



February 13, 2018

City of Happy Valley Planning Commission
16000 SE Misty Drive
Happy Valley OR 97086

Re: CPA-09-17/LDC-12-17 East Happy Valley Comprehensive Plan Update

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.

As you know, all amendments to the Comprehensive Plan and Zoning Map must comply with the Statewide Planning Goals. ORS 197.175(2)(a). The attached staff report suggests that the City will meet Goal 10 because all of the proposed zone changes allow for various types of housing. However, HLA and FHCO have consistently commented that Happy Valley is in need of additional multi-family housing land and actualized development of such multi-family housing. See Exhibits A and B attached hereto that have previously been submitted by HLA and FHCO that show the exclusionary nature of land use policies in Happy Valley that appear to be having a disparate impact on protected classes. HLA and FHCO are concerned that imprecise findings or a lack of adequate conditions may lead to a lack of follow through, to the detriment of the City's inventory of buildable land, and compliance with Goal 10. Since the staff report does not fully analyze the loss of residential land versus gain in Community Corridor Commercial ("CCC"), nor analyze what impact this could have on housing, we request that Happy Valley condition the properties that will be zoned to CCC to limit development to housing allowed under that zone – medium or high density residential use, senior living, skilled nursing facility, or congregate care.



HLA and FHCO urge the Commission to reject the proposed amendment unless adequate conditions are imposed. 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 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)

'Richest town in Oregon' may surprise you



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on June 23, 2015 at 10:41 AM, updated June 23, 2015 at 12:15 PM

The website 24/7 Wall St. recently pored through Census data to come up with a list of the richest towns in each state. For their list, the site's editors stuck to only incorporated towns with 25,000 or fewer residents. (Sorry, Lake Oswego and West Linn.)

Even so, **the town at the top** [<http://247wallst.com/special-report/2015/06/17/the-richest-town-in-each-state/9/>] will likely surprise a lot of people. Happy Valley has more often been in the news for its unprecedented over-development just before the Great Recession, and subsequent real estate collapse. Images of empty subdivisions are rooted in many Oregonians' minds when it comes to Happy Valley.

But 24/7 Wall St. found Happy Valley's median income of \$92,773 to be tops in Oregon. **At the other end of the spectrum: Prineville** [<http://247wallst.com/special-report/2015/06/05/the-poorest-town-in-each-state/9/>], long one of the areas with the highest unemployment in the state, and a median income of \$29,959.

The gap between richest small town and poorest small town puts Oregon about in the middle of the pack nationally, the website said.

-- The Oregonian/Oregonlive.com

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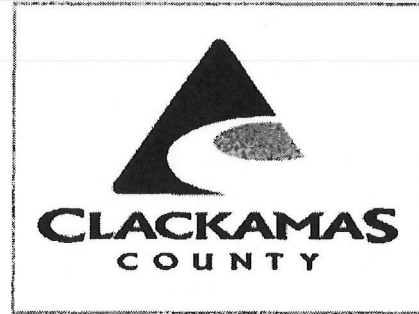
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EXHIBIT A



2012-2016 CONSOLIDATED PLAN FOR HOUSING AND COMMUNITY DEVELOPMENT

**CLACKAMAS COUNTY
COMMUNITY DEVELOPMENT DIVISION**

Health, Housing
& Human Services 
CLACKAMAS COUNTY

April 2012

EXHIBIT B

A few examples illustrate the rich history of the County and its cities. Canby, in its early days, boasted an abundant crop of wild strawberries. Early settlers grew apples to ship to gold miners in California. Canby remains a rich agricultural area today. Speculation in real estate in the late 1800s in Gladstone, followed by an auditorium seating 3,000 people in 1895 brought people from all around for "concerts, ball games and sermons by evangelists such as John Phillip Sousa, Billy Sunday and William Jennings Bryant."²

Oregon City is the oldest city, as mentioned above, and is located at the end of the Oregon Trail. Before that settlement though, the area had been a focal point for fishing and trade among Native Americans. Early fur traders were gradually replaced by more permanent settlers, including missionaries in the 1830s and steamboat transportation in the 1850s which fostered transportation of agricultural and timber products spurred by the needs of the gold rush in California. Population and industry in the County continued to grow and diversify. Wilsonville is a relatively new city in the County and is home to several modern corporate headquarters.

POPULATION

Population Growth

Table 1: Clackamas County Population 1990-2010*

Location	1990	2000	2010	Change 2000-2010
Oregon	2,842,321	3,421,399	3,831,074	12%
Clackamas County	278,850	338,391	375,992	11%
Barlow	118	140	135	-4%
Canby	8,990	12,790	15,829	24%
Damascus			10,539	n/a
Estacada	2,016	2,371	2,695	14%
Gladstone	10,152	11,438	11,497	1%
Happy Valley	1,519	4,519	13,903	208%
Johnson City	586	634	566	-11%
Lake Oswego**		35,278	36,619	4%
Milwaukie	18,670	20,490	20,291	-1%
Mollala	3,637	5,647	8,108	44%
Oregon City	14,698	25,754	31,859	24%
Rivergrove**		324	289	-11%
Sandy	4,154	5,385	9,570	78%
West Linn	16,389	22,261	25,109	13%
Wilsonville**		13,991	19,509	39%

*Portland and Tualatin not included, although portions lie in the County.

**Data provided for entire city, although part outside Clackamas County.

Source: U.S. Census; Portland State University, Population Research Center

Clackamas County population grew by 11% between 2000 and 2010, according to the census, which was about half the rate of growth as that a decade earlier (21% change from 1990 to 2000). These rates are similar to those in Oregon State for the same periods. The change in individual cities is much more varied. Some cities shown in Table 1 had not been incorporated in 1990 and Damascus was not incorporated until after the 2000 census.

In addition to the cities shown in the Table 1, small portions of Tualatin and Portland lie in Clackamas County, but are not considered separately in this document. Several areas in the County

are recognized under the Hamlets and Villages program, which is a grassroots, citizen-driven program developed by the County. The hamlets are Beavercreek, Molalla Prairie, Mulino and Stafford and the single village is the Villages at Mt. Hood. Clackamas County is a mixture of urban and rural. Agriculture is

² (www.oregon.com)

Table 6: Race 2010

Location	Race*						Total Population
	White	Black/ African Am.	AK Native/ Am. Indian	Asian	Other	Multiple	
Oregon	84%	2%	1%	4%	6%	4%	3,831,074
Clackamas County	88%	1%	1%	4%	3%	3%	375,992
Barlow	81%	1%	1%	0%	14%	4%	135
Canby	81%	1%	1%	1%	13%	3%	15,829
Damascus	91%	1%	1%	3%	1%	3%	10,539
Estacada	92%	1%	1%	1%	3%	2%	2,695
Gladstone	89%	1%	1%	2%	4%	4%	11,497
Happy Valley	76%	1%	<1%	17%	1%	4%	13,903
Johnson City	84%	<1%	1%	2%	7%	5%	566
Lake Oswego	89%	1%	<1%	6%	1%	3%	36,619
Milwaukie	89%	1%	1%	2%	3%	4%	20,291
Mollala	87%	1%	1%	1%	8%	3%	8,108
Oregon City	91%	1%	1%	2%	3%	3%	31,859
Rivergrove	94%	0%	0%	3%	<1%	2%	289
Sandy	90%	<1%	1%	1%	4%	3%	9,570
West Linn	91%	1%	<1%	4%	1%	3%	25,109
Wilsonville	85%	2%	1%	4%	5%	3%	19,509

*Race alone; may also be Hispanic.

Source: 2010 U.S. Census

Table 7: Ethnicity 2010

Location	Ethnicity*		Total Population
	Hispanic	Non-Hispanic	
Oregon	12%	88%	3,831,074
Clackamas County	8%	92%	375,992
Barlow	15%	85%	135
Canby	21%	79%	15,829
Damascus	4%	96%	10,539
Estacada	8%	92%	2,695
Gladstone	9%	91%	11,497
Happy Valley	4%	96%	13,903
Johnson City	15%	85%	566
Lake Oswego	4%	96%	36,619
Milwaukie	7%	93%	20,291
Mollala	14%	86%	8,108
Oregon City	7%	93%	31,859
Rivergrove	2%	97%	289
Sandy	9%	93%	9,570
West Linn	4%	96%	25,109
Wilsonville	12%	88%	19,509

*May be of any race.

Source: 2010 U.S. Census

Table 7 shows 2010 data on ethnicity of County residents, along with residents of Oregon and cities in Clackamas County. Of the more populated cities, Canby and Molalla had the highest percentages of Hispanic/Latino residents (21% and 14% respectively).

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- Lower education levels are associated with higher unemployment and lower wages:
 - Less than high school diploma: median earnings \$444/week; unemployment 14.9.
 - High school diploma: median earnings \$626/week; unemployment rate 10.3.
 - 4-year degree: median earnings \$1,038/week; unemployment rate 5.4.
 - Job losses since 2007 have been greatest and gains lowest for less-educated workers. The trends are predicted to continue – to be “far reaching and long lasting” and to “mark a dramatic shift away from low-skilled labor.”
 - Unemployment is highest for young people (< 25) and higher still for minority youth. Youth may feel more pressured to work than enroll in college, or to work and enroll part-time, which increases the time and barriers to a college degree.
 - Overall 91% of County residents age 25 and over had a high school degree or better; yet, just 58% of Hispanics had a high school degree or better.
 - 12% of 2009-2010 graduating class in 10 districts in Oregon dropped out of school and did not graduate with their class.
 - Failure to graduate affects both the student and the community: Cutting the number of students who dropped out in Oregon (from 11,800) would result in: \$59 million in increased annual earnings, \$44 million in annual spending and \$72 million in economic growth.

Income/Poverty

- Median household income in Clackamas County (\$62,030) was higher than in Oregon, but there was substantial differences in cities – from \$100,510 in Happy Valley and \$89,118 in West Linn to just \$23,438 in Johnson City and \$36,713 in Estacada.
 - Low income households are struggling: 17% of County households have incomes <\$25,000; 26% of County households have incomes <\$35,000.
 - Poverty has increased in the County – 6.7% of the population lived in poverty in 2000 and by 2010 the estimate had risen to 10.4%. Nearly half of female householders with young children under 5 lived in poverty.
 - Rise in poverty and unemployment is accompanied by more doubled up households and more adult children living at home.
 - Federal poverty (FPL) thresholds underestimate the income needed to live:
 - Single adult with 1 preschooler needs \$44,337 to meet basics (301% of FPL)
 - TANF for single parent in family of 3 in Oregon was \$485 as of July 2010
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Table 25 shows types of units within the County's incorporated cities, as estimated in the 2005-2009 American Community Survey. While 72% of units in the County were single family (attached or detached), this varied by city. Notably, the cities of Barlow, Damascus, Happy Valley and Rivergrove had almost exclusively single family units. Wilsonville had a slight majority of multifamily units and the majority of units in Johnson City were mobile homes.

- Demand for rental units is increasing with foreclosures and reducing vacancies, which makes it even more difficult to find affordable housing.
- The current housing stock will be insufficient to meet the needs of an aging population for affordable housing.
- Given the slow development in this economy, the focus on housing should be on maintaining existing housing, including rehabilitation of rental properties.

(Interviews/focus group participants)

Table 25: Type Units by City

Location	Total Units	Type of Unit		
		Single Family*	Multi-family	Other**
Clackamas County	156,945	72%	21%	7%
Barlow	45	95%	0%	5%
Canby	5,890	72%	22%	6%
Damascus	3,769	92%	0%	8%
Estacada	1,155	62%	30%	9%
Gladstone	4,779	67%	27%	6%
Happy Valley	4,708	91%	9%	0%
Johnson City	278	4%	0%	96%
Lake Oswego	16,995	72%	28%	<1%
Milwaukie	9,138	68%	31%	1%
Mollala	3,017	77%	17%	6%
Oregon City	12,900	71%	25%	4%
Rivergrove	133	99%	0%	1%
Sandy	3,768	73%	20%	7%
West Linn	10,035	83%	17%	<1%
Wilsonville	8,487	46%	51%	3%

* Detached and attached.

** Mobile homes, boat, RV, van, etc.

Source: 2010 Census (total); 2005-2009 American Community Survey (type of units)

Mobile homes accounted for 7% of housing units in Clackamas County (Table 21). Mobile homes can be an affordable housing option for lower income households, both as rentals and as owner-occupied units. Mobile home parks (manufactured home parks) sometimes sit on land attractive for redevelopment. The condition of some of the units constructed prior to the 1978 revised national standards may have deteriorated rendering them unsuitable for rehabilitation.

Still, a recent study of several manufactured home parks (MFH) in Clackamas County found that, in light of better quality of current construction, continued steps to preserve MFH is warranted and suggests additional steps to sustain this affordable housing option.⁷ The parks included in the study were in three

locations along transportation corridors in unincorporated Clackamas County and represented 23% of mobile homes in the County. Park closures for redevelopment displace low-income individuals and families. Three parks closures in Clackamas County since 1999 displaced 349 tenants, including many elderly tenants.

⁷ Sirois, M. (2011). *Study of Manufactured Home Parks in Selected Areas of Clackamas County, Oregon*. Masters thesis at Portland State University.