

Josette Griffiths  
Hood River County Planner  
RE: Odell Community Boundary  
February 14, 2014

Hello Josette,

Our comments fit best under the following question:

**What are your impressions of the Discussion Options in the Presentation?**

The Hood River Valley Residents Committee has taken a close look at the proposal, attended the initial meeting in December and driven the proposed boundaries. After reviewing OAR 660 division 22 and consulting with 1000 Friends of Oregon, we find it surprising that the Moderate (blue) and Large (purple) boundaries were proposed given that they do not meet the state's criteria for inclusion within an unincorporated community boundary. Even the Minimum Proposed Boundary (green) includes land that would not fit the criteria of the OAR. A more precise boundary drawn in accordance with the rules would look like a diagonal figure eight in the northwest section. The purpose of the unincorporated community OAR is to map what exists, not to create a pseudo-Urban Growth Boundary with a 25-year supply of urbanizable land to expand into. Under "Designation of Community Areas", counties are required to map based on strict criteria, not to insert extra lands for growth. From OAR 660-22-0020:

"(3) Only land meeting the following criteria may be included within an unincorporated community boundary:

(a) Land which has been acknowledged as a Goal 3 or 4 exception area and historically considered to be part of the community provided the land only includes existing, contiguous concentrations of:

(A) Commercial, industrial, or public uses; and/or

(B) Dwelling units and associated residential lots at a greater density than exception lands outside rural communities.

(b) Land planned and zoned for farm or forest use provided such land meets the criteria in section (4) of this rule.

(4) Community boundaries may include land that is designated for farm or forest use pursuant to Goals 3 and 4 if all the following criteria is met:

(a) The land is contiguous to Goal 3 or 4 exception lands included in the community boundary;

(b) The land was occupied on the date of this division (October 28, 1994) by one or more of the following uses considered to be part of the community: Church, cemetery, school, park, playground, community center, fire station, museum, golf course, or utility facility;

(c) Only the portion of the lot or parcel that is occupied by the use(s) in subsection (b) of this section is included within the boundary; and

(d) The land remains planned and zoned under Goals 3 or 4."

The packing-houses and the County have emphasized the need for work force housing and multi-family dwellings to accommodate employees that currently live outside the community. Making more land available for residential does not, on its own, lead to more work force housing. Indeed, the size of the boundary is not going to be the primary determinant of the availability of work force housing. Correlation is, in fact, very low. How can we make sure the boundary expansion yields low and moderate income housing and not \$500,000 second homes for out-of-towners? Appropriate zoning combined with economic incentives is needed to ensure our best intentions lead to the desired results.

But first, we need to better define the desired results. What is “work force” housing? The definition will have some implications for the effectiveness of various affordable housing tools. “Workforce” housing is usually defined as housing affordable to those making a certain percentage of Area Medium Income (AMI), such as those making 80% of AMI. What is the standard the county wants to use here? What is household size/make-up of those needing work force housing? Again, this will help define the need and the tools we use.

Once the need is better defined, the county has a variety of tools at its disposal. Zoning is one of the most powerful. Residential zoning should allow (and where appropriate require) a mix of housing types that meet the needs of the local work force. The best way to ensure affordable housing is to create a good supply of land zoned R-3 multi-family. This will also allow condominium development which would allow for fee ownership. R-2 zoned land would allow duplexes. Existing rural residential can be up-zoned to higher densities—say from ½ acre or 2 ½ acre RR to R1-7500. To consider changes in the county zoning ordinances to very narrowly allow "accessory dwelling units" (apartments above garages, for example) only within the UUC boundary is something to evaluate further as ADUs within at that area could be another potential way to provide affordable housing that does not change the character of an area. If the county provides subsidies, infrastructure, or other public investment to specific pieces of land in the boundary, it has legal leverage to require affordable housing units from private residential developers, if it wishes to do so. There are a host of other private/public partnerships and incentives that can be used to address the work force housing issue once the need and goals are more precisely defined.

One of the main purposes of our land use system is to protect resource lands. In drawing the three boundary options for the Odell UUC, the purple and blue boundaries stray too far away from what is really allowed by law and are unlikely to meet approval by the state. As previously stated in our comments, even the Minimum Proposed Boundary (green) includes land that would not fit the criteria of the OAR. The intention of an urban unincorporated boundary is to map what already exists, not to allow for future expansion to take care of Hood River's overflow.

We also think it would be helpful to decision makers and the public to have the following information when assessing boundary options:

- A detailed inventory of each boundary option by zoning and acreage (i.e. how much in M-1, M-2, C-1, EFU, RR-1/2 etc).
- The soil classifications of each of the EFU parcels under consideration for inclusion and whether the parcel is High Value EFU.
- Has anyone polled the 83% of the people who work in Odell but don't live there and whether they would move to Odell if there was housing available in their price range?

Thank you for the opportunity to comment on the proposals. We look forward to working with the county on this long and important decision.

Sincerely,

Polly Wood  
President  
Hood River Valley Residents Committee