



October 24, 2019

City of Gresham Planning Commission
1333 NW Eastman Parkway
City of Gresham Gresham, OR

Re: Plan Map Amendment from Industrial Springwater (IND-SW) to Low Density Residential-Springwater (LDR-SW) for a 2.26-acre portion of Tax Lot 01200 Section 1S3E23A (PMA 19-26000341)

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, and as reflected in the staff report, all amendments to the City's Comprehensive Plan and Zoning map must comply with the Statewide Planning Goals. ORS 197.175(2)(a). When a decision is made affecting the residential land supply, the City must refer to its Housing Needs Analysis (HNA) and Buildable Land Inventory (BLI) in order 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.

The staff report for the proposed Plan Map Amendment and zone change recommends its approval, despite the staff report acknowledging that it has "insufficient information" to determine the changes' effects on City housing. The only conclusion the report states is that the building of any housing within the City will decrease prices due to an increase in supply. Such speculation does not constitute an adequate factual basis. Goal 10 findings must demonstrate that the proposed changes do not leave the City 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 Cty. 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). Further, the report should reference the City's HNA to demonstrate the effects of these changes. Only with a complete analysis showing any gain or loss in needed housing as compared to the BLI can housing advocates and planners understand whether the City is achieving its goals through this Plan Map Amendment and zone change.

HLA and FHCO urge the Commission to defer approval of File No. PMA 19-26000341 until Goal 10 findings are revised in order to provide an adequate factual basis through evaluation under the HNA and BLI. 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 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: Kevin Young (kevin.young@state.or.us)