

From: [Mike Perham](#)
To: [DLCD Housing * DLCD](#)
Subject: MHOR comments
Date: Sunday, July 5, 2026 12:24:06 PM

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Hi DLCD, a few comments on the new MHOR rules:

1. It seems odd to limit the unit count to "fewer than 12". We want to be able to build 3 story single stair buildings by right everywhere in OR and have the MHOR rules allow for a 12 unit 3 floor single stair building. Otherwise I can provide 11 units and ground floor amenity space like a bike parking room but that removes a potential ground floor accessible unit.
2. The single stair rule optionally allows 4 floors now, it would be nice to see the MHOR unit count go up to 16 units so we can maximize the affordability of the units within the building under the rules today.
3. Increased 10' setbacks at 35' will trigger for 4 floor buildings and make them hard to site on many urban lots where we want to incentivize density. It would be nice to see setback flexibility where one side can be reduced to 5ft for better siting, to save a big tree, etc.

Mike and Neil
Heller Development
Portland, OR