



October 26, 2020

City of Ashland Planning Commission  
51 Winburn Way  
Ashland, OR 97520

**Re: The proposed amendments to the Land Use Ordinance relate specifically to units covered under the Ashland Affordable Housing Program which are required to be affordable due to a land use approval including annexations, zone changes, density bonuses for affordable housing, and conversion of apartments into condominiums. (PA-L-2020-00009)**

Dear Commissioners:

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.

As you know, all amendments to the City's Comprehensive Plan and Zoning map must comply with the Statewide Planning Goals. ORS 197.175(2)(a). When a decision is made affecting the residential land supply, the City must refer to its Housing Needs Analysis (HNA) and Buildable Land Inventory (BLI) in order to show that an adequate number of needed housing units (both housing type and affordability level) will be supported by the residential land supply after enactment of the proposed change. Further, adequate Goal 10 findings are also required for housing related code amendments, including development code changes such as parking standards that have an impact on development type and feasibility. We have reviewed the Planning Commission packet and observed no written findings for PA-L-2020-00009, and support the large impact it will have on the ability of the City to meet its housing needs. However, we are obligated to submit a comment letter raising concerns about the failure to analyze Goal 10 in a manner that allows us to provide useful comments.



Thank you for your consideration. Please provide written notice of your decision to, FHCO, c/o Louise Dix, 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 Louise Dix at [ldix@fhco.org](mailto:ldix@fhco.org) or reach her by phone at (541) 951-0667.

Thank you for your consideration.

*Louise Dix*

/s/ Jennifer Bragar

Louise Dix  
AFFH Specialist  
Fair Housing Council of Oregon

Jennifer Bragar  
Housing Land Advocates

cc: Kevin Young ([kevin.young@state.or.us](mailto:kevin.young@state.or.us))