

Dear Representatives,

The extreme nature of the dictates in HB 2001 and the impacts of these dictates require that every committee member carefully review the evidence -- or lack of it -- that is behind the claims that "Middle Housing" (as mandated by HB 2001) would help improve "housing affordability."

The attached, detailed analysis describes the actual consequences of HB 2001, if approved as introduced.

In addition, the actual language of this bill is defective and reflects an amateurish attempt to impose some imagined "silver bullet" for housing affordability. The inevitable outcome would be months or years of litigation to resolve the undefined terms and internal inconsistencies

In contrast, the other three attached documents are examples of *professional, evidence-based* analysis; and all of them counter the overblown claims of "Middle Housing" proponents.

The two Harvard studies reinforce the widely understood fact that the largest group of "housing cost-burdened" households and the households most severely stressed occur in the "Extremely Low Income" and "Very Low Income" categories. In addition, these studies establish that market-rate solutions, especially with small multi-unit structures, will not address these households' needs to any significant degree.

The Montgomery County analysis illustrates how context-dependent is the appropriate and effective development of "middle housing" forms; and jamming them into established, older single-family neighborhoods would be *counter-productive*.

The Montgomery County analysis also explains what any experienced developer already knows -- market-rate "middle housing" forms are only "missing" because they are high-risk and low-return. As the report explains, there is a "barbell" effect -- small-scale developers stay with what they know -- tried-and-true single-family houses. Large-scale developers build higher-risk, but much higher return apartments; and the only context in which duplexes, triplexes or quadplexes work is very large scale developments over a large "greenfield" -- not as one-off infill.

At your hearing, after the "middle housing" proponents extol the 1930s-era virtue of "middle housing" on street-car lines, ask them for the evidence of how many units HB 2001 will deliver in Eugene, Corvallis, Bend, Redmond, Hood River, McMinnville and all the other Oregon cities; and, most importantly, at what price-point the market is going to deliver these units.

Also ask them to point to a single example of a town or city in which a "missing middle" development or program (within the last five years) has produced a significant number of dwellings that meet the "affordable" criteria (decent, suitable housing costing no more than

30% of household income that is 80% of AMI or below) without some form of subsidy. (I've asked the DLCD staff for an example, and they haven't been able to produce a single example.)

Thank you for your consideration and service.

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