



March 5th, 2024

Senate Committee on Housing and Development
900 Court Street NE
Salem, Oregon 97301

Dear Senator Pham, Senator Anderson, Senator Broadman, Senator Nash, and Senator Patterson:

Community Partners for Affordable Housing (CPAH) is a non-profit Community Housing Development Organization operating in Washington and Multnomah Counties. We develop and operate affordable housing, support our residents with services, and provide homeless services for Washington County.

It is no secret that Oregon has been in a deep housing crisis for some time, and this crisis is even greater for low-income families. The issue of housing and housing affordability has been a dominant issue in the legislature for most sessions over the last ten years, but as Oregon continues to fall short of our state's housing production targets, more work must still be done.

As developers of affordable housing, we are no stranger to the regulatory barriers that hinder housing production. That is why CPAH is pleased to see that SB 49 brings forward several bold ideas to help remove more barriers to greater housing production.

CPAH is supportive of efforts to streamline upzones, ensuring that jurisdictions have land that can realistically accommodate larger multifamily developments, and having individuals with expertise in the development of multifamily housing sitting at the table to help craft our state's building codes.

The issue of ensuring that jurisdictions have enough land to realistically accommodate larger multifamily developments is critical to support the development of affordable housing. The largest source of funding for affordable housing is the Low-Income Housing Tax Credit (LIHTC) program. To reach the necessary economy of scale for a LIHTC development to pencil, approximately a minimum of 40 units per site is needed. If jurisdictions do not have land and zoning that can accommodate this level of density, the ability to leverage the LIHTC program becomes more challenging and thus prevents the ability to develop affordable housing.

One item in the bill that could use further refinement is the minimum density proposal. The current proposal speaks to a challenge that CPAH recently faced with one of our new developments.

While working through the predevelopment process of a new community, the property was unexpectedly upzoned by the local jurisdiction. While CPAH is excited to provide additional

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housing for more households, meeting the new zoning requirements more studio and one-bedroom units had to be added. This resulted in the percentage of family-sized units in this development dropping below 50% as originally proposed and causing a gap in the development budget.

If CPAH had instead been allowed an option for greater flexibility as an affordable housing development to instead meet a minimum bedroom density as opposed to a minimum unit density, we could have met the zoning codes desired density goal with a fewer number of units as required by code through the development's inclusion of many two-, three-, and four-bedroom apartments. Currently, minimum density requirements in the zoning code view a development solely comprised of studios equivalent to one that is all family-sized units.

At a time when Oregon is in desperate need of more affordable, family-sized homes, CPAH calls for greater flexibility be offered to affordable housing developments which already have strict occupancy standards to ensure these communities are not under-housing the potential number of residents.

In the end, CPAH is supportive of many of the elements of SB 49. We believe with further refinement this bill can be even stronger.

Thank you for your service on behalf of all Oregonians.

Sincerely,

Mac Cunningham
Housing Developer
Community Partners for Affordable Housing

