



July 23, 2019

County of Washington Planning Commission
161 NW Adams Avenue
Hillsboro, OR 97123

Re: PROPOSED ORDINANCE NO 857: Comprehensive Framework Plan for the Urban Area, the Aloha-Reedville-Cooper Mountain Community Plan, and the Community Development Code to Adopt Pedestrian-Oriented Mixed-Use Districts, and Apply Them in the Aloha Town Center

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 County'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 County 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 ordinance does not include findings for Statewide Goal 10, describing the effects of the prospective changes within the Aloha town center on the housing supply within the County. Goal 10 findings must demonstrate that the changes do not leave the County 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, because the purpose of the ordinance is to encourage new development of a certain type, the report should reference how these changes align with the housing needs as dictated by Washington County's HNA. 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 County is achieving its goals through Ordinance 857.

HLA and FHCO urge the Commission to defer recommending adoption of Ordinance 857 until Goal 10 findings can be made, and the proposal evaluated 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)