

**STAFF REPORT**  
**TYPE IV HEARING - COMPREHENSIVE PLAN AMENDMENT**

**Housing Amendments as part of the Housing Production Strategy Project**

**TO:** Gresham Planning Commission

**FROM:** Ashley Miller, Interim Urban Design and Planning Director  
Mary Phillips, Interim Comprehensive Planning Manager  
Terra Wilcoxson, Senior Planner, UDP  
Sarale Hickson, Planner II, UDP

**HEARING DATE:** April 10, 2023

**REPORT DATE:** March 31, 2023

**FILE NUMBER:** CWP-23-00142

**PROPOSAL:** To adopt Comprehensive Plan text amendments to Volume 1 (Findings) and Volume 2 (Policy) of the Gresham Community Development Plan (GCDP). These amendments update the GCDP. The amendments include new and updated demographic data, housing context, and housing goals, policies, and action measures. The changes are as follows:

- Amend Volume 1 to include new and updated data regarding people experiencing homelessness and information on the risks of gentrification and displacement across the city.
- Amend Volume 2 to include:
  - New context regarding housing for protected classes, affordability, people experiencing homelessness, and the risks of gentrification and displacement; and
  - Revised Goals, Policies, and Action Measures in response to the new housing data and recent public input.

**EXHIBITS:**

- A. Proposed Comprehensive Plan (GCDP) Text Amendments with its attachments
  - Attachment A. Draft Volume 2, Section 10.600 Housing
  - Attachment B. Draft Volume 1, Appendix 19 Trends in Gentrification and Displacement Risk in Gresham
- B. Community Engagement and Outreach Report
- C. Public Comment

*Note: The proposed text amendments to Section 10.600 are provided in both Exhibit A and Attachment A. Exhibit A includes the existing and proposed text. Attachment A includes a clean copy of the proposed update.*

**RECOMMENDATION:** Staff recommends that the Planning Commission recommend adoption of the proposed Comprehensive Plan text amendments, CWP-23-00142,

to the City Council based on the findings, conclusions, and recommendations in the March 31, 2023 staff report.

## SECTION I - EXECUTIVE SUMMARY

This Type IV Comprehensive Plan Amendment is part of Gresham's Housing Production Strategy Project. The City of Gresham designed this project to contain two components that go hand in hand:

- Comprehensive Plan Amendments to the Housing Sections of Volume 1 and 2 (the subject of this Staff Report and the Planning Commission Hearing on April 10, 2022). This is an update to a land use document that City Council will consider adopting by **ordinance** at a public hearing on May 2, 2023. These updates are the second phase of housing updates in the comprehensive plan. Phase I was completed in 2021 with the Housing Capacity Analysis Project.
- Gresham's Housing Production Strategy (HPS), a 6-year plan to support the production of housing needed by Gresham's current and future residents. This is not a land use document. City Council will consider adoption of the HPS by **resolution** at a public meeting on May 2, 2023. This document is not subject to Planning Commission review and recommendation.

The project (including the comprehensive plan amendments proposed herein) are in response to House Bill 2003 (HB 2003), adopted by the State Legislature in 2019. HB 2003 was adopted to help communities meet the diverse housing needs of Oregonians and requires cities to develop strategies to encourage production of needed housing. The Bill requires the City to adopt a Housing Capacity Analysis (completed by Gresham in 2021 as Phase 1 of the Comprehensive Plan Amendments to the Housing Sections of Volume 1 and 2), and then a Housing Production Strategy. The currently proposed comprehensive plan amendments are the second and final phase of the Comprehensive Plan Amendments to the Housing Sections of Volume 1 and 2. The proposed amendments are aligned with the HPS, for the purpose of unifying the City's land use and operational housing goals and policies. They also build on the Housing for All priority in the City's 2022-2025 Strategic Plan. The Housing for All goal reads:

*Everyone in Gresham can live in a secure and reliable place they call home, and no one experiences housing uncertainty. All Gresham community members can access housing that meets their changing needs and wants.*

### Primary Changes

The proposed amendments apply to Volume 1 and 2 of the GCDP; the proposal includes new content revisions, clarifications, and reformatting. These changes align with state laws and with local policy direction.

Volume 1 contains factual information that is the basis for the policies found in Volume 2 of the Comprehensive Plan. Volume 1, Section 4.800 2021-2041 Housing Capacity Analysis was amended in 2021 to reflect the Housing Capacity Analysis that was required by HB 2003.

Volume 2 contains housing policy statements and implementation strategies that form the basis for land use activities. Volume 2, Section 10.0600 Housing was also amended in 2021 with the Housing Capacity Analysis Project. However, the Goals, Policies, and Action Measures were not reviewed with that update because City staff knew the Housing Production Strategy was required and would include more complete data to inform how the City addresses housing policies.

The primary proposed changes involve:

- i. Adding information about the risks of gentrification and displacement.
- ii. Adding new and updated data regarding income, race, ethnicity, disability status, and housing status.
- iii. Updating language to reflect that Section 4.800 is part of the GCDP rather than a stand-alone report.
- iv. Repealing Volume 1, Appendix 19 Summary of Assisted Housing in Gresham and replacing it with Appendix 19 Trends in Gentrification and Displacement Risk in Gresham.
- v. Removing housing action measures related to CDBG/HOME funding or superseded by the 2022 Middle Housing Code Update.
- vi. Correcting grammar and updating terms.
- vii. Updating language for consistency.
- viii. Revising background language for clarity to more closely reflect Gresham's current housing situation, and to acknowledge Gresham's current housing initiatives.
- ix. Adding recent legislation (Middle Housing and Middle Housing Land Divisions).
- x. Clarifying statistics on cost burden.
- xi. Removing outdated and/or redundant information on economic development, livability, rehabilitation/revitalization, City roles, and summarizing housing issues.
- xii. Updating the Housing Goals, Policies, and Action Measures.

Amendments to the Gresham Community Development Plan's (GCDP) Volume 3 (Development Code), are described in the following section titled "Proposed Comprehensive Plan Amendments Overview". Throughout this staff report, as in the GCDP, the synonymous terms "GCDP" and "Comprehensive Plan" are used interchangeably. Similarly, "GCDC", "Development Code", and "Volume 3 of the GCDP" are terms used interchangeably to refer to the same document.

### **Citizen Involvement and Outreach**

The Planning Commission and City Council have reviewed the project. Staff has incorporated their direction into the proposed code amendments. The project outreach activities are included in Exhibit B Community Engagement and Outreach Report.

Notice of the Development Code changes were sent to the Department of Land Conservation and Development (DLCD) and Metro on March 6, 2023. Notice of the April 10, 2023 Planning Commission hearing was published in the Gresham Outlook on March 31, 2023. Notice of the May 2, 2023 City Council hearing will be published in the Gresham Outlook no later than April 4, 2023. A Measure 56 notice is not required for this comprehensive plan amendment.

### **Public Comments**

As of the date of this report the following public comments were received:

- On March 22, 2023 Metro submitted an email stating that they had no comment. The email is included in Exhibit C.

- On April 2, 2022 a representative from the Fair Housing Council of Oregon requested the staff report and all attachments via email and stated, “If we do have any commentary or concerns my colleague Sam Goldberg will be in touch to advise.” The email is included in Exhibit C.

### **Proposed Comprehensive Plan Amendments Overview**

The overview provided below summarizes the changes proposed to the Gresham Community Development Plan (GCDP). Updates are proposed to Volume 1 and Volume 2. The full text of the proposed updates is provided in Exhibit ‘A’ (formatted in ~~strikeout~~/underline) and its attachments.

### **Volume 1 – Findings**

The following amendments are proposed:

- Section 4.800 Housing Capacity Analysis is updated to:
  - Revise language to clarify it is part of the GCDP rather than a stand-alone report,
  - Add information about the trends and risks of gentrification and displacement from the proposed Appendix 19 Trends in Gentrification and Displacement Risk in Gresham,
  - Refine information about people experiencing homelessness based on new and updated data and analysis.
- Appendix 19 Summary of Assisted Housing in Gresham is repealed due to being outdated. It is replaced by Appendix 19 Trends in Gentrification and Displacement Risk in Gresham.

### **Volume 2 – Policies**

- Section 10.314 Downtown Plan District is amended to remove action measures related to CDBG/HOME processes.
- Section 10.318 Gresham Civic Neighborhood is amended to update terminology.
- Section 10.319 Central Rockwood Area is amended to:
  - Update language for consistency,
  - Remove action measures related to CDBG/HOME processes; these action measures are too specific for the GCDP.
  - Remove an action measure superseded by the 2022 Middle Housing Code Update.
- Section 10.600 Housing is amended to:
  - Revise background information for clarity and to more closely reflect Gresham’s current housing situation,
  - Add Gresham’s current housing initiatives,
  - Add recent legislation (Middle Housing and Middle Housing Land Divisions),
  - Correct grammar,
  - Update housing terms,

- Clarifying statistics on cost burden,
- Add new local statistics on income, race, ethnicity, disability status and housing status,
- Add information on gentrification and displacement,
- Remove outdated and/or redundant information on economic development, livability, rehabilitation/revitalization and City roles,
- Remove the outdated summary of issues,
- Updating the Housing Goals, Policies, and Action Measures.
- Section 10.703 Pleasant Valley District: Residential Land Use/Neighborhood is amended update language for consistency.
- Section 10.804 Springwater Plan District: Livability is amended to update language for consistency.

### **Staff Report Organization**

- Section II identifies applicable Gresham Community Development Plan procedures and provides regulatory findings.
- Section III identifies applicable Gresham Community Development Plan Goals and provides regulatory findings.
- Section IV identifies the Metro Urban Growth Management Functional Plan (UGMFP) Titles that apply to the proposal and provides regulatory findings.
- Section V identifies the Oregon Statewide Planning Goals that apply to the proposal and provides regulatory findings.
- Sections VI and VII summarize staff conclusions and recommendations.
- Exhibit 'A' and its attachments include the proposed Gresham Community Development Plan text amendments.
- Exhibit 'B' includes the Community Engagement and Outreach Report.
- Exhibit 'C' includes the Public Comment received by the date of this staff report.

### **SECTION II - APPLICABLE COMMUNITY DEVELOPMENT CODE (GCDC) (Volume 3) PROCEDURES**

#### **Volume III Development Code:**

- Section 11.0200     Initiation and Classification of Applications
- Section 11.0600     Type IV Legislative Procedures
- Section 11.1000     Public Hearings

## **Section 11.0200 - Initiation and Classification of Applications**

### **11.0201 – Initiation of an Application.**

This section provides that City Council may initiate a Type IV legislative application to amend the Community Development Plan.

#### Findings:

This project was initiated by City Council on July 20, 2021. City Council will review these amendments at a hearing on May 2, 2023.

### **11.0203 and 11.0204 – Classification of Applications and Review Authorities.**

These sections provide that Type IV procedures are legislative and typically involve the adoption, implementation, or amendment of policy by ordinance. They also provide that the Planning Commission provide a recommendation on Community Development Plan Amendments and the City Council be the decision-making authority.

#### Findings:

This project meets those conditions and is being processed under the Type IV procedures and will be heard by the Planning Commission on April 10, 2023 and the City Council on June 6, 2023.

## **Section 11.0600 – Type IV Legislative Procedures**

### **11.0602(A) and (B) - Pre-Application and Neighborhood Meetings**

These meetings are not required of Type IV legislative applications.

#### Findings:

Although a pre-application meeting and neighborhood meetings are not required, as explained in Exhibit B - Community Engagement and Outreach Report, public meetings and other provisions for public involvement were held.

### **11.0602(C) - Application Initiation**

This section provides that the City Council may initiate a Type IV legislative application to amend the text of the Community Development Plan.

#### Findings:

As noted above, this project was initiated by City Council on June 20, 2021.

### **11.0602(D)(1) - Type IV Public Notice for Comprehensive Plan Amendments**

(a) For a Type IV Comprehensive Plan Amendment this section requires a submittal to the DLCD and Metro at least 35 days prior to the Planning Commission hearing.

(c) This section requires that at least 10 days before the initial hearing, a notice be published in a newspaper of general circulation in the city and copies of the hearing notice made available in City Hall.

Findings:

Submittal to DLCD and Metro was made on March 6, 2023, which is 35 days prior to the Planning Commission hearing date of April 10, 2023. Required notice of the public hearing for these proposed amendments was published in the Gresham Outlook on March 27, 2023 and made available through City Hall as required by this section.

**11.602(E) and 11.602(F) - Type IV Decision Authority and Type IV Notice of Decision**

This section requires that the Planning Commission hold a public hearing and make a recommendation to the Council for an amendment to the Community Development Plan. The Council considers that recommendation at their hearing and makes a final decision. Interested persons may present evidence and testimony relevant to the proposal at either or both hearings.

Findings:

The Council will make a decision that will be based on findings contained in this report and in the hearings record, and the decision, findings, and order will be sent to those who participated in the hearings.

**Section 11.1000 - Public Hearings**

This section provides for a hearing process consistent with Section 11.1000.

Findings:

Both the Planning Commission and the City Council, at public hearings in conformance with provisions of this section, will consider this proposal.

**Conclusion: The applicable standards in Sections 11.0200, 11.0600 and 11.1000 have been met, will be met before the issuance of a decision, or will be met with the issuance of a decision. Standards 11.0602(A) and (B) Pre-Application and Neighborhood Meetings are not applicable.**

**SECTION III - APPLICABLE COMMUNITY DEVELOPMENT PLAN (GCDP) GOALS & POLICIES (Volume 2)**

This section identifies the applicable Community Development Plan goals, policies, and action measures. The text (*italicized*) of the goals, policies, and action measures is followed by corresponding findings and conclusions.

Section 10.014 Land Use Policies and Regulations

Section 10.100 Citizen Involvement

Section 10.600 Housing

**Section 10.014 - Land Use Policies and Regulations**

*Goal: Maintain an up-to-date Comprehensive Plan and implementing regulations as the legislative foundation of Gresham's land use program.*

*Policy 2: The City's land use regulations, actions and related plans shall be consistent with and implement the Comprehensive Plan.*



- Policy 4: The City shall promote a development pattern of land uses in the amounts, types and of sufficient economic values to advance the community's quality of life and its social and fiscal stability.*
- Policy 20: The City shall periodically review and update the Comprehensive Plan text and the Community Development Plan Map(s) to ensure they remain current and responsive to community needs; provide reliable information and dependable, factually based policy direction, and conform to applicable state law, administrative rules, and regional requirements.*
- Policy 21: Council may, upon finding it is in the overall public interest, initiate legislative processes to change the Comprehensive Plan text and Community Development Plan Map(s) and Development Code.*
- Policy 23: Gresham shall coordinate the development, adoption and amendment of its land use related goals, policies and implementing measures with other affected jurisdictions, agencies and special districts.*
- Action Measure 11: Revise the Comprehensive Plan Text, Map and related findings as needed to maintain its reliability and timelines to ensure consistency among goals, policies, implementing measures; accuracy of findings and compliance with regional, state and federal laws and rules. This includes review by the Planning Commission every two years...*
- Action Measure 12: Monitor and evaluate whether City actions and resulting community conditions and circumstances are consistent with the goal and policy directions of the Comprehensive Plan and...*
- Action Measure 13: Monitor actions, programs and policies of federal, state and regional governments and when appropriate amend the Comprehensive Plan to be consistent with new laws and administrative rules.*
- Action Measure 15: Allow mixed-use commercial, employment and residential development to support transit use, enhance neighborhood economic and social vitality and provide for a range of housing opportunities/options.*

### Findings

City Council initiated this code revision as part of the City's response to the Oregon State Legislature's passage of House Bill 2003 (HB 2003) in 2019, which changed how Cities evaluate housing needs and support the production of housing types needed by current and future residents. The proposed amendments build upon the Comprehensive Plan revision that was adopted in 2021 (Gresham's Housing Capacity Analysis), which analyzed Gresham's future housing needs and evaluated the city's residential land capacity for that housing. The proposal is a continuation of that work and included more extensive public involvement (Exhibit B). It was

developed alongside Gresham's HPS; both documents are drafted to support the development of compact mixed use neighborhoods with access to transit, to advance fair housing, and to support the development of housing types affordable to Gresham residents.

The proposal updates the City's housing goals, policies, and action measures to coordinate with the current housing context, unmet housing needs, the 2021 Housing Capacity Analysis, the HPS, and Gresham's Strategic Plan. Therefore, the proposal was designed for conformance with State policies, updates to State laws, to facilitate implementation of the City's Land Use goals, and to respond to the need for a range of housing options.

Gresham's Community Development Plan has been found to be in compliance with state and regional requirements. The proposed amendments have been found to be in compliance with Gresham's Community Development Plan and State and regional requirements as described in this staff report.

As required by State and Metro regulations a draft of the proposed amendments were sent to the Oregon Department of Land Conservation and Development (DLCD) and to Metro at least 35 days prior to the scheduled April 10, 2023 Planning Commission hearing. As of the date of this report neither agency has contacted the City regarding this notice.

#### **Section 10.100 - Citizen Involvement**

*Goal: The City shall provide opportunities for citizens to participate in all phases of the planning process by coordinating citizen involvement functions; effectively communicating information; and facilitating opportunities for input.*

*Policy 1: The City shall ensure the opportunity for citizen participation and input when preparing and revising policies, plans and implementing regulations.*

*Policy 2: The City shall consider the interests of the entire community and the goals and policies of the Comprehensive Plan when making decisions.*

*Policy 5. The City shall keep citizens informed of issues confronting the City.*

*Policy 6: The City shall ensure that technical information necessary to make policy decisions is readily available.*

*Policy 7: The City shall facilitate involvement of citizens in the planning process, including data collection, plan preparation, adoption, implementation, evaluation, and revision.*

*Policy 8: The City shall ensure that citizen concerns are considered in land use decisions and shall provide feedback to the public regarding how these concerns have impacted decisions.*

*Policy 9: The City shall ensure that citizen involvement plans and activities incorporate Gresham's diverse constituencies regardless of age, sex, religion, social or business affiliation.*

*Policy 10: The City shall ensure the opportunity for the public to be involved in all phases of planning projects and issues.*

*Policy 11: The City shall ensure that the public has complete and timely access to all public information concerning land use projects and issues. This includes private proposals once they are in the formal application process.*

*Action Measure 2: Ensure that the input, information, factual contributions and expertise provided by citizens is considered...*

*Action Measure 4: Keep the public informed of opportunities for involvement in all phases of land use planning issues....*

*Action Measure 5. Provide citizens timely access to all public information related to land use matters....*

*Action Measure 7. Engage in outreach activities to inform and encourage public involvement...*

*Action Measure 8. Facilitate citizen input into the process for revising local land use plans and ordinances...*

*Action Measure 9: Make public participation processes user-friendly by...*

*Action Measure 10. Encourage broadly based public participation including all geographic area and diverse interests...*

*Action Measure 11. When appropriate, provide culturally sensitive participation opportunities, which may include language translation and interpretation.*

## Findings

The public involvement goals and policies establish the City's intent that its citizens have meaningful opportunities throughout a planning project to be informed and to affect proposals. The project included public meetings and outreach opportunities as outlined in Exhibit B (Citizen Involvement and Outreach Summary), which respond to Policies 1, 2, 5, 6, 7, 9, 10, and 11 and Action Measures 4, 5, 7, 8, 9, 10, 11.

Draft Planning Commission Minutes will be forwarded to City Council prior to the final Hearing for their consideration while making a decision in response to Action Measure 2. The recording of the PC hearing will also be available to Council and the public prior to the final hearing.

## **Section - 10.319 Central Rockwood Area**

*Housing Goal: Rockwood will be developed with new high quality housing and existing good quality housing will be rehabilitated when of benefit to Gresham.*

*Policy 1: Ensure that the Rockwood land use regulations and design standards provide for a variety of housing types for people of all income levels that supports a transit oriented mixed use neighborhood.*

*Policy 2: Allow for housing types that accommodate citizens with special needs, such as the elderly and those requiring care for disabilities.*

*Policy 3: Promote home ownership opportunities in Rockwood.*

*Policy 4: Encourage the rehabilitation or redevelopment of Rockwood's older housing stock whenever feasible.*

*Policy 5: Incent quality Rockwood housing development through all means practical.*

- Action measure 1:* Proactively work with developers proposing affordable housing, special needs housing, ownership opportunities and housing rehabilitation projects in Rockwood.
- Action Measure 2:* Develop a process that allows potential CDBG/HOME applicants to meet with City staff to discuss the City's housing goals and priorities.
- Action Measure 3:* Develop communication tools to inform potential CDBG/HOME applicants of the City's housing goals and priorities.
- Action Measure 4:* Proactively work with developers proposing all new residential projects and rehabilitation projects in Rockwood to ensure that quality in site design and construction is promoted. Develop an outreach program that will invite property owners and managers to discuss potential site and building upgrades with City staff.
- Action Measure 5:* Promote the development of moderately priced housing that can serve as a mechanism for citizens desiring transition from renting to home ownership.
- Action Measure 6:* Review all forms of potential incentives including the TOD program, fee adjustments, process adjustments and any other partnership opportunities that could provide additional impetus for Rockwood's housing developments.
- Action Measure 7:* Implement housing programs which require maintenance of existing and future residential developments.
- Action Measure 8:* Allow for the highest residential densities within the Rockwood Town Center district, Station Center, and adjacent to other existing light rail stations.
- Action Measure 9:* Permit and encourage moderate density residential development along bus transit corridors.
- Action Measure 10:* Preserve the integrity of existing, single family residential neighborhoods within the Central Rockwood area. Permit additional, small lot single family dwellings in these neighborhoods and allow for modest, gradual increases in density by allowing two unit attached dwellings. Commercial and mixed use developments will not be allowed.
- Action Measure 11:* Permit and encourage owner-occupied housing throughout Central Rockwood.

Findings:

Minimal updates are proposed to the Rockwood Housing Goal, Policies and Action measures; the purpose of the proposed amendments are:

- to coordinate with the draft amendments in proposed in other sections,
- to remove outdated action measures related to HOME/CDBG funding and the recent Middle Housing Code Update,
- and to clarify that rehabilitation and preservation of existing housing is supported where appropriate (for the quality of the building and the context).

The proposed amendments align with both the existing content of the Rockwood Housing Section and the City's and State's updated housing priorities (see Section I - Executive Summary, and Section III - Section 10.600, Findings for additional information on the City's and State's housing priorities).

### **Section - 10.600 Housing**

*Opportunities Goal: Gresham will have a full range of quality housing for its current and future residents.*

*Economic Development Goal: Housing investments will contribute to Gresham's economic development goals.*

*Rehabilitation/Revitalization Goal: Gresham's housing stock will be well maintained and will be rehabilitated when appropriate.*

*Livability Goal: Gresham will provide for a variety of livable neighborhoods.*

*City Role's Goal: The City will use appropriate tools, including public private partnerships, to achieve desired types and locations of housing.*

*Housing Opportunities Policies 1-3, Housing Opportunities Action Measures 1-3, Economic Development Policies 1-5, Economic Development Action Measures 1-5, Rehabilitation/Revitalization Policies 1-3, Rehabilitation/Revitalization Action Measures 1-4, City Roles Policies 1-4, and City Roles Action Measures 1-9 are included herein; therefore, all Housing Goals, Policies, and Action Measures are included in this subsection and subject to its findings and conclusion.*

### Findings

Section 10.600 Housing is proposed to be comprehensively updated as part of the project's comprehensive plan amendments. The proposed amendments are for the purpose of reflecting changes to the City's housing context and ensuring housing goals, policies, and action measures are consistent with the City's and the State's updated housing priorities, including those in the City's 2022-2025 Strategic Plan and Oregon's House Bill 2003 (HB 2003) The proposal consolidates the existing housing goals into one goal, which aligns with the City's Strategic Action Plan's Housing for All Priority. All existing policies have been revised to more closely reflect current needs. All existing action measures were evaluated and either removed because they were no longer needed (for example, the project was completed or the data shows City focus is not required) or were refined/incorporated into the newly proposed actions. Input from extensive public involvement was taken into consideration in the proposal (see Exhibit B).

The proposal is also consistent with Gresham’s draft Housing Production Strategy as required by Oregon as part of House Bill 2003 (HB 2003), adopted by the State Legislature in 2019. HB 2003 was adopted to help communities meet the diverse housing needs of Oregonians and requires cities to develop strategies to encourage production of needed housing.

**Conclusion: The proposed amendments to the Gresham Community Development Plan meet the applicable goals, policies and action measures in Section 10.014 Land Use Policies and Regulations, and Section 10.100 Citizen Involvement.**

**The goals, policies, and action measures in Sections 10.319 Central Rockwood Area and 10.600 Housing are proposed to be updated as part of this application. The proposal is consistent with the applicable Central Rockwood Area and Housing Goals, Policies, and Action Measures as outlined in the findings above.**

#### **SECTION IV APPLICABLE METRO URBAN GROWTH MANAGEMENT FUNCTIONAL PLAN TITLES**

<u>Title 1</u>	Housing Capacity
<u>Title 7</u>	Housing Choice
<u>Title 8</u>	Compliance Procedures

#### **Title 1 – Housing Capacity**

*Section 3.07.110 of this section states that “The Regional Framework Plan calls for a compact urban form and a “fair-share” approach to meeting regional housing needs. It is the purpose of Title 1 to accomplish these policies by requiring each city and county to maintain or increase its housing capacity except as provided in section 3.07.120.”*

#### **Findings**

The proposed Comprehensive Plan amendments do not change the zoned capacity of residential lands. The City of Gresham has a surplus of residentially zoned lands. The Buildable Lands Inventory in the Gresham Comprehensive Plan, Volume I, Section 4.800 identified sufficient capacity of residentially zoned lands to accommodate the projected housing need for the 2021-2041 planning period, with a surplus capacity for 6,380 units.

#### **Title 7 – Housing Choice**

*Title 7 of Metro’s Urban Growth Management Functional Plan is designed to ensure the production of affordable housing in the Metro UGB. Each city and county within the Metro region is encouraged to voluntarily adopt an affordable housing production goal and is required to ensure that their comprehensive plans and implementing ordinances include strategies to:*

- *Ensure the production of a diverse range of housing types;*
- *Maintain the existing supply of affordable housing, increase opportunities for new affordable housing dispersed throughout their boundaries; and*
- *Increase opportunities for households of all income levels to live in affordable housing (3.07.730).*

## Findings

The 2021-2041 HCA (adopted in Volume 1, Section 4.800 and Volume 2, Section 10.600 of the comprehensive plan in 2021) identified a need for a greater variety of housing types, and a need for housing affordable across all income levels, particularly for extremely low to middle income households. The proposed comprehensive plan amendments are consistent with and expand upon findings in the HCA. The currently proposed amendment includes goals, policies, and action measures that specifically address current unmet housing needs and combine to support equitable housing outcomes for all residents of Gresham, with an emphasis on improving outcomes for underserved communities, lower-income households, and people in state and federal-protected classes. The proposal includes policies and action measures to increase opportunities for new affordable housing and increase diverse housing options for households of all income levels.

### **Title 8 – Compliance Procedures**

*Section 3.07.820 of this title requires that at least 35 days prior to the first evidentiary hearing on an amendment to a comprehensive plan, or land use regulation, that the City submit the proposed amendments to Metro. Metro may review the amendments and can request that the City provide an analysis of compliance with the Functional Plan.*

## Findings

The City submitted the proposed amendments to Metro on March 6, 2023, which was 35 days prior to the first evidentiary hearing of April 10, 2023. Metro contact the City via email regarding this proposal on March 22, 2023 and stated that it had no comment. Metro’s contact is included in Exhibit C.

**Conclusion: The proposed amendments do not alter current housing capacity. The proposal is consistent with Title 1 Housing Capacity. The proposal is also consistent with Title 7 Housing Choice and Title 8 Compliance Procedures as described in the findings herein.**

## **SECTION V - APPLICABLE OREGON STATEWIDE PLANNING GOALS**

This section identifies the applicable Statewide Planning Goals. The text (*italicized*) of the goals, followed by corresponding findings and conclusions.

- Goal 1      Citizen Involvement
- Goal 2      Land Use Planning
- Goal 9      Economic Development
- Goal 10     Housing
- Goal 12     Transportation
- Goal 14     Urbanization

## **Goal 1 (Citizen Involvement)**

Statewide Planning Goal 1 for Citizen Involvement requires that cities “ensure the opportunity for citizens to be involved in all phases of the planning process.”

### Findings:

Gresham’s Planning Commission acts as the Committee for Citizen Involvement (CCI) and has been involved in the project through work sessions in July 2022 and February 2023. The HPS process followed up directly on the Housing Capacity Analysis and which was discussed by the Planning Commission in March and June 2021.

The project’s public process was provided through web updates, targeted stakeholder mailings, focus groups, advisory group meetings, activities at established community-wide events, and the published notices posted in the Gresham Outlook in advance of both the Planning Commission and City Council hearings. For a full summary of public outreach see Exhibit B Citizen Involvement and Outreach Summary.

Public comment may be submitted before or during the forthcoming Planning Commission hearing and City Council hearing. All those who submit comment on the proposed amendment receive a notice of decision. Additional findings regarding Citizen Involvement can be found in Section III, Section 10.100 of this report.

## **Goal 2 (Land Use)**

Statewide Planning Goal 2 for Land Use Planning requires cities to establish a land use planning process and policy framework as a basis for all decision and actions related to use of land and to assure an adequate factual base for such decisions and actions. This shall result in land use plans and implementation measures that are consistent with the land use plans.

### Findings:

The City has a state-acknowledged Comprehensive Plan. Section III of this report describes findings and conclusions that the proposed Comprehensive Plan Text Amendments are consistent with applicable procedures and applicable goals and policies of the City’s Comprehensive Plan.

## **Goal 9 (Economic Development)**

Statewide Planning Goal 9 for Land Use Planning requires cities to “provide adequate opportunities throughout the state for a variety of economic activities vital to the health, welfare and prosperity of Oregon’s citizens.”

### Findings:

The proposal is designed to help increase housing stability for Gresham’s residents, including residents who work within the city. Stable housing is vital to workforce staffing and retention; therefore, policies which support production and retention of housing that is affordable to a larger range of incomes will support Gresham’s workforce and increase business recruitment competitiveness. The policies in the proposal also foster residential and infrastructure construction, which part of the local economy. Proposed policies addressing barriers to such development support



that sector. Changes in the economy which were accelerated by the Covid-19 pandemic have led to less distinct boundaries between residential and commercial uses and policies which allow a wider variety of uses will support a broader range of business types including microbusinesses and home-based businesses.

Additional findings regarding Economic Development can be found in Section III, Section 10.414 of this report.

### **Goal 10 (Housing)**

Statewide Planning Goal 10 for Housing requires cities to “provide for the housing needs of citizens of the state”.

#### Findings:

The proposed comprehensive plan amendments are coordinated with Gresham’s Housing Production Strategy, which is being produced in compliance with statewide planning policies that govern planning for housing and residential development, including Goal 10 (Housing), OAR 660 Division 7 (Metropolitan Housing), and OAR 660 Division 8 (Interpretation of Goal 10 Housing).

These Comprehensive Plan updates are being proposed to reflect the findings of the City’s 2021 Housing Capacity Analysis and community values and priorities that were heard during the HPS project outreach. Proposed amendments to Volume 1 Findings include new and updated data regarding people experiencing homelessness and information on the risks of gentrification and displacement across the city. Proposed policies in Volume 2 support the production of housing for those that have not been adequately served by the market including protected classes and those experiencing homelessness.

Additional findings regarding Housing can be found in Section III, Section 10.600 of this report.

### **Goal 12. (Transportation)**

Statewide Planning Goal 12 aims to provide "a safe, convenient and economic transportation system." It asks for communities to address the needs of the "transportation disadvantaged."

#### Findings:

Proposed Volume 2 policies regarding housing equity and housing choice and location acknowledge the need for more housing in resource rich and transit accessible locations. Mixing uses can reduce the need for automobile-based transportation which reduces barriers for the transportation disadvantaged.

### **Goal 14 (Urbanization)**

Statewide Planning Goal 14 requires cities to provide for an orderly and efficient transition from rural to urban land use, to accommodate urban population and urban employment inside urban growth boundaries, to ensure efficient use of land, and to provide for livable communities. The goal requires cities to estimate future growth and needs for land and then plan and zone enough land to meet those needs.

Findings:

The proposed action measures in Volume 2 encourage more compact development which requires less infrastructure and land, reducing the pressure on urban growth boundaries.

**Conclusion: The proposed amendments comply with the applicable Statewide Planning Goals 1 Citizen Engagement, 2 Land Use, 9 Economic Development, 10 Housing, 12 Transportation, 13 Energy, and 14 Urbanization.**

**As of the date of this report DLCD has not contacted the City regarding the notice for these amendments.**

**SECTION VI - CONCLUSION**

The proposed Community Development Plan text amendments included as Exhibit 'A' Proposed Comprehensive Plan (GCDP) Text Amendments and its attachments are consistent with all applicable procedures, goals, and policies of the Community Development Plan, applicable Titles of the Metro Urban Growth Management Functional Plan, and applicable Statewide Planning Goals as indicated by findings contained or referenced in Section VI of this report.

**SECTION VII - RECOMMENDATION**

Staff recommends that the Planning Commission recommend adoption of the proposed Comprehensive Plan text amendments, CWP-23-00142, to the City Council based on the findings, conclusions, and recommendations in the March 31, 2023 staff report.

***End of Staff Report***