

June 21, 2018

Portland Planning and Sustainability Commission  
c/o Tom Armstrong  
Bureau of Planning and Sustainability  
1900 SW 4<sup>th</sup> Ave, Suite 7100  
Portland, OR 97204

Re: Manufactured Dwelling Parks (MDP) Amendments (Bonus Density Transfer Concept)

Dear Commissioners,

On behalf of the Manufactured Housing Communities of Oregon (MHCO) I am writing to update you on our recent meeting with City staff regarding our proposed suggestions to the May 7, 2018 draft of the PSC Manufactured Dwelling Parks (MDP) amendments.

On June 19, Chuck Carpenter and I met with Tom Armstrong from the Department of Planning and Sustainability, and with Linly Reese from the City Attorney's Office. In addition to our prior objections, we focused our discussion on the density transfer provisions of the MDP amendments, and suggested how they might be amended to provide greater incentives for MDP owners to achieve the City's affordable housing goals.

We began discussion by noting that based on Appendix A of the City's Manufactured Dwelling Park Inventory, under the May 7 version of the proposed ordinance, 12 MDPs would have no development rights to transfer, and 11 more would have less than 10 to transfer. Put another way, 23 out of 56 manufactured dwelling parks would have little if any TDR (transfer development rights) available under the proposed amendments. Moreover, most of these 23 MDPs are small "Mom & Pop" MDPs who will be financially strained by the proposed amendments. Providing a meaningful bonus density transfer for all MDP owners will provide a financial incentive for park owners, and it will increase affordable housing opportunities in the area where the bonus density can be transfer to. In that regard, the area where the bonus density can be transferred to should be increased, to create a broader market area for additional housing, consistent with the City's housing goals.

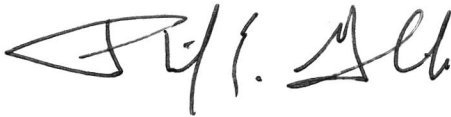
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In our discussion with staff, there seemed to be support for this concept. We would suggest that the PSC provide direction to staff to propose specific code language to implement our bonus density transfer concept, and that draft language be brought before the PSC for further discussion on or before your continued proceedings on July 10th. We will continue to work with Tom and others at the City to refine this concept as it moves forward in the process. We will also be available on July 10th to answer any questions. Thank you again for your continued cooperation.

Respectfully Submitted,

Davis Wright Tremaine LLP

A handwritten signature in black ink, appearing to read "P. Grillo". The signature is stylized and cursive.

Phil Grillo

cc: Client