



# Oregon

Kate Brown, Governor

## Department of Land Conservation and Development

Community Services Division  
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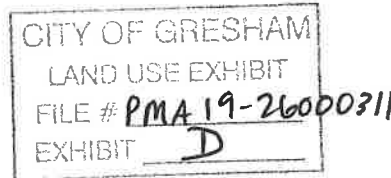
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25 September 2019



Ken Onyima, Senior Planner  
City of Gresham  
1333 NW Eastman Parkway  
Gresham, OR 97030

SENT VIA EMAIL



**Re: Proposed Plan Amendment (Local File PMA 19-26000311; DLCD File 004-19)  
Zone Change from General Industrial to Corridor Mixed Use**

Dear Ken:

Thank you for discussing this application with me via email. The department has reviewed the application for the 8.26 acre rezone from General Industrial to Corridor Mixed Use, we have the following comments. The application analysis clearly supports the conversion of this property to corridor mixed use which allows residential use. In addition the applicant states that this rezone will help meet the need for more residential land that will help to meet the "Missing Middle" housing issue in the City of Gresham, finding;

- The City has an unmet demand for additional housing capacity, specifically missing middle
- The site is not suitable for industrial development due to locational characteristics, most significantly access and slope
- The proposed zone change would not be expected to have a negative impact on economic development efforts
- The entitlement change would be expected to bring the property into active urban use, and be supportive of the City's adopted goals and policies

However, the issue under Oregon Administrative Rule (OAR) that needs to be addressed is not the need for residential land but the supply of industrial land in the City of Gresham. It is not clear in the analysis provided in the application that Gresham's 20-year supply of employment land will not be negatively affected by this proposed application were the 8 + acres of industrial land converted to mixed use. Accordingly, the department needs to have findings for OAR 660-009—010(4):

*For a post-acknowledgement plan amendment under OAR chapter 660, division 18, that changes the plan designation of land in excess of two acres within an existing urban growth boundary from an industrial use designation to a non-industrial use designation, or another employment use designation to any other use designation, a city or county must address all applicable planning requirements, and:*

- (a) Demonstrate that the proposed amendment is consistent with its most recent economic opportunities analysis and the parts of its acknowledged comprehensive plan which address the requirements of this division; or*

*(b) Amend its comprehensive plan to incorporate the proposed amendment, consistent with the requirements of this division; or*

*(c) Adopt a combination of the above, consistent with the requirements of this division.*

As proposed, this proposal is not consistent with goal 9: Economic Development as we do not find any conclusions regarding sufficiency of remaining 20-year supply of employment land.

A portion of this property is designated as Title 4 land, it is not clear that this proposed application meets Metro's Title 4: 3.07.420 Protection of Regionally Significant Industrial Areas (RSIA). The proposed area is partially within the RSIA area. We would like to see findings addressing Metro's Title 4.

Please contact me with any questions you may have. Please submit this letter into the official record.

Respectfully,

Jennifer Donnelly  
Regional Representative

cc via e-mail:

Gordon Howard, DLCD  
Kirstin Greene, DLCD  
Alan Gunn, Metro  
Tim O'Brien, Metro