



January 24, 2018

City of Clatskanie Planning Commission  
75 S. Nehalem Street  
Clatskanie, OR 97016

**Re: Zone Map Amendment, MFR to C1 - 115 East Columbia River Highway;  
map/taxlot 70408DC/900**

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 may know, all amendments to the Comprehensive Plan Map and Zoning map must comply with the Statewide Planning Goals. ORS 197.175(2)(a). Although the staff report refers to Goal 10 and asserts that Clatskanie does not have a shortage of buildable residential land, it does not refer to the City's Buildable Land Inventory to show that fact.

When a decision is made affecting the residential land supply, the City must refer to its Housing Needs Analysis and Buildable Land Inventory (BLI) to show that an adequate number of needed housing units (both housing type and affordability level) will be supported by the residential land supply after enactment of the proposed change.

While the staff report suggests a trade off between commercial and residential demand, it has not examined the impacts to the BLI. The City must demonstrate that its actions do not leave it with less than adequate residential land supplies in the types, locations, and affordability ranges affected. *See Mulford v. Town of Lakeview*, 36 Or LUBA 715, 731 (1999) (rezoning residential



land for industrial uses); *Gresham v. Fairview*, 3 Or LUBA 219 (same); see also, *Home Builders Assn. of Lane County v. City of Eugene*, 41 Or LUBA 370, 422 (2002) (subjecting Goal 10 inventories to tree and waterway protection zones of indefinite quantities and locations). Only with a complete analysis showing any gain in needed housing as compared to the BLI can housing advocates and planners understand whether the City is achieving its goals through code amendments.

We understand that Clatskanie does not have a recently updated housing needs analysis or buildable lands inventory. The housing section of your plan does not appear to have been updated since the original plan was adopted in the 1980's. We would urge you to make updating your housing needs analysis and buildable lands inventory a priority. There are grant funding opportunities from the state to help pay for this work.

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)