



July 11, 2019

Jim Rue, Director
Oregon Department of Land Conservation and Development
635 Capitol Street NE, Suite 150 | Salem, OR 97301-2540
jim.rue@state.or.us

Dear Director Rue,

Please provide this written exception to the Land Conservation and Development Commission ("Commission") and enter it into the public hearing record for the item, Review of Metro Urban Growth Boundary Adjustment, scheduled for Friday, July 26, 2019. As an affected local government, the City of Wilsonville ("City") appreciates the ability to review the Director's report ("Report") submitted to the Commission on July 1, 2019, and provide additional written testimony for the Commission's consideration.

The City reviewed the Report and agrees with the Oregon Department of Land Conservation and Development (DLCD) Director's analysis of objections and the recommendation to the Commission, and the City requests the Commission approve Metro's submittal of a 2,100 acre urban growth boundary expansion for needed housing (Metro Ordinance No. 18-1427).

In reviewing the objections, it is clear that most of the objections are not applicable to Wilsonville. The City concurs with the Director's recommendation to reject the objections based on the grounds that the Metro Council's decision was made on sufficient information in the record, based on the appropriate decision criteria at this stage in the land use planning process.

As a local jurisdiction in the Portland metro region, the City coordinates comprehensive planning updates with Metro and DLCD staff to ensure compliance with all Metro and State land use requirements, including the Metropolitan Housing Rule (MHR) requirements. During the City's most recent Housing Needs Analysis (HNA), as part of Periodic Review, DLCD reviewed and approved the submittal (Order 001856, dated July 10, 2014), reflecting the City's compliance with Goal 10 and applicable administrative rules.

The same coordinated land use planning process applies to planning UGB expansion areas. The concept plan and master plan the City adopted for the Frog Pond West Area were based on the recognized HNA and completed in compliance with Metro's Urban Growth Management Functional Plan, including Title 11. Coordination and compliance review was conducted with Metro and DLCD at the time of plan adoption. As the City did with Frog Pond West, local

governments must demonstrate compliance with Metro and State land use requirements to these two regulating bodies at time of periodic review and post-acknowledgment plan amendments, rather than at time of UGB expansion. This same land use process will apply to the expansion areas included in Metro Ordinance No. 18-1427. Metro's Conditions of Approval to the Ordinance will further enforce compliance with these standards at time of the City's comprehensive planning. Both Metro and DLCD will have the ability to monitor and enforce compliance with the Conditions and relevant regulations, including the State MHR.

While the process for compliance is important, it is also important to note that City policy is already in compliance with the cited regional and state housing policies. This is particularly important if the Commission considers remand of a portion of Metro's submittal.

Metro's most recent annual Compliance Report outlined Wilsonville's compliance with the different Titles of the Urban Growth Management Functional Plan, including Title 7 and Title 11, for all areas except Basalt Creek, which was adopted earlier this year with compliance acknowledgment by Metro.

Oregon's Metropolitan Housing Rule (OAR 660-007) requires Wilsonville to "provide the opportunity for at least 50% of new residential units to be attached single-family housing or multiple family housing" and to "provide for an overall density of 8 or more dwelling units per net buildable acre." As stated earlier, DLCD reviewed and approved the City's periodic review submittal related to housing (Order 001856, dated July 10, 2014). The City not only allows the opportunity for these conditions in its policies, but the City's total housing supply consists of 52% multifamily units and 48% single-family attached and detached homes. In 2017, the average residential density of the permitted dwelling units in Wilsonville was 15 units per acre. The City has a long history of proactively planning for a variety of housing types to meet different needs – within a household's lifecycle and for various demographics/households – which has resulted in the City's diverse housing stock.

The City's diverse housing stock is also an important contributing factor as to why Wilsonville is among the few cities in the Portland region that is below the cost-burdened household threshold set by the State. The City has a long history of taking action to implement various best practices for maintaining an affordable housing supply in Wilsonville, including, but not limited to:

- Providing a significant amount of regulated affordable housing, including mental health housing, to which the City provides a tax exemption;
- Undertaking an equitable housing strategic plan with a commitment to adopt six action items;
- Adopting accessory dwelling unit ("ADU") best practices including a system development charges waiver adopted administratively in 2009 and codified in City Code this year;
- Adopting a mobile home park closure ordinance to minimize adverse impacts to residents of closing mobile home parks; and
- Accommodating a high percentage of multifamily housing units.

This principle of proactively planning for a variety of housing types to meet different needs, continues to guide planning efforts in the City, including the Wilsonville expansion area proposal. As reflected in the City's application (Record at 2873), the adopted concept plan for the area calls for the provision of a diversity of housing types: single-family detached, duplexes, townhomes, cottage clusters, co-housing, and the potential for multi-family units above the neighborhood commercial uses (with an average density of 10 dwelling units per net acre). The various sub-districts within the expansion area, as identified by the plan, require specific densities to be built, which support the various housing types, with the highest residential densities located closest to transportation infrastructure, retail uses, school facilities, and community open space. Located at the edge of the city, where urban reserves meet rural reserves, the area is well-suited to provide more "missing middle" housing choices. In addition to this variety of housing types in the area, more multi-family opportunities will be constructed as the recently-adopted Wilsonville Town Center Plan is implemented.

The concept plan for the expansion area outlines policy directives that will enable the City to continue to provide a variety of housing choices and densities to meet the varying needs in the community, as outlined in the state-acknowledged HNA. With acknowledgement of Metro Ordinance No. 18-1427 for a 2,100 acre urban growth boundary expansion for needed housing, the City can begin implementing the plan's policy directives through comprehensive plan amendments, which will be undertaken in partnership with Metro and DLCD. This local plan amendment process will enable the City to provide those housing choices and densities that support the City's goals, 2040 Growth Concept, and State MHR.

Please accept this letter on behalf of the City of Wilsonville in support of the Director's recommendation to the Commission. The City respectfully requests the Commission approve Metro Ordinance No. 18-1427 as-a-whole, or at a minimum for Wilsonville's expansion area, given the City's existing compliance (as shown in the Record) with all relevant regulations outlined in the objections.

Sincerely,



Miranda Bateschell
Planning Director

c:

Mayor Tim Knapp, City of Wilsonville
Bryan Cosgrove, City Manager, City of Wilsonville
Chris Neamtzu, Community Development Director, City of Wilsonville
Esther Kooistra, DLCD
Kirstin Greene, DLCD
Gordon Howard, DLCD
Jennifer Donnelly, DLCD