



March 20, 2018

City of Salem Planning Commission  
555 Liberty Street SE, #305  
Salem, OR 97301

**Re: West Salem Zone Code Clean-Up CA18-01**

Dear Commissioners:

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.

All amendments to zoning code must comply with the Statewide Planning Goals. ORS 197.175(2)(a). The attached staff report details the proposed code amendments and states it will "boost [] the supply of land available for medium to high density residential uses in West Salem." The proposed amendments, however, do not set forth clear and objective procedures and standards. ORS 197.831. Specifically, under the proposed Edgewater/2nd Street Mixed-Use Corridor area zoning, there does not appear to be a standard for "permitted use." Additionally, it is unclear how the City will be verifying how use permission will be determined. At minimum, the administrative process should be noted in the amendments.

HLA and FHCO urge the Commission to defer adoption of the proposed amendments until these issues are addressed. HLA and FHCO plan to monitor the development process. 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 black 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))