

Coalition of Gresham Neighborhood Associations

Centennial *Central City* Gresham Butte *Gresham Pleasant Valley* Historic Southeast
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[date]

TO: Sen. Chris Gorsek and Rep. Ricki Ruiz
FROM: Coalition of Gresham Neighborhood Associations

RE: Follow-Up on Middle Housing Concerns and Challenges Due to State Legislation

We are following up on the concerns and challenges we've had in Gresham with the implementation of the 2019 middle housing law as well as the challenges introduced by subsequent state legislation.

Since the 2/26/26 Northwest Neighborhood Association (Nwana) meeting when Nwana raised concerns with you about the 690 NW Angeline Ave cottage cluster project (5 cottages on a deep lot with limited frontage), we've realized more problems and challenges with these types of developments that we want to bring to your attention:

- The limited frontage creates challenges with getting all of the utilities to each of the units so that units can potentially have individual ownership in the future. Please note that the solution is NOT simply to allow overlapping utilities (which the state already allows) because most developers don't want to develop projects with common ownership of the land, plus it's important to have separate utilities with the state-required option for future middle housing land divisions.
- As noted at the Nwana meeting, fire access is a particular challenge on deep lots with multiple units, no vehicular access and minimal space between units. While the city is still able to enforce fire code and is requiring a 20' fire lane at the front of the Angeline lot, it is difficult to see how there will be 150' of fire apparatus access to all portions of the back building. Without any onsite parking, there's also a danger that cars will park in the designated fire lane, even though it will be marked "no parking".
- The limited frontage creates a real challenge for solid waste collection. In the Angeline example, the 5 cottages will have a total of 15-20 containers for garbage, recycling, yard waste and glass recycling (as well as potential extra bags) for placement at the curb each week. There isn't room for that many containers, plus they will be blocking the fire lane. City staff is exploring options with the haulers, but unfortunately there aren't great options. For instance, using common collection containers like multi-family projects do is more expensive to construct and can't be serviced by the trucks used for collection in neighborhoods.
- Room for street trees is also a challenge with all of the competition, both underground and aboveground, in the limited frontage on these types of lots. Planting street trees is especially important on densely developed middle housing lots without much room for

trees.

If you consider future legislation to encourage more housing, we ask that you oppose legislation that adds more blanket mandates for jurisdictions. Please keep in mind that the rule-making from all of the recent legislation is taking multiple years to complete and is creating a lot of uncertainty. The cumulative effects of the all of the legislation will have unknown interactions and unintended consequences. We urge you not to add more mandates.

If the legislature feels it somehow must pass more mandates, please target any mandates only to those jurisdictions that aren't providing adequate middle housing. Jurisdictions that are already accommodating middle housing should be exempt from new mandates. Gresham is still providing the most middle housing and should be exempt from any new mandates or regulations which further pre-empt local authority. If anything, there should be an easing of the mandates.

Please note that Gresham's experience with cottage cluster developments, such as the Angeline cottages, caused the city to make a code change from the its originally adopted cottage cluster code. That original code limited cottages to 900 sq.ft. footprints without any special height restrictions, resulting in 2-story 1800 sq.ft. "cottages" like the Angeline cottages. The city has since restricted the heights of cottages to 25' to make them more appropriately sized. The minimum courtyard dimensions and features were also modified to better ensure that there are actually usable courtyards for the cottage residents. We encourage you to retain and expand jurisdictions' local authority to help middle housing be successful.

Thank you for your consideration.