



August 10, 2023

Dept. of Land Conservation and Development  
Housing Division  
635 Capitol Street NE, Suite 150  
Salem, OR 97301

**Re: City of Gresham Housing Production Strategy (HPS)**

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

HLA and FHCO commend the staff of the City of Gresham for their diligent work in analyzing the housing needs for current and future residents. We are largely supportive of the strategies identified in the HPS, particularly measures which aim to expand homeownership opportunities for low-income residents. However, the City's own accounting shows that these strategies do not go far enough.

As identified in the Executive Summary, the City is projected to grow by 6,229 new households from 2021-2042, of which 3,037 (approximately 49%) are expected to be Extremely Low-Income (less than 50% of the MFI). This is in addition to the 19,523 current households which fall into this income bracket. In spite of this, only one of the four housing outcomes ("Encourage Production of Publicly Subsidized Affordable Housing Units") explicitly impact households with incomes under 60% MFI. The collected data further suggests that BIPOC residents and people with disabilities are disproportionately likely to be rent burdened, so addressing these needs is a critical element of meeting the fair and equitable outcome requirement.

We would also like to highlight the fact that while the plan contained strong analysis of the need for racial equity and accessibility, specific strategies to address these issues were left to the "Recommendations for Future Actions" section. As cited by the document, "(n)early two thirds (63%) of Gresham households live in Census tracts that combine a high gentrification risk and a high socioeconomic vulnerability level." This would suggest a strong need for fair housing measures, such as adopting an Affirmatively Furthering Fair Housing policy, in order to ensure that needed housing investment does not have the result of causing involuntary economic displacement. The HPS also does not commit to specific policies which would expand the



accessible housing supply “for 14,579 people with one or more disabilities, accounting for 13% of people in Gresham.”

HLA and FHCO urge DLCD to require the City to revise the HPS and further commit to strategies which meet the needs of those who face the highest barriers to fair and affordable housing. Please provide written notice of your decision to, FHCO, c/o Allan Lazo, 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. Please feel free to email Allan Lazo at [information@fhco.org](mailto:information@fhco.org) or reach him by phone at (503) 223-8197 ext. 104.

Thank you for your consideration.

A handwritten signature in black ink that reads "Allan Lazo".

Allan Lazo  
Executive Director  
Fair Housing Council of Oregon

A handwritten signature in black ink that reads "Samuel Goldberg".

Samuel Goldberg  
Board Member  
Housing Land Advocates