

**Unlikely Alliance:
How Oregon Addressed Exclusionary Zoning in the 1970s**

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This case study presents an important missing narrative in the evolution of anti-exclusionary zoning initiatives during the 1970s and 80s in the U.S. While the Mount Laurel decision in New Jersey provided a legalistic, court-based approach (Kirp, Dwyer & Rosenthal, 1995), in Oregon a planning-oriented approach to addressing exclusionary zoning evolved during the early years of the state’s land use program. The efforts of an unlikely alliance of advocates who monitored the state review of local comprehensive plans resulted in a multi-year process of defining and refining the key concept of “needed housing,” which was central to Oregon’s approach to exclusionary zoning.

This study highlights the role of Betty Niven, a citizen volunteer, faculty wife and astute analyst who cut her teeth as a planning commissioner in the city of Eugene, Oregon, and then went on to leave her mark at the state and national level. It also focuses on the role of one particular housing type—manufactured housing—in the evolution of Oregon’s approach to addressing exclusionary zoning. The inclusion of and attention to housing within Oregon’s apparatus for the development and recognition of local comprehensive plans resulted in part from the nearly simultaneous formation of a state housing agency and a state planning agency. They evolved together. It is with the formation of the state housing agency that this narrative begins.

Betty Niven, Mobile Homes, and the State Housing Council

Oregon created the State Housing Council and the State Housing Division in 1971. The agency served as the conduit for new housing finance programs initiated by the U.S. Department of Urban Development (e.g., HUD Section 8 New Construction), established state bond-funded programs to promote affordable homeownership through low cost mortgages, and addressed the needs of older adults through financing congregate care housing. The agency also helped frame state housing policy.

Betty Niven, in alliance with key members of Governor Tom McCall's administration and the lobbyist for the Oregon State Homebuilders, led the effort to convince the state legislature to create the State Housing Division and State Housing Council (Bob Clay, personal communication, October 2, 2008). Niven was appointed to the State Housing Council and served as its chair.

Niven, who held a degree in business from the University of Chicago, moved to Eugene with her husband, a math professor at University of Oregon, in 1947. Her first involvement in the civic arena occurred when she petitioned the Eugene city council for sidewalks for the street where her family lived. Council told her that she would have to get the signatures of everyone on the street. She did, and then attended several council meetings to remind them of their promise. Eventually, sidewalks were installed. Subsequently, the mayor appointed Niven to the urban renewal district authority. Her work there earned her a place on the planning commission when a seat opened up in 1959 (VanLandingham, 2000). The planning commission was very influential at that time, and Niven was an extremely effective member. When Council established a joint committee with the Planning Commission on housing issues, Niven was appointed chair

of the Joint Housing Committee and served in that role from 1967 through 1979 (VanLandingham, 2000).

One of the causes that the Joint Housing Committee took on was an analysis of the impact of mobile homes on the community. Nationally, mobile homes and mobile home parks were on the rise. In 1970, mobile homes comprised approximately one third of all new home starts in the U.S. President Richard Nixon, in his 1970 progress report to Congress on national housing goals, encouraged the development of mobile homes as a form of permanent and affordable housing (Wallis, 1991). Like other places in the nation, Eugene experienced growth in the number of in mobile home parks, and residents responded with concern about the potential impacts on their community (R. Johnson, personal communication, September 12, 2008).

The Joint Housing Committee initiated its analysis in response to a petition to the Planning Commission by the Bethel School Board and the Active Bethel Citizens Club for a moratorium on mobile home parks in that area of the city on the grounds that they resulted in higher school enrollment figures, a smaller tax base and lower community income (Oliver, 1974). The methodical, fact-filled analysis was typical of Niven's approach to addressing complex, controversial questions.

The 36-page report, "Mobile Homes and Mobile Home Parks: Their Place in the Community," analyzed the impacts of four manufactured home parks on the community. The report found that, on average, a conventional site built-home in Eugene had 3.4 times as many school-age children as a mobile home. An analysis of the tax yield per acre led to the conclusion that taxing districts with mobile home parks had not suffered from their presence. Income data derived from a survey of park residents (response rate of 23%)

formed the basis for recommending that it was time to “immediately lay to rest any illusions that mobile home parks are sanctuaries of poverty” (Niven, 1980, p. 10). The report concluded, “It appears only reasonable to provide for mobile homes in the community. Most of the problems attributed to them turn out not to be problems at all” (Niven, 1980, p. 23).

The groundbreaking report had several important consequences. Locally, the City of Eugene amended its zoning ordinance in 1977 to permit and regulate manufactured home parks so that they would provide “a suitable living environment for residents” [and be] compatible with adjacent land uses” (City of Eugene Ordinance No. 17838, 1977). A significant number of new manufactured home parks were built in the Eugene area as a result (R. Johnson, personal communication, September 12, 2008).

The report also garnered attention at the national level and resulted in the appointment of Niven to the National Mobile Home Advisory Council, which advised the U.S. Department of Housing and Urban Development (HUD) on the development of national standards for manufactured housing (the “HUD Code”). Nationally, problems with fire safety, durability and other product quality concerns were garnering attention. In a 1975 book entitled *Mobile Homes: The Low-Cost Housing Hoax*, Ralph Nader’s Center for Auto Safety proclaimed, “The mobile home is a product few people trust” (p. xi). On the other hand, manufacturers were stymied by local building codes that prevented more widespread use of mobile homes. The industry wanted a national standard that pre-empted local and state codes and thus removed building code-related objections from the tools available to states and local jurisdictions to bar mobile homes. In 1974, Congress responded to both set of concerns by requiring HUD to develop

uniform federal building standards that governed the production of manufactured housing (Wallis, 1991). This mandate was included in the Housing and Community Development Act of 1974. The stated purpose of creating a code was “to reduce the number of personal injuries and deaths and the amount of insurance costs and property damage resulting from mobile home accidents and to improve the quality and durability of mobile homes” (Title VI, Housing and Community Development Act of 1974).

The National Mobile Home Advisory Council was comprised of 24 people, equally divided between industry, government and the public. Niven was the only local government representative. She chaired the committee in 1976, the year that the new code went into effect. The Council reviewed copious studies produced by the National Products Safety Commission, the Bureau of Standards and other national groups. Characteristically, Niven extracted data from the wealth of detail, analyzed it and summarized its salient features in a succinct report entitled, “Highlights of The Federal Mobile Home Construction and Safety Standard” (B. Niven, personal communication, November 1975). She wrote, “The things that were of most concern to the Council were the health and safety factors. They don’t make cheerful reading but I am a firm believer in ‘Let’s face it how it is’ and then ‘Let’s see what we can do about it,’ and there’s just no getting away from how it is” (B. Niven, personal communication, November 1975, p. 3). One of the most alarming problems she reported was the flammability of materials commonly used. Although the Council wanted to require all gypsum board wall finishes and ceilings, they did not because the material was brittle and would not survive the transport of the home via highway. Instead, the solution was to impose special wall finishes for places where fires commonly occur. This is an example of one of the many

issues that surfaced in the planning process and how it was resolved.

The adoption of the HUD code in 1976 had several significant consequences. It improved the baseline standards for manufactured home construction. It also increased the acceptance of this housing type because it was now regulated. Finally, the adoption of a federal standard pre-empted local jurisdictions from adopting their own codes or prohibiting this type of housing on the grounds that it failed to conform to the Uniform Building Code. Jurisdictions then had to rely on other means of preventing the construction of this housing type. Nationally, exclusionary zoning remained a viable option for keeping manufactured homes at arm's length.

Niven's hallmarks were her personal integrity and intellect. She was seen as being an impartial, unbiased citizen advocate who did not represent any one industry. She came armed with facts that could not be ignored; one of her favorite tactics was "out-statistic-ing" her opponents (R. Johnson, personal communication, September 12, 2008). Bob Clay, an early staff member at the State Housing Division, said, "I don't think that there was anyone in the legislature who didn't know Betty. I know that there were committee chairs who sought her advice. Legislators sought out Betty to come and testify. Her work touched every conceivable aspect of housing" (R. Clay, personal communication, October 2, 2008).

Housing Finds a Place in Oregon's Emergent Land Use System

In 1973, two years after the formation of the state housing agency, Oregon's Senate Bill 100 created a new state agency, the Land Conservation and Development Commission (LCDC), and an associated staff department (DLCD), which was mandated

to adopt a set of statewide land use planning goals by the end of 1974. Every city and county government in the state was required to produce comprehensive land use plans and implementing ordinances that conformed to the statewide goals. LCDC was authorized to review plans and ordinances for conformance and to take over plan-making and ordinance development if it found that a local government was failing to make satisfactory progress (Adler, 2010).

Developing the first set of fourteen statewide planning goals during 1974 was a major undertaking for the new agency, a process involving many thousands of individual Oregonians as well as representatives of various stakeholder groups; it was fraught with controversy. One of the major points of contention involved the likely conflicts between efforts to restrain urban sprawl in order to preserve farm and forest lands and the availability of land for housing. Preserving land for forests and farms, which were Oregon's two largest industry sectors during the early 1970s, was the major objective for those supporting a new state role in land use planning. However, several participants during the goal development process, including State Housing Council chair Betty Niven, called attention to potentially very serious negative consequences of prioritizing the preservation of resource lands: the price of housing would increase, and the supply of housing that would be affordable for Oregon households would decline.

The first set of draft statewide planning goals included proposals for farmland and forestland preservation; however, a housing goal was not among them. Betty Niven, and Fred VanNatta, the lobbyist for the Oregon State Homebuilders Association, worked hard to persuade LCDC to incorporate a housing goal. Niven met privately with L.B. Day, the founding LCDC chair, to urge the inclusion of a housing goal, and also submitted draft

housing goal and guidelines language to the state land use agency, as did VanNatta. Both Niven and VanNatta drew on an analysis of recent state interventions into land use planning done by two Oregon State University political scientists, who told LCDC that “one of the consequences with land use planning is that it limits the availability of land for development and thereby raises the price of land for housing. Unless this consequence is addressed directly and compensatory measures taken, adequate housing for the lower middle classes may be eliminated.” Niven introduced her proposed housing goal with the argument that “it would be a grievous error for the state not to recognize this potential conflict between housing needs and the conservation of the state’s natural resources and to fail to take steps to minimize it.” She intended a housing goal “to ensure that fulfilling the other goals of the statewide land use plan will not unreasonably impact the supply of modestly priced housing” (Niven, 1974, p. 1).

VanNatta also used the political scientists’ warning about the negative equity impacts of statewide land-use planning to justify calling for the inclusion of housing as a statewide planning goal. He told LCDC: “Shelter equals agricultural land in importance in the citizen’s life. Housing merits equal priority treatment with agriculture” (VanNatta, F. 1974).

The State Housing Council and the State Housing Division also weighed in regarding LCDC’s proposed public participation goal, criticizing much of the engagement they had seen in planning efforts. Division administrator M. Greg Smith argued that “to a large extent, citizen involvement groups in Oregon have sprung up as a negative force, often to prevent low and moderate income housing from being built in given neighborhoods or communities....We are, therefore, very concerned that the

Citizen Involvement Goal could become a tool by those elements who seek to restrict housing opportunities for Oregon citizens with modest incomes.” Affordable housing advocates wanted to prevent the erection of insurmountable obstacles by influential local groups (Smith, M., 1974).

In addition to Niven, Smith, and VanNatta, many environmental activists, who were strong advocates of resource lands preservation, also supported affordable housing objectives. Those activists, members of Oregon Environmental Council (OEC), the Sierra Club, Northwest Environmental Defense Center (NEDC), the Ralph Nader-inspired Oregon Student Public Interest Research Group (OSPIRG), and other organizations, included “maximizing housing opportunities, especially for low and moderate income households, the elderly, and minorities” in their goal proposals.

LCDC was persuaded to include a housing goal among the fourteen that it adopted in December 1974. Goal 10: Housing stipulated that: “Buildable lands for residential use shall be inventoried and plans shall encourage the availability of adequate numbers of housing units at price ranges and rent levels which are commensurate with the financial capabilities of Oregon households and allow for flexibility of housing location, type and density.” The definition of buildable lands included “availability” along with suitability and necessity for residential use. Its inclusion in the goal – goal stipulations were legally binding requirements that would be enforced when LCDC evaluated local plans and implementation actions for conformance – responded to a suggestion from the building industry, which was concerned with land supply.

LCDC intended to address the supply of affordable housing through further elaboration on the language related to price and type. Due in part to the resistance of local

jurisdictions, which retained greater control if state rules remained general, the requirements to “encourage” availability and allow for “flexibility” regarding location, type, and density remained undefined by LCDC.

An Unlikely Alliance for Affordable Housing

One of the key aspects of the early history of the Oregon land use planning program is the creation of an alliance among environmental activists, conventional and manufactured homebuilders, realtors, planners, and affordable housing advocates. They supported policies to facilitate residential development inside urban growth boundaries as necessary complements to regulations to preserve farm and forest lands outside them. 1000 Friends of Oregon, the land use watchdog group that emerged from the mix of environmental organizations, especially OEC, OSPIRG, and NEDC in 1975, played a leadership role in establishing the alliance. 1000 Friends attorneys began meeting with building industry and related groups as well as local government planners in 1976 to highlight the ways in which LCDC’s Goal 10 could and should be used to expand the supply of affordable housing by transcending the limits set by exclusionary zoning practices. Many in the construction industry, especially in the Portland metropolitan area, as well staff in the state land use and housing agencies, responded positively (Adler, 2010).

Unlike their urban counterparts, planners working in many suburban settings faced serious challenges to their ability to participate actively in the alliance because of opposition from residents and their elected representatives. A propos of such opposition to lower cost housing, a 1969 article in *Planning*, the magazine of the American Society

of Planning Officials at the time, suggested that suburban jurisdictions might have trouble recruiting and retaining recent graduates of planning programs because of it. “The new crop of planners is concerned above all else with man’s inhumanity to man....The new planner....sees the reverse side of exclusionary practices in zoning and subdivision control as serving to contain less-favored population in the central city slums....He relates the lily white (or token integrated) suburban school system to the desperate problem of maintaining racial balance in the central city’s schools. He sees suburban support for expressway systems as the source of further damage to central city neighborhoods and central city people. He views the entire operation as a rigged game, the deck unbelievably stacked against the poor and the black central city dweller, and he doesn’t want to deal for a crooked house.” The author thought that such graduates would flock to regional and state agencies where they were more likely to contribute to efforts to solve those problems (Bartel, 1969). LCDC and its housing goal, as well as a unique regional planning entity in the Portland metropolitan area, provided such opportunities. Because of this informal support network at the state and regional level, some planners interested in social issues did take positions at the local level and advocated on behalf of affordable housing.

The Evolution of the Needed Housing Concept

Alliance members closely scrutinized the housing-related elements of local government plans and implementing ordinances that were being developed, as well as relevant legal decisions made by LCDC and the Oregon courts. Following an Oregon Court of Appeals decision that found that a county ordinance prohibiting “trailer homes”

did not apply to mobile homes, for example, 1000 Friends of Oregon staff attorney Richard Benner wrote an article titled “Mobile Homes Can Help Meet Oregon Housing Needs” (Benner, 1977). He argued, “City or county zoning ordinances that unreasonably limit mobile homes without regard for the housing needs mobile homes can meet would violate the Housing Goal.” However, shortly after the Benner article appeared, the Oregon Supreme Court reversed the Appeals Court decision. The Supreme Court held that a county ordinance prohibiting ‘trailer houses’ in certain districts was legitimate, was also applicable to modern mobile homes, and did not contravene state planning goals (Morgan, 1984). This unfavorable decision mobilized alliance members.

In May 1978, Dave Ingwood, planning director of the Mobile Home Dealers Association, wrote to the DLCD director, Wesley Kvarsten, to thank him for meeting with the Association’s Joint Land Use and Legislative Committees, thereby opening up lines of communication between the state agency and the industry. However, the industry leaders still weren’t convinced that LCDC was according equal weight to all of the statewide goals. “The question now becomes one of how we proceed toward establishing Goal #10 to a priority basis equal to that of the Agricultural Goal and the Urban Growth Boundary Goal?” Ingwood assured Kvarsten that “Our industry is totally committed to establishing manufactured housing as a viable source of low cost housing and asks no special favors, only that manufactured housing be treated on an equal basis with conventional housing” (Ingwood, 1978).

The equal basis notion had been embodied in a 1975 legislative proposal that died in committee without a hearing at session’s end. If approved, House Bill 2720 in that session would have mandated equivalent treatment of mobile homes and single family

residences for planning and zoning purposes, and required local governments to allow placement and occupancy of mobile homes upon land designated for single family residences.

Three months after the Ingwood letter (August 1978), LCDC adopted an important policy statement that related to manufactured housing. LCDC said, “Where a need has been shown for a particular type of housing, it should be permitted outright in some zones, although it may be a conditional use in other zones. Care should be taken to remove vague approval standards from zoning ordinances” (Kvarsten, 1979). Shortly after the LCDC action, 1000 Friends successfully challenged a small city’s draft land use plan and implementing ordinances because mobile homes were not permitted outright in any zones; they were permitted as a conditional use in some areas. 1000 Friends argued that the city proposal “violates Goal 10 because...the discretion to grant or deny a conditional use is so great there is no guarantee that future city administrators would actually permit any mobile homes under the plan” (Hanson, 1978). In 1979, an amended version of the policy statement, called the “St. Helen’s Policy” in reference to the city whose actions triggered the revision, required that standards, conditions and procedures for needed housing be clear and objective and not involve unreasonable cost or delay that might result in discouraging such housing.

In light of the Supreme Court decision allowing jurisdictions to prohibit manufactured housing, the propensity of local governments to do so, and the practice of requiring conditional use permits where manufactured housing was allowed, alliance members sought a legislative remedy. Their attempt in 1979 to lobby for a law requiring that communities statewide accept a specified percentage of mobile homes within their

jurisdictions was unsuccessful. However, in 1979 the Oregon Legislature did adopt a Joint Resolution saying that while LCDC had “taken “significant steps to assure all residents of the state affordable housing...it appears that local governments are not in fact meeting those housing needs.” The Legislature resolved that LCDC “shall continue its efforts to insure that the housing needs of all citizens are in fact met by local land use plans...and that the Land Conservation and Development Commission urge local governments to pay particular attention to insuring that adequate provision is made for the siting of mobile homes, mobile home subdivisions and mobile home parks” (Senate Joint Resolution 8, 1979).

A controversial LCDC decision approving Multnomah County’s comprehensive plan and implementing ordinances in 1980 galvanized 1000 Friends, the building industry, and the State Housing Council into action during the 1981 legislative session to counter what those alliance partners saw as threats to the achievement of affordable housing objectives (Greenfield, 1981). The role of manufactured homes in the county’s Goal 10-related strategies was a key dimension of the controversy. Metro, the Portland area regional government charged with coordinating and evaluating the plans and ordinances produced by the local governments within its jurisdiction, posed the issues this way:

If the goal [#10] is interpreted to require identification of needs for specific housing types (including mobile homes), the County’s provisions are inadequate. No specific need for mobile homes has been identified. Further, although the potential for mobile homes is provided for in a variety of urban zones, the procedures for approval involve vague and discretionary criteria which allow for their exclusion. On the other hand, if Goal #10 is not interpreted by LCDC to require specification of need by housing type, but rather to require identification of need for a variety of income levels and clear and objective zoning criteria for housing to meet this need, the County complies with this goal (Metro, 1980).

The Mobile Home Dealers Association challenged the county plan and zoning ordinance, as did 1000 Friends of Oregon, based on the reasons identified by Metro as grounds for a conclusion that LCDC requirements for Goal 10 were not met. However, DLCD staff recommended that the approach to needed housing in county plan and zoning ordinance be approved, and LCDC agreed. Their interpretation of the goal was that local governments were not required to specify in the plan that manufactured housing was a type necessary to meet forecast housing needs, and thus did not have to permit it outright in their zoning ordinances (DLCD, 1979, 1980). Feeling thwarted by LCDC, the alliance partners turned to the state legislature for a remedy.

In 1981, the alliance advocated strongly on behalf of Senate Bill 419, which identified *specific types* of needed housing, including manufactured homes. Senate Bill 419 said, “The availability of affordable, decent, safe and sanitary housing opportunities for persons of lower, middle and fixed income, including housing for farmworkers, is a matter of statewide concern...When a need has been shown for housing within an urban growth boundary at particular price ranges and rent levels, needed housing shall be permitted in a zone or zones with sufficient buildable land to satisfy that need.” Furthermore, the bill codified the policy that LCDC had originally articulated in 1978 by requiring that any conditions, standards, and procedures adopted by a local government be clear and objective, and not discourage a particular housing type by unreasonably increasing its cost or delaying its construction. The policies and implementation strategies in the bill took precedence over contrary local government regulations. Senate Bill 419 was approved by the state legislature.

Concessions were made to local governments, however. Although needed housing was defined in the bill to include manufactured homes, local governments did not have to use that definition until their plans and ordinances went through periodic review, which would occur, on average, five years after their initial plans and ordinances were approved by LCDC. The new policy applied to mobile home parks and subdivisions; it did not require that local governments permit manufactured homes to be located on individual lots within city limits.

In 1983 the legislature addressed an issue that Betty Niven had raised during 1981 as a result of State Housing Council experience attempting to locate low-income housing in a city that had a charter provision requiring a vote of residents to approve a federally funded project. The law enjoined local governments from prohibiting assisted housing, from subjecting assisted housing to approval standards that were not also applied to similar, unassisted housing, and prevented local governments from adopting charter amendments that prohibited any type of needed housing, as defined in the 1981 law, from all residential zones (Rodeman, 1982; Morgan, 1984).

Thus, by the end of the 1983 legislative session, the alliance partners had succeeded in closing a number of avenues that local governments had found to dodge the Goal 10 obligation “to encourage the availability of adequate numbers of needed housing units at price ranges and rent levels which are commensurate with the financial capabilities of Oregon households.” Central to this process was the recognition of manufactured homes as a form of permanent and affordable housing that could fill the need. However, it would take until 1989 for the legislature to require that local jurisdictions allow stand-alone manufactured homes in residential zones.

Conclusion

Like New Jersey's family of Mount Laurel decisions, Oregon's approach to prohibiting exclusionary zoning evolved over a period of years. Unlike New Jersey, where an activist judiciary took the lead, in Oregon the process was led by an unlikely alliance of construction industry associations, environmental watchdogs and the State Housing Council. Their tactics included responding during the public comment period associated with the state review of local comprehensive plans, challenging the decisions of the state planning agency, advocacy in their newsletters, and lobbying the state legislature. The context for the evolution of Oregon's anti-exclusionary zoning legislation was planning. The objective of the alliance members was to prod the state into being more explicit about the requirements associated with needed housing, especially the specification of needed *types* of housing for which jurisdictions must plan to accommodate and encourage. The result was an approach to discouraging exclusionary zoning by requiring local jurisdictions to plan for the kinds of housing needed by and affordable to a broad cross-section of Oregonians, including those with fewer resources.

References

- Adler, Sy. 2010. "Oregon Plans: The Making of an Unquiet Land Use Revolution." Unpublished manuscript.
- Bartel, Robert. 1969. "For suburban planning commissioners and others." *Planning*. April.
- Benner, Richard P. 1977, September. "Mobile homes can help meet Oregon needs." *1,000 Friends of Oregon Newsletter*.
- Center for Auto Safety. 1975. *Mobile homes: The low-cost housing hoax*. New York: Grossman.
- Greenfield, Mark. 1981. "Legislature Adopts Strong Housing Law." *1,000 Friends of Oregon Newsletter*. September.
- Hanson, Heather. 1978. "Housing Update." *1,000 Friends of Oregon Newsletter*. August.
- Ingwood, Dave. 1978. Letter to Wes Kvarsten. May 15. Land Conservation and Development Commission files, Oregon State Archives.
- Kirp, David L., Dwyer, John P., & Rosenthal, Larry A. 1995. *Our town: Race, housing and the soul of suburbia*. New Jersey: Rutgers University Press.
- Kvarsten, Wesley. 1979, April 18. Memorandum to Mayors, et al.
- Morgan, Terry. 1984. "Exclusionary Zoning: Remedies Under Oregon's Land Use Planning Program." *Environmental Law*, Volume 14.
- Niven, Betty. 1974, November 26. *Proposal for a statewide housing goal as an element in the statewide land use goals and guidelines*.
- Niven, Betty. 1980. *Mobile homes and mobile home parks: Their place in the community*. Eugene, OR: Joint Housing Committee.
- Oliver, Don. 1974. "Moratorium on park hit with facts." *Easy Living: Buyer's Guide to Mobile Homes*, 1(3), 1, 7-8.
- Oregon Department of Land Conservation and Development. 1979-80. Multnomah County Acknowledgement files, Salem, OR.
- Oregon House and Senate Journals. 1979. Senate Joint Resolution 8.

Rodeman, Richard. 1982. "Proposals and Possibilities: The 1981 Legislative Response to Housing Needs in Oregon." *Willamette Law Review*, Volume 18.

VanLandingham, John. 2000. "Betty Niven: The mother of modern planning in Eugene." In Kathleen Holt & Cheri Brooks (Eds.), *Eugene 1945-2000: Decisions that made a community* (pp. 61-85). Eugene, OR: The City Club of Eugene.

Wallis, Allan D. 1991. *Wheel estate*. New York: Oxford University Press.