

Kevin
Dexter

Susan Garrett Crowley
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August 20, 2018

TO: Hood River City Planning Commission

FR: Susan Crowley

RE: Comments on the Land Use Frameworks proposed in the Dec. 29, 2017
Westside Area Concept Plan (WACP) Report.

THE WACP CITIZENS' GROUP DISSENTING STATEMENT

The WACP Report notes at pages 43-4 that the citizens' Project Advisory Committee (PAC) was not unanimous in concurring on the need for up-zoning. The dissenting group of PAC members issued a Dissenting Statement outlining its reasoning and conclusions, which it requested be included in the final Report. It has been provided to you as an attachment for your information.

THE ISSUE OF FALSE URGENCY

There is an unspoken assumption that the city is somehow "required" to facilitate the dense building of new housing for anyone who wants to live in Hood River, and that it must up-zone to make lots smaller and the city more crowded. This is not the case.

It is for the citizens of Hood River – and them alone -- to decide how growing population pressures will affect the livability and quality of life in their city. The truth is that neither state nor local law require the city to do anything more if it does not so choose. This is a matter of local public policy for its citizens to decide.

The September 2015 Hood River *Housing Needs Analysis*, which is now Goal 10 of our city Comprehensive Plan, concluded that the city has "enough" buildable land within its UGB to accommodate needed housing until 2035 at all price points, including that of lower-income residents. Provision of enough buildable land within the UGB is all that Hood River is legally required to do.

Please see the attached excerpt from a memo explaining the implications of the *Housing Needs Analysis* study by EcoNorthwest, the consultancy which authored it. The *Housing Needs Analysis* accommodates projected need for multi-family housing by assuming that this housing will also be accommodated in C-2 zones.

The "enough" conclusion of the Housing Needs Analysis that just enough land exists means that under state law it is not required to do any up-zoning at all. This is particularly the case since, at the time of the Housing Needs Analysis, cities of less than 25,000 population were not required to take any action at all even if a shortage of land for needed housing were found. ORS 197.296(1)(a).

It is a principle of good land use planning that up-zoning not disrupt the expectations of existing neighborhoods. The WAC Plan suggestions violate this principle. A 2016 map (provided in early WACP documents) of the existing zoning is attached. You can see from comparing this map with the *Report's* suggested up-zoning changes that many current single-family neighborhoods in the WACP area could be affected by significant density increases.

Applying these suggestions to the entire city (an issue never studied by the WACP and outside its scope of work) could have devastating impacts on historic older neighborhoods left vulnerable to "scraping" by developers to create bare lots to build densely-packed townhouses.

The gist of the WAC Plan recommendations, even in three slightly modified versions to provide faux "choices," is that nearly the entire Westside is subject to an indiscriminating blanket up-zoning, including developed and long-existing neighborhoods. There are two exceptions: a strip of existing R-1 would remain along the western UGB boundary, and a strip of existing R-2 would remain along the southern UGB boundary.

Otherwise, everything is blanket up-zoned, much of it to an intensified R-2A level more dense than the standard R-2 zone, and there is spot zoning of R-3 inserted into or beside existing R-1 neighborhoods in violation of neighbors' purchase expectations.

The WAC recommendations are too much, too soon, and too heedless of the existing facts on the ground. The above concerns do not even reflect that since the *Housing Needs Analysis* was done, the state's officially projected population growth for the city dropped from a projected 2% to 1.4%.

No premature up-zoning should be considered until other actions recommended by the Housing Needs Analysis to facilitate multi-family construction in C-2 zones have been actually pursued. The base zoning should be maintained at least until these actions are completed and formally evaluated for their impact.

Thank you for your time and attention to an issue that will affect the face of our town for many years to come.

DATE: September 14, 2015
TO: Hood River City Council
CC: Cindy Walbridge
FROM: Beth Goodman
SUBJECT: FINAL: HOOD RIVER HOUSING STRATEGY

The City of Hood River is developing a housing needs analysis (HNA), which requires conducting an assessment that is consistent with Goal 10. The results of the HNA show that Hood River has enough land to accommodate expected growth within the urban growth boundary (UGB). However, the HNA shows that Hood River has very little land more than the city needs to accommodate growth over the next 20 years. If the City grows faster than expected or if development of secondary housing or short-term rentals grows substantially, the City will exhaust its supply of buildable residential land. In addition, the City's supply of Urban High Density Residential land (R-3 land) is extremely limited. The HNA assumes that some multifamily housing will develop, as part of mixed-use buildings, in the General Commercial (C-2) zone.

For a variety of reasons, expanding Hood River's UGB will be very difficult. In short, Hood River is surrounded by the Columbia River Gorge National Scenic Area and by farmland. Expanding the City's UGB in these areas will be extremely difficult. As a result, the City should manage the land within the UGB to increase housing development capacity as much as possible, while maintaining the character and quality of life in Hood River.

This memorandum presents a Housing Strategy for Hood River, based on the results of the HNA, discussions with the Technical Advisory Committee (TAC), input from the Hood River Planning Commission, and direction from the Hood River City Council. The housing strategy presents comprehensive package of interrelated policy changes that the TAC and Planning Commission recommend the City address over the next one to three years.

Beginning in Fall 2015, City staff expects to begin working with the Planning Commission to implement changes to the land use code based on the final Housing Strategy, which will incorporate changes from the Planning Commission and City Council. Staff will also work with the City Council to make legislative policy changes described in this Strategy, starting on high-priority changes in Fall 2015.

The Housing Strategy also includes information about other potential policy changes that the TAC did not identify as being the highest priority changes for the next few years. Appendix B provides information about additional types of policy changes that may be appropriate for Hood River, including additional opportunities to streamline or revise Hood River's zoning code. The City may want to revisit the recommendations for policy changes in three to five years, to identify whether additional policy changes are needed.



**Existing Land Use
(Based on County Assessor Data)**

- Study
- Hood River UGB
- Hood River City Limits
- Rail Line
- Vacant
- Park / Open Space
- Forest
- Residential - Single Family
- Residential - Multifamily
- Manufactured Structure Park
- Agricultural/Tract
- Commercial Use
- Industrial Use
- School
- State Owned
- City / County / Port Owned
- Church / Fraternal



Date: 9/23/2016
 Prepared By: Angelo Planning Group
 DRAFT

COLUMBIA RIVER
 HOOD RIVER
 WASHINGTON
 OREGON
 CLATSOP COUNTY
 HOOD RIVER CITY

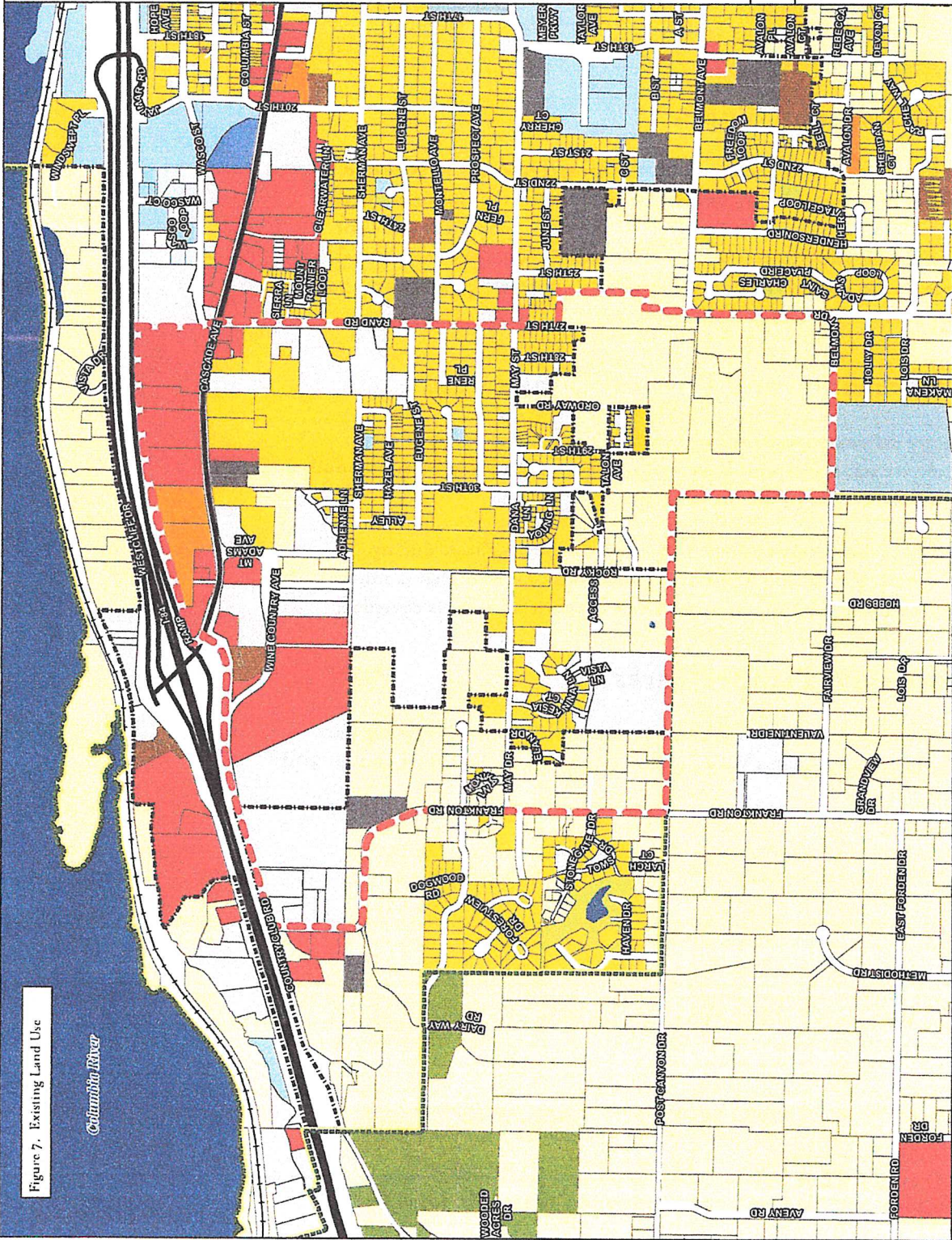


Figure 7. Existing Land Use

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TO: City of Hood River Planning Commission

RE: File No. 2018-07: Westside Area Concept Plan Report, Zoning, and Comprehensive Plan Amendments

I was a member of the Westside Area Concept Plan (WACP) Project Advisory Committee. The PAC a group of interested citizens and stakeholders which was formed to give feedback to the consultants who prepared the WACP final report. The PAC varied in its composition and the commitment of its members, but at its final meeting about a dozen people participated in the discussion and recommendations.

Several of us on the PAC determined that we could not support many of the assumptions and conclusions of the final WACP report and issued a brief Dissenting Statement to that effect. The Dissenting Statement was addressed not only to the consultants, but also to you as Planning Commissioners. It is attached to this cover note.

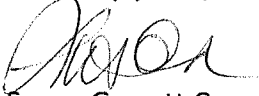
It was our hope that the Dissenting Statement may highlight for discussion some what we believed to be questionable -- or at the very least debatable -- assumptions that underlie the WACP recommendations.

Citizens of this town have the right and obligation to decide what kind of community they want to design for the future as population pressures increase. The signers of the Dissenting Statement were concerned that the recommendations of the WACP will prematurely invite overcrowding without in fact offering affordability, and urged that they be examined with an independent and critical eye.

I have a further individual concern that the official notices developed for this file are so vague and general as to be meaningless and offer no guidance to the public as to what specific issues will be dealt with, or when, or how. It would facilitate meaningful public participation if this could be remedied.

Thank you for your attention.

Sincerely yours,



Susan Garrett Crowley

CC: File

October 11, 2017

**TO: Joe Dills and Andrew Parish, Angelo Planning Group
Kevin Liburdy, City of Hood River Senior Planner
Hood River City Council
Hood River Planning Commissioners**

**FR: Project Advisory Committee members Brian Becker, Bob Schuppe,
Denise McCravey and Susan Crowley**

**RE: Westside Area Concept Plan (WACP)
Project Advisory Committee Dissenting Statement**

We do not support the consultants sending these complex WACP recommendations to the city for consideration. There has been inadequate time for anything more than superficial citizen review. We have concerns that temptation will be strong to push through this pre-assembled package too quickly for careful consideration of its implications and consequences.

Should the consultants nevertheless forward its package to the city, we ask that this memorandum be included as part of the forwarded package. We offer these alternative recommendations to the City Planning Commission and City Council:

- Do not at this time consider blanket amendment of the present zoning ordinances and zoning map, up-zoning (particularly in or adjacent to existing neighborhoods), or adding a new zoning definition. All are premature and unnecessary, and will result in unintended consequences. Existing zoning is adequate, particularly if the city further encourages development of multi-family housing in C-2 zones.
- Before changing zoning in any way, adopt and have in place all workable mechanisms recommended by the WACP to fully fund the infrastructure and services needed to support yet more density than originally planned: roads, schools, police and fire protection, parks, connected trail and bike path systems, freshwater supply, and emergency services.
- Do not at this time consider any of the WACP recommendations city-wide. Residents outside the Westside have received no notice they may be affected. City-wide application is outside the scope of work for the WACP, and was not even superficially reviewed by the project.
- Selectively accept as appropriate some of the proposed alterations to the Transportation System Plan with an eye to emergency fire evacuation issues and the long-term needs of the community as it grows.
- Establish a process for extensive public participation and feedback, open to any interested citizen, to occur before the City initiates any zoning code, map, or Comp Plan.

Our reasoning for these recommendations is detailed below in the Background Discussion.

BACKGROUND DISCUSSION

When the Westside Area Concept Plan (WACP) first got underway in the fall of 2016, there were lofty goals. The Plan's "vision statement" spoke of:

Streets, trails, and paths that are walkable, connected and green . . . Neighborhood design that celebrates the landforms, views and magnificent landscape of Hood River . . . [and o]pen spaces and parks that support community gathering and a connection to nature.

The Plan's "guiding principles" promised to:

Incorporate natural features and a sense of place into each neighborhood and district . . .
Include open space and parks integrated in neighborhoods . . . Provide a connected transportation network with walkable, bike-friendly, and green streets . . . Promote active and healthy living through community design . . . Promote human-scaled building designs . . .
[and p]rovide a realistic infrastructure funding strategy . . .

It is now the Fall of 2017. The Angelo Planning Group has largely completed its work and plans to deliver to the city a collection of recommendations that will likely envision a very different future for Hood River.

Rather than green streets and neighborhoods that incorporate open space, parks and trails, the WACP reduces lot sizes and increases the number of living units to be built on those smaller lots. Rather than accommodating future growth by beautifying Hood River, the WACP exacerbates congestion and noise, and provides no concrete funding mechanism for improving roadways, parks, trails, public schools or emergency services – all of which will be negatively impacted by increased density.

The proposed changes are too aggressive and premature. The changes may be suitable for larger urban areas, but they will completely change the face of Hood River and are not right for our small destination town.

THERE IS NO NEED FOR INCREASED DENSITY.

The WACP has not advanced a credible argument to show need for increased density on the Westside, particularly now that official population growth estimates have dropped.

The WACP comes less than two years after the 2015 city *Housing Needs Analysis* concluded that "Hood River's residential land supply is essentially enough land to meet expected growth of new residents in Hood River over the next 20 years" for all income levels through 2035.¹ Land supply was found adequate for all housing types, although a tight fit, with no changes in present zoning other than taking steps to maximize multifamily housing development already allowed in C-2 zones.

Under state law, once this standard is met, the city need take no action at all to further increase density over a 20-year period.² Yet, the WACP recommends increasing density.

The *Housing Needs Analysis* assumed an annual population growth rate of 2%. However, that has changed. More recently, Portland State University concluded the officially-recognized average annual population growth estimate for Hood River through 2035 has **dropped** 30% from 2% to 1.4% since 2015.³

Yet, the WACP recommends increasing density.

The consultants have now produced a new memo⁴ by Beth Goodman which acknowledges that under the new 1.4% forecast 650 fewer new dwelling units will be needed. This is half the number of new units expected to be developed in the Westside under existing zoning⁵ based on the old 2% forecast.

THE WACP COST-BURDENED ARGUMENT IS OVER-STATED.

The Goodman memo then bypasses this complication by shifting the conversation. It argues that because housing in this high-demand Hood River market is so expensive, some residents at all income levels are “cost burdened,” and consequently their housing needs are defined as unmet.⁶

But the memo overstates the argument. The WACP accepts the HUD standard that for housing to not “cost burden” a household it should be cost less than 30% of household income. By this measure, according to the *Housing Needs Analysis*, 32% of Hood River residents are defined as “cost burdened.” This means that Hood River is doing better than the county (35% cost-burdened), the state (40%), and the nation (35%).⁷

The Goodman memo also assumes that the city is obligated to take steps to promote density to assure below-market housing prices not only for present residents, but also for “people who would like to live in Hood River,” whether or not they work here.⁸ Nothing in land use law requires this obligation, even if it were possible to achieve in a free-market economy.

There is a quiet elephant in the room: Although much of the conversation is framed in terms of assistance to low-income resident workers, this project is clearly impacted by concern for employees of the growing high-tech and spinoff industries who would prefer living in Hood River to other Gorge and Hood River Valley towns. Important community questions are whether and how much we want to change the essential nature of the town to accommodate this.

Let’s set these questions aside for the moment. If the local market has failed to produce housing that residents and “people who would like to live in Hood River” can acquire for less than 30% of their income, the WACP assumes that significantly increasing density of development will create that affordability. However, the WACP has not produced any evidence in support of that assumption.

DENSITY HERE WILL NOT CREATE AFFORDABILITY.

The WACP assumes that the city is obligated to take action to assure housing prices will be low enough in a high-demand resort market to allow local households and anyone “who would like to live in Hood River” to spend less than 30% of income on housing.

There are certainly studies which argue that density creates affordability. They use as their examples such cities as Houston, Chicago, Montreal, and Las Vegas.⁹ Hood River is not like any of these major metropolitan areas. It doesn't want to be Portland or Houston, which demonstrated very clearly the hazards of over-paving vulnerable landscapes after Hurricane Irma.

Hood River is a small town in gorgeous surroundings with a growing high-tech population and affluent second-home seekers and dedicated recreationists. It's the victim of its own success in building a desirable high-tech and destination image for itself: If we build it, they will come; and they will pay top dollar for it, often in cash. The free market responds to the highest bidder.

Nevertheless, the WACP persistently assumes that increasing the number of dwelling units here will increase affordability. It has provided no evidence to support this assumption in this high-demand market. And if you read closely, you will see that the WACP admits in a June 2017 memo that simply zoning for increased density cannot assure affordability.¹⁰

This is a common problem in small destination communities that so far has no real solution short of government-financed housing on government-owned land. If we find a solution, we can be sure Aspen, Sun Valley, and Jackson Hole would love to hear about it.

Here, all that is really guaranteed when more dwelling units are built on smaller lots is that more dwelling units will be built on smaller lots. In this high-demand local economic environment, zoning for more density will only serve to create dense, expensive housing.

INFRASTRUCTURE NEEDS ARE UNMET EVEN WITH PRESENT ZONING.

We are a small town of just under 8,000. The WACP consultants, based in downtown Portland,¹¹ want to treat us like Portland, which has over half a million residents and a wealth of financial resources, a developed infrastructure, and a dedicated urban parks bureaucracy.

Hood River has few of those resources. Our small-town streets are beginning to experience rush-hour and intersection congestion. Park acquisition is largely unfunded and unplanned. There are virtually no parks in the entire Westside. Schools are crowded even under existing growth rates and deteriorating. Volunteer first-responders and emergency systems are pressured. Wastewater treatment facilities are strained and overflowing. Public transportation is minimal.

Horrifying wildfire events this week in northern California and last month not five miles from our own town should offer a warning. People died in California unable to evacuate. Some tried to flee on foot. Could Hood River's road network support the flow of evacuees and emergency responders

if another wildfire swept even closer next time? We know the answer to that. We can barely navigate some intersections now at certain times of the day.

Yet the WACP recommends zoning for densities 50% greater than what is expected under current zoning.¹² New Westside dwelling units under are projected to increase by 2035 from 1,133 under present zoning to 1,713 under WACP recommended up-zoning. This does not even factor in additional density from WACP-recommended changes to the zoning code ordinances themselves, which would apply city-wide.

Our city's policy decisions too often seem to maximize the negative impacts of development that already occur under existing zoning: Developers enjoy forgiveness of fees meant to pay for the infrastructure their buyers will require. New developments minimize greenspace and stormwater absorption to pave the maximum possible ground. Building design standards and setbacks are minimal, and three-story townhouses are packed in lot-line to lot-line. Gardens and trees disappear. Protection of existing natural features and vegetation is discretionary and rarely enforced. Park acreage is sacrificed for housing.

There is no free lunch. These and similar policy decisions put stress on both the structural foundations and natural resources of our community. We cannot create even more density and maintain a good quality of life without supporting the foundations on which new construction relies.

EXPANSION OF THE MISSION CITY-WIDE VIOLATES PUBLIC PROCESS.

Since the Westside has the most undeveloped land and would bear the brunt of recommended density increases,¹³ the WACP now suggests that increasing density could be considered city-wide through zoning code changes and universal mass up-zoning.¹⁴ Though this may be slightly less burdensome to Westside residents, in fairness there has been no advance notice to the general city public that this project could directly affect them in such fundamental ways.

In addition to violating the notion of good public process and public trust, this expansion of the WACP mission also violates the Scope of Work that defines the WACP's charter. City-wide application was never evaluated meaningfully, if at all, by the project. This is a public conversation that should be engaged separately from any consideration of the WACP.

PAUSE TO ALLOW MORE CAREFUL CONSIDERATION.

Much more time is needed to evaluate the meaning, implications and possible unintended consequence of zoning code changes proposed by the WACP to increase density. We offer no support for these proposals. We do not believe this convenient ready-made package should be forwarded to the Planning Commission. We have concerns the Planning Commission and City Council will yield to the temptation to fast-track the package through the process without time to study them and properly understand their implications city-wide.

In fact, the "transect planning" concept mentioned by WACP consultants -- smooth transitions in development density from urban to rural areas -- is well addressed by the current zoning

designations and standards. Before consideration of any changes to designations or standards, these issues at minimum should first be addressed:

- A systematic recalculation of the conclusions of both the WACP and the *Housing Needs Analysis* is needed under the new reduced projected growth figure of 1.4%. This should must occur before any up-zoning or change in zoning standards is contemplated. The city should maintain existing zoning map and ordinances until this is done.
- A funding profile should be identified for infrastructure to support both (a) projected development under existing zoning; and (b) projected denser development under specific proposed changes. Those two results should be compared and discrepancies addressed so that funding does not lag behind development.
- The city should identify funding sources¹⁵ and have in place adequate funding for
 - purchasing land at current market rates for three neighborhood parks, an additional community park, bike paths, and trails in the Westside; funding for development and maintenance of these resources;
 - construction of new schools that will be required for an expanding population;
 - purchasing public land at current market rates for lease to developers of guaranteed subsidized low-income rental housing;
 - construction of expanded wastewater facilities; assuring adequacy of freshwater supply and delivery systems; and
 - expansion of staffing for police, fire response and emergency services.
- The process and schedule going forward for coordinating with the County and UGA citizens should be made explicit. Divisions of responsibility and authority should be made clear.
- An in-depth analysis of the traffic impacts identified in the DKS Traffic Analysis and funding shortfalls should be completed under both present zoning and any proposed changes, and ODOT approval received for needed mitigations.

Of particular initial concern in the proposed zoning code amendments are the following proposals:

- A new R-2.5 (or R-2A) zone with a lower minimum lot size of 4,000 square feet (vs. 5,000 square feet for the current R-2 zone) for a single family home, duplex, or townhouse building.
- General reductions in R-3 of minimum lot size, and for duplexes, triplexes, multifamily and townhouses; exceptions to minimum lot sizes proposed for R-2; reduction of minimum lot size for townhouses in R-3 to 1,750 square feet.
- Density bonuses of up to 50% that increase the pack of already-dense lots in unpredictable ways.
- Elimination of any public review process in certain circumstances.

- Massing of on-street parking.
- Minimum density requirements for land division and building sites.
- Lack of meaningful height restrictions to offset the impacts of increased density.
- No provisions assuring provision of open residential greenspace areas, parks, or trails.
- Mandatory hard surfacing of driveway and parking areas.
- Pick-lists of relatively weak design standards that apply only to the street-facing elevation.

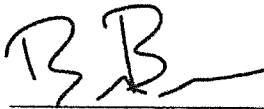
CONCLUSION

The WACP's insistence on moving forward with density recommendations despite so many unresolved issues creates the appearance that it is pushing a pre-determined conclusion. And, in fact, a review of the 2015 grant application that funded the WACP affirms just that: This was a project with the announced purpose of promoting development density in the hope of creating affordability, a preferred outcome that needed to be sold to Hood River citizens.¹⁶ It was less a research effort than a sales effort.

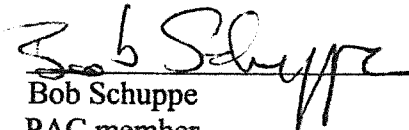
Some of us on the WACP Project Advisory Committee are skeptical of the pitch. We understand that in a world of increasing population pressure, changes will occur. We understand the city's desire for tax revenue from development. Nevertheless we as the community's residents have a right to have a voice in shaping the kind of town we want to live in.

For many of us, Portland is not the model we want to follow. These WACP recommendations, designed to address bigger-city Willamette Valley problems, would prematurely invite overcrowding without providing affordability in our unique economy.

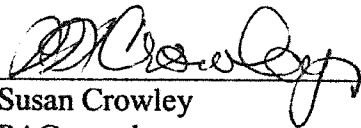
Respectfully submitted:



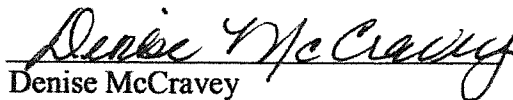
Brian Becker
PAC member



Bob Schuppe
PAC member
Chair, Hood River County Planning Commission



Susan Crowley
PAC member



Denise McCravey
PAC member

NOTES:

¹Housing Needs Analysis, p. 47-49.

² ORS 197.295 *et seq.* In 2015 the requirement to do a *Housing Needs Analysis* did not even apply to a small town the size of Hood River. ORS 197.296(1)(a) (as of 2016).

³ Acknowledged in the memorandum of Sept. 28, 2017 from Beth Goodman to WACP consultant Joe Dills, Angelo Planning Group, "HOOD RIVER QUESTIONS ABOUT THE HOUSING NEEDS ANALYSIS," p.2.

⁴ Memorandum of Sept. 28, 2017 from Goodman to Dills.

⁵ An expected development capacity of 1133 new units was assumed in the Westside under existing zoning. Slide presentation by Angelo Planning to the PAC, dated July 5, 2017, slide 12, <http://www.oregonapa.org/wp-content/uploads/2017/05/OPN-Hood-River-presentation.pdf>.

⁶ Goodman's Sept. 28 memo at p. 3-4. The memo uses anecdotes to support "finds in the data analysis that Hood River does not have enough housing to meet the needs of current residents and workers at businesses in Hood River." It is unclear what "data analysis" is meant, unless this is another reference to the argument that "cost burdened" housing cannot be viewed as meeting housing needs.

⁷ *Housing Needs Analysis*, p. B-18, pp. B-42 through B-46. "Cost-burdened" is defined by HUD guidelines as payment of more than 30% of household income for housing. It is assessed for all income levels, rich and poor alike.

⁸ Goodman memo, pp. 3-4.

⁹ See, for example, <http://www.sightline.org/2017/09/21/yes-you-can-build-your-way-to-affordable-housing/>.

¹⁰ Memo of June 21, 2017 from Joe Dills and Andrew Parish to the PAC, at p. 3. The memo acknowledges that short of invoking the newly legislated tool of inclusionary zoning (mandating a percentage of affordable housing in new development), there is essentially no way denser zoning can ensure affordability. There is mention in this memo of recent consultant work for The Dalles, Tillamook, and Newburg, but no indication any of these cities have implemented any actions suggested, with the exception of an excise tax in Tillamook. Memo, Attachment C, pp. 9-11.

¹¹ <http://www.angeloplanning.com/>.

¹² Final WACP *Concept Plan Report*, Oct. 4, 2017, p. 56.

¹³ The Westside of Hood River has by far the largest amount of undeveloped land in the UGB area. HNA, Map 2 at p. 8.

¹⁴ See the top of each page in the WACP Potential Code Amendments, released Sept. 14, 2017: "City to determine what standards apply in the Westside Area or city-wide." There are also numerous suggestions of city-wide application throughout the WACP documents, and there was discussion of this at the joint WACP/City Council meeting on May 22, 2017.

¹⁵ The memoranda presented by the WACP have offered a number of useful avenues for planning funding for needed infrastructure and greenspace areas. Many of these options should be actively pursued by city officials before any discussion of up-zoning. They will be essential to accommodate change regardless of any zoning code changes.

¹⁶ View the original WACP grant application prepared by Senior Planner Kevin Liburdy and WACP PAC member Heather Staten at <http://www.oregon.gov/LCD/TGM/docs/Grants/hoodriver.pdf>. See also minutes of the Hood River Planning Commission, April 18, 2016, p. 6.