



August 1, 2017

Clackamas County Planning Commission  
Development Services Building, 2nd floor  
150 Beavercreek Road  
Oregon City, OR 97045

**Re: File ZDO-267, Proposed Comprehensive Plan and Zoning and Development Ordinance Amendments—Transitional Shelter Communities**

Dear Clackamas County Planning Commission:

This letter is submitted jointly by Housing Land Advocates (HLA) and the Fair Housing Council of Oregon (FHCO). Both HLA and FHCO are non-profit organizations that advocate for land use policies and practices that ensure an adequate and appropriate supply of affordable housing for all Oregonians. FHCO's interests relate to a jurisdiction's obligation to affirmatively further fair housing. Please include these comments in the record for the above-referenced proposed amendment.

The County's decision to increase the amount of land available for transitional housing is laudable. However, the proposed amendment does not merely concern whether transitional shelter communities may be permitted as a conditional use in industrial zones. The amendment includes broader issues such as the definition of transitional shelter community, and the adoption of standards for transitional housing developments. HLA and FHCO are concerned about the lack of standards for determining whether the location of a proposed transitional shelter community will allow a safe location for the residents of the proposed developments. Industrial zones are often remote from the infrastructure and services—such as schools, grocery stores, public parks, *et cetera*—that support the needs of people transitioning from homelessness. Further, industrial areas could be subject to hazardous substances that have not been analyzed for health effects on residents in a transitional shelter, and no proposed criteria addresses this issue.

HLA and FHCO would be more comfortable with preservation of zoning for particular purposes and would suggest that the County rezone under-utilized industrial land that could support quality housing stock to residential use, rather than allowing a conditional residential use in an



otherwise industrial area. This could be a legislative decision making process, and we recognize that careful consideration of Measure 49 implications would be required, it could be that rezoning to residential increases the value of certain under-utilized industrial areas. Further, allowing transitional shelter communities on industrial land could undermine the County's industrial land supply targets by turning industrial land into housing land. The unintended consequences of allowing this residential use on industrial land could include acting as a basis to justify industrial land demands related to future re-zonings, boundary expansions, and annexations within the County, member, or surrounding jurisdictions.

HLA and FHCO urge the Commission to defer adoption of the proposed amendment until an analysis of the viability of a transitional shelter sites is available. Thank you for your consideration. Please provide written notice of your decision to, FHCO, c/o Louise Dix, at 1221 SW Yamhill Street, #305, Portland, OR 97205 and HLA, c/o Jennifer Bragar, at 121 SW Morrison Street, Suite 1850, Portland, OR 97204. Please feel free to email Louise Dix at [ldix@fhco.org](mailto:ldix@fhco.org) or reach her by phone at (541) 951-0667.

Thank you for your consideration.

A handwritten signature in blue ink that reads "Louise Dix".

Louise Dix  
AFFH Specialist  
Fair Housing Council of Oregon

A handwritten signature in blue ink that reads "Jennifer Bragar".

Jennifer Bragar  
President  
Housing Land Advocates

cc: Gordon Howard ([gordon.howard@state.or.us](mailto:gordon.howard@state.or.us))