



August 10, 2021

filed via email: swoodford@ci.sisters.or.us

City of Sisters Planning Commission
c/o: Scott Woodford, Community Development Director
520 E. Cascade Avenue
Sisters, OR 97759

Re: 2040 Comprehensive Plan Update

Dear Chair Seymour, Vice-Chair Converse, and Planning Commissioners:

Central Oregon LandWatch (“LandWatch”) provides these comments on the draft 2040 Comprehensive Plan Update (the “Update”) included in the agenda packet for this August 12, 2021 hearing. LandWatch is a land use advocacy organization with a 35-year history of defending and planning for Central Oregon’s livable future, including through participation in several comprehensive planning and urban growth boundary amendment processes.

In general, LandWatch supports the Update and its many policies. The Update is organized around Oregon’s 19 statewide land use planning goals, which provide a framework for efficient and sustainable growth. The Update’s policies are tailored to the unique qualities of the City of Sisters that make Sisters a special place: its small village feel, interface with natural areas, walkable transportation network, and promotion of an artisan economy. We applaud the hard work of City staff, consultants, the Community Advisory Committee, Stakeholder Advisory Committee, and community members that informed and developed the Update.

We note several specific policies in the Update that will ensure Sisters continues to be a wonderful place to live and work as the City grows:

- Objective 1.1 – 1.3: Throughout the policies under this objective, the Update inserts “community” involvement in place of “citizen” involvement. This change will help the City to engage all voices in planning efforts, leading to more inclusive and representative planning and policy.
- Objective 3.1 is “[t]o promote efficient development within the Urban Growth Boundary (UGB) to accommodate forecasted housing and employment growth, minimize the cost of providing public services and infrastructure, and to protect resource land outside the UGB. This shall be balanced with community goals and policies to manage natural resources, preserve open space, and maintain community livability.” LandWatch supports



this objective for its well-balanced approach to growth management. The best way to accommodate housing and employment growth, minimize infrastructure costs, and protect surrounding resource land is to plan for efficient, compact, and walkable urban form inside the UGB.

- Policy 3.1.2: This policy states that “the City shall promote efficient development within the existing UGB and explore the potential for establishing and implementing urban reserves to guide longer-term development.” In addition to efficient development within the UGB, LandWatch supports establishing urban reserves outside the UGB to provide long-term certainty about future land needs. We look forward to participating in any future urban reserves discussion.
- Policies 3.2.1, 3.2.2, 3.2.4, and 3.3.2: These policies call for concurrency, or the establishment of capital improvements, urban infrastructure, and services like transportation, sewer, water, police, and fire, before or concurrent with the urbanization of land. Such policies are important for ensuring that growth and its costs are well-coordinated.
- Policies 4.2.3 and 4.2.5: These policies call for development of well-connected neighborhoods with convenient access to goods and services and a variety of housing types suitable for different income levels, ages, and lifestyles. LandWatch is highly supportive of this vision for complete communities accessible to all Sisters residents.
- Objective 3.4 Active Transportation: This objective and its policies promote the provision of active transportation which will help keep Sisters a walkable, safe, and convenient place to get around.
- Goal 5 Housing: We particularly support the goal to create “opportunities for development of a wide range of housing for all ages and income levels” and several of the objectives and policies that support that goal:
 - Policy 5.2.1: Flexibility for innovative housing types to meet evolving housing needs.
 - Policy 5.2.2: Accommodate housing needs of people in all life stages in locations within walking distance to commercial areas and other services.
 - Policy 5.2.4: Encourage mixed use development.
 - Objective 5.3: Support development of low- and moderate-income housing, transitional housing, and emergency shelters.

Overall, these Goals, Objectives, and Policies call for the type of housing most needed in Sisters: housing affordable to people of all incomes and that meets the needs of all people. They also call for mixed use development and complete communities that connect people to jobs and services. LandWatch supports this vision for a wide diversity of housing types and sizes.

- Goal 6.1. We appreciate Policies 6.1.2 and 6.1.3 which support the preservation of trees and as the City grows.
- Objective 6.2.1: This Objective and its policies require the City to prepare for and mitigate against the risk of wildfire. We especially support Policy 6.2.1.5 which calls on the City to evaluate wildfire risk as a criterion for future areas of growth. Wildfire is a regular and natural process in the City’s dry forest landscape, and land use planning alongside fire-resistant building codes are the best way to protect people from the risks of wildfire.



- Policies 8.1. and 8.3: These policies call for pedestrian scale development and mixed use development in the City's commercial zones.

While we are overall supportive of this comprehensive plan update, we question one policy relating to the City's housing needs. Policy 5.1.1 states that "[t]he City shall ensure adequate, developable residential land is available to meet the City's needs as identified in the most recent adopted Housing Needs Analysis." In principle, this policy is consistent with statewide land use planning Goal 10 related to Housing. However, and as LandWatch previously commented to the Stakeholder Advisory Committee, the most recent update to the City's HNA does not accurately reflect the City's greatest housing needs. The HNA uses past trends in housing development, which are slanted towards large lot, single family detached housing, to forecast future housing needs. We encourage the City to not let those past trends dictate the future. Instead, the HNA should call for more smaller, affordable, and multiunit housing types. Please see LandWatch's May 12, 2021 comments on the 2040 Comprehensive Plan Update Urban Growth Boundary Sufficiency Report, attached here as Exhibit A.

We encourage the City to be guided by the policies in this draft Update, which calls for efficient development and smaller, more affordable housing types, in any future discussions of UGB capacity. **To further the City's housing, urbanization, transportation, and environmental goals, we suggest the addition of a policy under Objective 5.1 that states "The city will strive to accommodate all forecast growth inside the existing UGB in order to protect surrounding resource lands and open space, minimize greenhouse gas emissions, increase walkability, and provide more affordable housing types."**

Thank you for the opportunity to comment on the Update, and please inform us of any future decisions or opportunities to comment.

Regards,



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May 12, 2021

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Sisters 2040 Stakeholder Advisory Committee
Sisters 2040 Community Advisory Committee
c/o: Scott Woodford, Community Development Director
520 E. Cascade Avenue
Sisters, OR 97759

Re: 2040 Comprehensive Plan Update Urban Growth Boundary Sufficiency Report

Dear Stakeholder Advisory Committee and Community Advisory Committee members:

Central Oregon LandWatch (“LandWatch”) provides these comments on the 2040 Comprehensive Plan Update Urban Growth Boundary Sufficiency Report (the “Report”) dated April 12, 2021. LandWatch is a land use advocacy organization with a 35-year history of defending and planning for Central Oregon’s livable future, including through participation in several comprehensive planning and urban growth boundary amendment processes.

We are concerned that the Report puts the cart before the horse by prematurely asserting that up to 100 acres of additional residential land are needed to accommodate forecasted future growth before consideration of any measures to increase the housing capacity inside the current Urban Growth Boundary (UGB). Oregon law requires that before determining additional land is needed to accommodate housing over the 20-year forecast period, a city must first consider urban efficiency measures to determine whether forecast growth can be accommodated within the existing UGB. 660-024-0050(4). (“Prior to expanding the UGB, a local government must demonstrate that the estimated needs cannot reasonably be accommodated on land already inside the UGB.”)

The Report recognizes efficiency measures must be considered before adding land to a UGB, Report at 2, 18-19, but nevertheless continues to conclude that up to 100 acres of new residential lands are needed. Such a conclusion cannot be legally or factually reached prior to demonstrating how much forecast growth can reasonably be accommodated on land already inside the UGB through the use of efficiency measures.



Publicly stating that the City will need up to 100 acres of new residential lands is inappropriate at this time. Such a conclusion should only be quantified after the City follows the detailed process mandated by state law, found in ORS 197.296, Goal 14, and OAR Chapter 660, Division 24.

It appears that the primary reason that the Report concludes that the City will need up to 100 acres of new residential land is an unsupported assumption that larger single-family detached lots are needed by the City. In fact, the City's recent Housing Needs Analysis (HNA), and the March 30, 2021 update memo, find that the current UGB has capacity for 996 new housing units, and that over the 20-year planning period the City will need to accommodate 1100 new housing units. **This means that all but 104 new housing units can be accommodated in the existing UGB and without any new efficiency measures.** There is high likelihood that with the adoption of new efficiency measures, all 1100 new housing units can be reasonably accommodated inside the existing UGB. Even if a UGB expansion is found to be necessary to accommodate those 104 new housing units, 100 acres would mean an extremely low density of about 1 unit per acre. On this record, the conclusion that up to 100 acres of new residential land are needed is completely unsupported.

Perhaps the Report's conclusion that up to 100 new acres are needed is because the City's historical housing mix – the ratio of single family detached, single family attached, and multifamily units – has skewed towards single family detached. The HNA gives this explanation for its presumption that significantly more single family detached housing will be needed in the future:

“Since 2000, detached single family units (including manufactured and mobile homes) have constituted most of the permitted units in Sisters. In keeping with development trends, and the buildable land available to Sisters, single family units are expected to make up the greatest share of new housing development over the next 20 years.” (2019 HNA at 24)

This historical housing mix need not necessarily continue into the future, as the City may decide to provide more multifamily and single family attached units than it has historically, either by rezoning some lands inside the current UGB or by otherwise incentivizing development of the existing vacant lands zoned for multifamily housing. In fact, the HNA repeatedly finds that the greatest housing need is for smaller housing types that are more affordable to the people that live and work in Sisters. To meet this need, the City should proactively provide fewer expensive



single family detached housing types, and more affordable multifamily and middle housing types, than it has historically. This is exactly the type of policy discussion the City should have in evaluating new efficiency measures before jumping to conclusions about new residential land needs.

The Report also finds that the City has a 24 acre surplus of employment lands not needed to accommodate forecast employment uses over the 20-year planning period. Report at 13. It would be entirely reasonable for some of these lands to be rezoned to accommodate housing needs.

Not only is it premature and inappropriate to conclude that up to 100 acres of new residential land are needed, but it also appears to be counter to community preferences. The City on May 3, 2021 released its “2040 Comprehensive Plan Update Key Themes Summary: Community Conversations” which reports on key themes heard from dozens of community groups. Resoundingly, community groups called for minimizing sprawl, promoting a mixed-use village atmosphere, and providing more affordable housing types: “compact city footprint and ability to walk or bike throughout town,” “promote compact development,” “be inclusive to newcomers,” “deep concern about the lack of affordable housing to support the local workforce,” “desire for a diverse housing stock (apartments, townhomes, single-family, mixed-use buildings),” “support infill development in existing neighborhoods [and] reduce the construction of large homes on small lots,” “promote additional mix of housing types,” “diverse housing options for families, working-class, retired,” “promote cottage housing, mixed-use development and a cohesive ‘village feel’,” “reduce the number of second homes and vacation rentals that are vacant for a large part of the year.” 2040 Comprehensive Plan Update Key Themes Summary: Community Conversations at pages 2-3.

The assumptions and conclusions of the UGB Sufficiency Report about residential land needs are at odds with both the data, which shows that 90% of all new housing units can be accommodated in the current UGB, and the preferences of the community.

Thank you for your work so far in updating the City’s Comprehensive Plan and for considering these comments. LandWatch looks forward to working with the City to develop efficiency measures that help the City provide the housing types most needed by Sisters residents.

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Regards,



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