

April 9, 2026

City of Sandy
City Council
39250 Pleasant Street
Sandy, OR 97055

RE: Request to Reconsider the “Already in City Limits” Requirement for the Residential ERU Lottery (Resolution 2026-04)

Dear Mayor Walker and Honorable Members of the City Council, I am writing to respectfully request that the City Council reconsider one specific requirement in the new Development Allocation Program established by Resolution 2026-04.

Section 10 of the Resolution currently requires that a property must already be located within Sandy city limits in order to qualify for entry into the Residential ERU Lottery. While I understand the City’s need to manage limited sewer capacity carefully, this requirement creates a significant barrier for property owners whose land is immediately adjacent to the city or within the Urban Growth Boundary.

Requiring annexation before the lottery forces property owners to spend considerable time and money on the annexation process with no guarantee of receiving any ERUs. Many owners, including myself, are unwilling to incur the expense and risk of annexation unless we know we will actually be able to develop the property. As a result, this rule effectively eliminates qualified properties from consideration and reduces the number of applicants who could participate in the lottery.

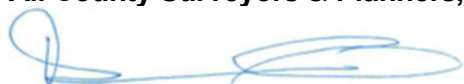
I believe a modest change would better serve both the City and property owners: allowing property owners to submit an application and enter the Residential ERU Lottery contingent upon successful annexation if they are selected. This “conditional” approach would:

- Encourage more participation in the lottery
- Allow the City to allocate its very limited ERUs to the strongest projects
- Still ensure that only properties inside city limits ultimately receive ERUs and building permits
- Align with the City’s goal of accommodating housing needs “as much as possible” under ORS 197.520

I fully support the City’s efforts to manage sewer capacity responsibly and appreciate the difficult position created by the Consent Decree. I am simply asking for a practical adjustment that removes an unnecessary obstacle while still protecting the City’s interests. Thank you for your time and for your continued work on this important issue.

Sincerely,

All County Surveyors & Planners, Inc.



Darren Clow
President