



March 6, 2018

City of King City Planning Commission
King City City Hall
15300 SW 116th Avenue
King City, OR 97224

Re: 18-010 Housing Needs Analysis

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 file.

As you are no doubt aware, the City's Housing Needs Analysis will be vital to the Commission's efforts to ensure compliance with Goal 10 going forward, since all amendments to the Comprehensive Plan Map and Zoning map must shown to comply with Goal 10, and since an adequate showing of compliance with Goal 10 would include reference to the City's Housing Needs Analysis. See ORS 197.175(2)(a).

The City's Housing Needs Analysis (HNA) shows that the City faces a difficult situation in terms of both available housing stock, mix of housing types, and availability of developable land reserved for residential development. See Housing Needs Analysis at *i et seq.* HLA and FHCO do not lay blame for this situation at the City's, or at the Commission's feet. The existence of a separate set of laws and rules governing compliance with Goal 10 in the Portland Metro area has given rise to the notion that compliance with Goal 10 is Metro's sole responsibility. See e.g. OAR 660-007. The problems faced by the City, as identified in the Housing Needs Analysis, suggest that, as a practical matter, Metro is not effectively ensuring Goal 10 compliance.



According to the HNA,

- More than half of King City households cannot afford a two-bedroom apartment at HUD's fair market rent level of \$1,242.
- King City currently has a deficit of housing units that are affordable to households earning less than \$50,000.
- About 40% of King City's households are cost burdened, with 56% of renters and 36% of owners paying more than 30% of their income on housing.

If the City's boundary expands, we hope that King City works closely with Metro to ensure regional fair share of housing, and that the mix and density standards are applied in the best way to address housing affordability. In addition, we encourage King City to position itself to update its HNA if the boundary expands, and consider obtaining funding under HB 4006 to accomplish this goal.

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 dark ink that reads "Louise Dix".

Louise Dix
AFFH Specialist
Fair Housing Council of Oregon

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

Jennifer Bragar
President
Housing Land Advocates

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

