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Attachments: [DLCD comment Grants Pass.docx](#)

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Please accept my comments for the Grants Pass Housing Strategy.

Grants Pass Housing Production Strategy.

To begin with, I think that this is a very cookie-cutter report by ECONorthwest. I've seen a lot of similar discussion and recommendations in reports for other cities. And their recommendations are very generic.

The first Strategy in the Exhibit 1. *Summary of HPS Strategies* (pg 10) shows exactly what is wrong with so many cities and their "housing strategies". Expanding the UGB when so much land is occupied by parking, low-density, single-story buildings and wide roads is exactly why there is a land shortage. It is not a land shortage but rather a shortage of efficient land use. What was level of investigation taken to determine the barriers to utilizing this land much less rezoning? What thought was given to how this would reduce redevelopment pressure on underutilized infill lots? What type of connections would result, and would that induce more driving?

It's not the city's fault entirely. In fact, I knew some of the staff that were very forward-thinking in land use. Many of the mistakes were made decades ago by city leaders who may not even be around anymore. However, I remember when the city tried to increase density in the core almost 20 years ago, a group of loud, obnoxious and unruly residents shouted over the meeting hosts because they did not want to "make Grants Pass like Portland". This ignores the fact that until the 1970's, Grants Pass was a city with a development pattern much like Portland's. There is also the anti-government, conservative county population that has elected County Commissioners who are opposed to traditional (i.e., pre-automobile) urban development.

Some responses to surveys demonstrate a lack of knowledge about financially resilient and community building development. In the Middle Housing Survey (2021): "City limits need to be expanded and more land opened to development" and "Older housing is being gentrified through flipping, rentals, and/or short-term rentals". In the Housing Needs Analysis and Code Update Stakeholder Interviews (2020): "Many interviewees noted environmental constraints, specifically slopes and wetlands, as the leading reason for a limited land supply".

Aside from allowing more types of housing that can be built anywhere in the city, one of the major limitations to building enough housing is the amount of parking required at residential AND commercial/industrial development. The Housing strategy mentions parking but only in how it is a "contentious issue". The missing element is the amount of parking allowed in multifamily and commercial/industrial development.

Associated with this parking issue is how buildings are located within a lot. Because each building has its own parking requirement and the developer/tenant wants each business to have the closest parking possible, buildings that could be placed adjacent to each other are separated by a large expanse of asphalt. Finally, instead of the

buildings being placed close to and facing the street they are set back a large distance from the street and sidewalk. All of these induce driving demand by making it easier to park and more hostile to walking and biking.

Associated too with parking is the design of streets and roads. The hierarchical classification system (arterials, collectors, residential) all create barriers to non-driving transport, putting pressure on staff to provide “adequate” parking and breaks up connectivity between neighborhoods. The state (and cities) needs to reframe the system to mixed-use/commercial and residential streets that focuses on the uses alongside the street rather than moving cars.

New development of any kind needs to be built facing the street. For too long, new housing developments construct the row of houses along the main street so that the backs of the properties face the street rather than the front of the houses. This, along with a long fence or wall line, breaks up neighbor connectivity, creates an inhospitable walking/biking environment, encourages higher speeds and induces driving, which leads to more pressure to provide “adequate” parking leading to less space for housing.

Finally, large three-story apartment buildings surrounded by parking must be banned. They are either built on the edge of town, inducing driving demand, or overwhelm an existing neighborhood, creating a backlash, while not integrating with the neighborhood.