

Submitter: Benjamin Roche

On Behalf Of:

Committee: House Committee On Housing and Homelessness

Measure, Appointment or Topic: HB4082

The -1 amendment to HB 4082 includes a significant accessibility mandate. On page 3, subsection (5)(c)(E)(iv), the amendment requires that:

“at least 80 percent of the residential units comply with the ‘Type B’ requirements applicable to units as set forth in the Standard for Accessible and Usable Buildings and Facilities published by the International Code Council...”

I support the goal of helping older Oregonians remain independent longer. Manufactured housing is already one of the most effective, naturally affordable housing types serving seniors. Thoughtful adaptability standards can strengthen that role. However, the 80% Type B mandate is not proportional to documented need and risks undermining affordability and efficient design.

What the research shows

National housing and aging data indicate:

- * Roughly 7–10% of homes with residents 55+ experience mobility-related difficulties that would benefit from accessibility modifications.
- * Among households 65+, about 10% report at least one mobility-related difficulty in areas such as stairs, bathrooms, kitchens, or bedroom access.
- * Only about 4% of homes fall into the major/critical category typically associated with full wheelchair-style accessibility needs.

This means the amendment’s 80% requirement is many times higher than the share of households likely to need the level of maneuvering geometry embedded in Type B standards.

Not all “accessibility” features are equal

There is broad support for low-cost, common-sense features, including:

- * Wall backing for future grab bars
- * Comfort-height toilets
- * Lever hardware and reachable controls

These are practical, affordable, and fit well within manufactured home construction.

The concern is with full wheelchair turning radii and circulation geometry embedded in Type B design. In compact, efficiency-driven floor plans:

- * These requirements consume valuable square footage
- * Reduce bedroom, storage, or living space
- * Limit the plan diversity that keeps manufactured housing affordable and livable for the majority of households

Applying these standards to 80% of units effectively over-engineers homes for a level of need that research shows applies to a small minority of residents.

A more reasonable, evidence-based approach

Using the 10% prevalence of mobility limitations as a baseline and applying a prudent future-growth buffer supports a targeted share of roughly 15–20% of units built with higher-level adaptability provisions, rather than 80% .

This would:

- * Ensure a meaningful supply of adaptable homes in 55+ communities
- * Align with documented and projected need
- * Preserve design flexibility and affordability for the majority of residents who will not require full Type B maneuvering clearances

Conclusion

HB 4082-1 is a positive step toward expanding housing options for older Oregonians. But the current requirement that at least 80% of units meet Type B standards is an overreaction to a legitimate need.

I urge lawmakers to revise this provision to:

- * Encourage universal, low-cost aging-ready features broadly, and
- * Set a more limited, research-supported percentage of units subject to full Type B adaptability standards.

That balanced approach better serves seniors, preserves affordability, and respects the design realities of manufactured housing.

With a reduced percentage of Type B required units in the mix, I would wholeheartedly support this legislation.

Let's not assume 80% of our seniors are going to need a wheelchair, that's

pessimistic, and impacts home design more than you may realize.