

expensive process to upgrade or rewrite all of their design review guidelines and standards into non-discretionary standards. Hundreds of thousands of dollars, extensive staff time, extensive public comment and additional burden on DLCD. Real dollars, real unbudgeted costs with no cost benefit analysis.

Deregulates constraints on potentially inappropriate housing on land owned by “places of worship”, and on land near airport runways.

The bill is now a grab bag of expensive measures to benefit the primary sponsors. The home builders association gains the ability to tear down and redevelop viable housing and neighborhoods into more expensive product with fewer constraints- this does and will drive up housing costs. One Thousand Friends gets to satisfy their crusade to eliminate single family zoning and future historic districts (that they irresponsibly label NIMBY, racist, and exclusionary) without regard to local land use and transportation planning or the loss of the kind of housing most Oregonians prefer.

This legislative approach to land use planning is highly divisive and environmentally unsound. TO THE PURPOSE OF HB 2007- it does nothing measurable for affordability. The time has come to set this bill aside for public hearings and a full economic analysis.

Thanks for your consideration.

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