



December 6, 2016

City of Prineville Planning Commission
387 NE Third Street
Prineville, Oregon 97754

Re: AM-2016-104: Amending the Comprehensive Plan Map from heavy Industrial to Residential; and the Zoning Map from Light Industrial to general Residential for 33.00 acres located at T14, R16, S31A, and TL100.

Dear Prineville Planning Commission:

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 concerns relate to a jurisdiction's obligation to affirmatively further fair housing. Please include these comments in the record for the above-referenced proposed amendment.

The proposed amendment to the Comprehensive Plan Map and Zoning Map must be in compliance with the Statewide Planning Goals. ORS 197.175(2)(a). However, the staff report for this proposal does not fully consider Statewide Planning Goal 10 (Goal 10).

HLA and FHCO applaud the City's aim of increasing its residential land supply. However, when a decision is made affecting the residential land supply, the City must undertake a complete Goal 10 analysis. Goal 10 requires the City to inventory buildable lands for residential use and to use that inventory to show that an adequate number of needed housing units can be supported with the residential supply after the proposed change is enacted. While Goal 10 is mentioned in the staff report, there is not a complete Goal 10 analysis.

Even when increasing the residential land supply, the City must undertake a full analysis to show that it is adding needed residential zones (e.g. multifamily vs. single-family). For instance and in

1221 SW Yamhill Street, Portland, Oregon 97205



light of the articles provided in Exhibit E of the staff report, it may be better planning for a different residential zoning designation to be applied to allow this property owner or a subsequent one to have more options for multi-family housing and increased density. The staff report does not address the potential impact of the proposal on the City's Goal 10 obligations. 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. *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).

HLA and FHCO urge the Commission to defer adoption of the proposed amendment until its impact on the City's Goal 10 obligations is fully and adequately analyzed and documented.

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.

Sincerely,

A handwritten signature in cursive script that reads "Louise L. Dix".

Louise Dix
AFFH Specialist
Fair Housing Council of Oregon

A handwritten signature in cursive script that reads "Jennifer Bragar".

Jennifer Bragar
President
Housing Land Advocates