

Local Residential Development Process Improvement (LRDPI) Study

► PREPARED FOR the Oregon Legislature



PUBLIC REVIEW DRAFT

JULY 2026



Acknowledgements

Housing Production and Accountability Office (HAPO), a joint office of the Department of Consumer and Business Services, Building Codes Division (DCBS, BCD) and the Department of Land Conservation and Development (DLCD), led this study in collaboration with a consultant team.

About HAPO

Established by [Oregon Senate Bill 1537](#) (2024), HAPO partners with local governments and housing developers to navigate state housing laws related to land use and permitting, providing funding, guidance, and technical support to minimize barriers to housing production and ensure compliance with state laws and regulations.

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Executive Summary

Study Purpose and Scope

The Oregon Legislature directed the Housing Accountability and Production Office (HAPO)¹ to study the residential development review process and identify improvements and best practices to support housing production and affordability. In response, **the Local Residential Development Process Improvement Study examines barriers across three phases of local review: land use approvals, public improvements review, and building plan review.** A companion study focuses on state agency processes related to residential development. This study does not address other potential barriers to housing production such as construction costs, local fees, financing, infrastructure funding, or land availability.

Problem Definition

Oregon has a long track record of emphasizing clear and timely local reviews for housing development. Nonetheless, surveys and focus groups conducted for this study highlighted a wide range of process challenges.

Development review is complex. It often involves multiple reviews by land use planners, building officials, public works departments, special districts, and/or state agencies. Each review has its own timelines, priorities, and information needs. This fragmentation can be difficult for applicants and local governments to navigate.

State “shot clock” laws require local governments to complete certain land use, building, and public works reviews within specified time frames. Even so, the cumulative time for all reviews is often measured in months or years, especially for complex projects. Reviews can also add cost when applicants must revise plans multiple times or show how they meet detailed requirements. These challenges have consequences for housing production. In three illustrative housing development scenarios, doubling local review time delayed financial returns enough to make projects less attractive to investors. A complex process with more rounds of revisions was estimated to increase design and engineering costs by \$24,000 to \$32,000 per unit. **Together, added costs and delay can make otherwise feasible developments infeasible.**

Specific issues that stood out in surveys, focus groups, and case studies include:

- **Unclear submittal requirements.** Applicants may need several attempts to provide all the information required for review.
- **Inconsistent or conflicting review comments.** Applicants may need to revise designs multiple times when reviewers interpret standards differently, provide conflicting direction, or raise new issues late in the process.

¹ Senate Bill 1537, 2025

- **Sequential review bottlenecks.** Projects can stall when applicants must wait for all reviewers to finish before seeing comments, complete final infrastructure details before creating buildable lots, or wait for addresses before submitting building permits.
- **Uncertainty about required public improvements.** Negotiations over what infrastructure a project must build, such as new or upgraded roads, can create uncertainty about project cost, design, and feasibility.
- **Prescriptive land use standards.** Clear and objective standards can still add time and cost when they are so detailed that applicants must spend substantial effort showing compliance or have limited flexibility in project design.
- **Limited local capacity.** Recent housing legislation has required local governments to repeatedly update codes and procedures, train staff, and develop new information for applicants, adding to existing staffing and resource constraints.

Recommendations

The report identifies dozens of best practices to reduce barriers in local development review. Some may involve legislation or state agency rulemaking, but most can be carried out through local action and state technical assistance. Top themes include:

- **Prioritize “getting to yes.”** A partnership attitude from jurisdiction leadership emerged among developers surveyed as the single most helpful practice for reducing process-related barriers to housing production.
- **Improve applicant information & communication.** This can include detailed submittal checklists, early assistance and pre-application conferences, guidance for less familiar housing types, review status transparency, and access to comments upon request before all reviews are complete.
- **Improve reviewer coordination and consistency.** Local best practices include designating housing development project coordinators, improving coordination with outside reviewers, and proactively resolving conflicting comments and interpretations.
- **Allow overlapping reviews when appropriate.** This can shorten review timelines, though it may create some risk of redesign. For subdivisions, avoiding delays at final plat is especially important because developers have already invested in infrastructure, but generally cannot move to building permits or lot sales until new lots are created.
- **Address standards that are creating process issues.** This may include simplifying clear and objective zoning regulations, reconciling conflicting development regulations or infrastructure design standards, and ensuring required infrastructure improvements are predictable and aligned to what development can bear.

A full list of recommendations is provided in the [Recommendations](#) section.

Study Overview

Oregon faces a well-documented housing shortage. The speed and feasibility at which developers can produce new housing depends on many factors, but one critical element is the process and time required for local development review and permitting. In the last decade, the Oregon Legislature has passed major legislation that collectively transforms how local governments plan for and regulate housing, including multiple bills aimed at streamlining local development review. These processes serve essential public purposes, including protecting health and safety, aligning infrastructure investments with growth, protecting environmental resources, and providing opportunities for public input. At the same time, their requirements and timelines can affect housing production outcomes. The critical questions are whether there are further opportunities to streamline or shorten necessary permitting reviews, and where additional improvements are warranted.

Mandated by the Oregon Legislature under Senate Bill 1537 (2024),² the **Local Residential Development Process Improvement (LRDPI) Study** examines residential development review and identifies potential improvements and best practices that support increased housing production and affordability. The study covers all housing types and local governments—cities and counties—across the state. It evaluates local governments' role in development review across three focus areas: **land use approvals, public improvements reviews, and building construction reviews**. The study identifies common process-related barriers within these phases and recommends ways to overcome or streamline them to increase housing production.

Housing production is influenced by many factors, only some of which are within the control of state and local governments. For example, construction costs, and achievable rents or sales prices, and property owner willingness to sell are influenced more by broader market conditions than by state or local government action. Public agencies can influence infrastructure capacity, the supply of developable land, land use policies, and financial assistance or incentives for housing development. However, many of these factors are outside the scope of this study.

This study focuses specifically on barriers within the local residential development review process, as directed by Senate Bill 1537. The report examines how local review processes can affect the cost, predictability, and timeline of housing development. While these processes represent only one set of factors influencing housing production, they are among the areas where local jurisdictions have the greatest opportunity to improve efficiency and reduce unnecessary delays.

² This study meets the requirements of SB 1537, Section 5 (1) and (2), which directed HAPO to produce a study providing findings on barriers to housing production in residential development processes and standards, along with potential improvements, best practices, and considerations that support increasing housing production and affordability in Oregon.

Concurrent Statewide Study

SB 1537 (Section 5 (3)) also directs HAPO to produce another study evaluating state level barriers to housing production. This companion report, the **Evaluation of State Policies and Programs on Housing Production Study**, is being led by the University of Oregon's Institute for Policy Research and Engagement (UO-IPRE) and will identify state-level barriers to housing production and make recommendations to reduce state-level barriers and maximize state programs and resources to support housing production. The two studies have shared insights and findings and aligned their recommendations where appropriate.

Study Methods and Approach

This study drew insight on housing production processes, barriers, and potential improvements from the following sources:

- The project team's professional experience working with and for the development industry and local governments
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- Input from interested parties, such as developers, housing producers, and local government development reviewers through focus groups and a survey
- Review of published research from Oregon and across the country on residential permitting barriers
- Case study research on specific development projects in Oregon
- Analysis of residential permitting data from multiple Oregon jurisdictions
- Pro forma analysis of the impacts of process delays and challenges

Project Team

This study was produced by HAPO in partnership with a multidisciplinary consultant team. HAPO staff from the Department of Land Conservation and Development (DLCD) and the Department of Consumer and Business Services, Building Codes Division (BCD) provided project oversight and direction.

The consultant team was led by EConorthwest and included MIG, Salazar Architect, AKS Engineering and Forestry, and the University of Oregon Institute for Policy Research and Engagement (UO-IPRE).

A full list of project team members is included in the [Acknowledgements](#).

Each of these is described in greater detail below and illustrated in [Exhibit 1](#).

Exhibit 1. LRDPI Study Process



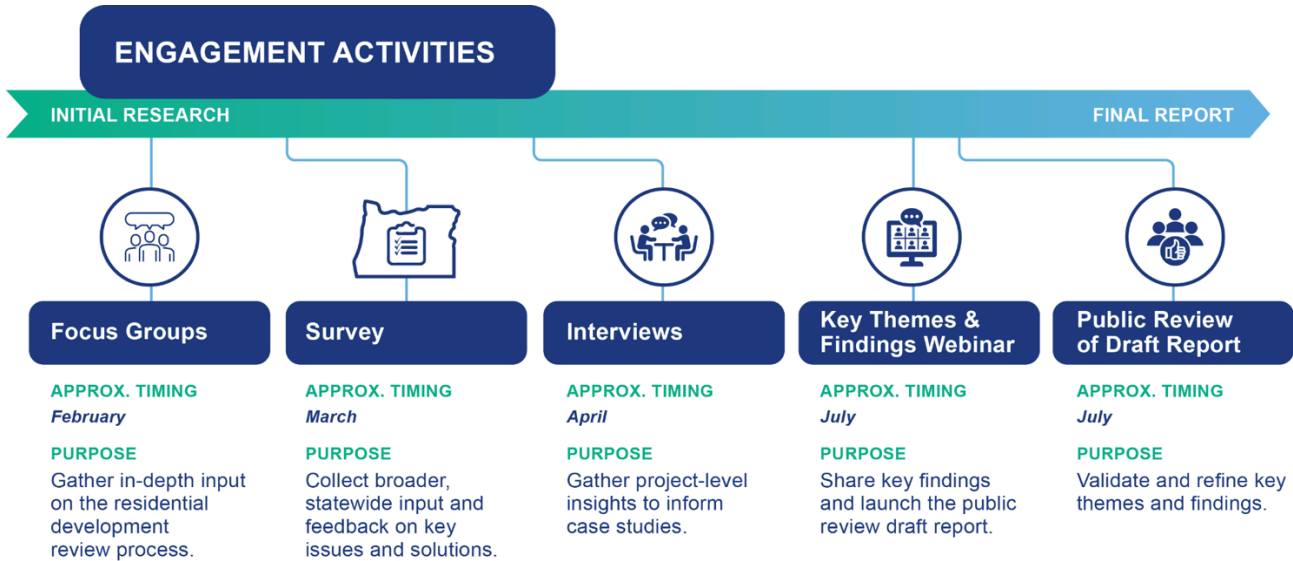
Source: ECONorthwest, 2026

Engagement

The project team conducted stakeholder engagement with both those who administer the review process and those who navigate it to identify common challenges; understand how they vary across housing types, development phases, and jurisdictions; and discover solutions and practices that have proven effective. The project engaged two primary stakeholder groups:

- **Developers**, including private sector applicants and development teams advancing all housing types through the review process.
- **Development Reviewers**, including public sector staff and officials responsible for reviewing, permitting, inspecting, and approving residential development across planning, building, public works, and special districts.

Exhibit 2. Overview of Engagement Activities



Source: ECONorthwest, 2026

Engagement activities included an introductory webinar attended by 153 people, seven focus groups reaching a total of 81 people, two surveys reaching 127 people, and 36 interviews conducted as part of the case study research, as shown in [Exhibit 2](#). Questions for development reviewers focused on common barriers and best practices in each development phase and factors impacting review timelines at the local level. Questions for developers focused on common barriers and the solutions they found most helpful. In each engagement, the project team collected respondent characteristics to allow findings to be grouped by development phase, housing type, and location. Findings are incorporated throughout this report. See **Appendices C, D, and E** for the full engagement summary, focus group findings, and survey results.

Background Research and Literature Review

The project team conducted a review of published research and literature documenting process-related barriers to residential development in Oregon and nationally. This included state and local government reports, academic studies, housing advocacy publications, industry research, and prior barrier assessments. For example, the review drew on the Oregon Housing Production Advisory Council (HPAC)'s 2024 Final Report, which identified 59 recommendations to increase housing production across the state, including specific recommendations related to streamlining land use, public works, and building permit review processes. Additionally, the review drew on national research from sources such as the Turner Center for Housing Innovation that examined how permitting timelines and costs vary across jurisdictions and housing types. The review examined how barriers manifest across different development phases, housing types, and jurisdiction sizes, and helped bring to the surface best practices and promising approaches that have been implemented in Oregon and other states. See **Appendix B** for a full summary of the background research and literature review.

Development Case Studies

The project team conducted case study research on eight real-world residential development projects across Oregon, representing a range of housing types, development contexts, review processes, and jurisdiction sizes. The projects encompass a range of development review experiences, including both smoother and more challenging processes, to highlight factors that can create or exacerbate barriers as well as those that support positive outcomes. Each case study included interviews with the development team and public sector staff involved with reviewing the project to capture perspectives from both sides of the process. Interviewees were also invited to fact-check draft case study summaries prior to publication. Key findings are incorporated throughout this study; see **Appendix F** for the full case study narratives.

Permitting Timeline Analysis

The project team collected and analyzed land use, building, and public works permit data from 2020–2025 spanning a total of 29 jurisdictions across Oregon:

- Seven jurisdictions provided building permit records from state e-permitting software reports
- Nine jurisdictions provided building permit records from local permitting software
- Six jurisdictions provided land use permit data

- Six jurisdictions provided public works permit records
- AKS gathered dates from subdivision application files for projects in eleven small jurisdictions across the state

Building permit data is more readily available than other permit categories, and it is often easier for local governments to provide timeline details for building permits based on the way it is captured in e-permitting systems. Public works permit data was particularly challenging to analyze because it is not consistently linked to specific types of development.

The project team used the dates associated with each permit to analyze how long residential development projects usually take to move through key milestones in the review process and used the available project information to differentiate how that varies for different types of projects and permits. Findings are incorporated throughout this report; the full analysis, including details on permit distributions and collection methods is included as **Appendix G**.

Feasibility Impact Analysis

The Feasibility Impact Analysis examines how process delays and related costs affect the financial viability of residential development across three prototypical housing types that reflect common development patterns in Oregon. Using illustrative assumptions about project scale, costs, and market conditions, the analysis shows how increases in development review time and cost can affect financial returns. An overview of findings and outcomes from the analysis are provided in the [Feasibility Analysis](#) section of the report. The complete analysis, including the methodology, assumptions, and detailed results, is provided in **Appendix H**.

Overview of Residential Development Review and Permitting Processes

Residential development review serves several important public purposes. Together, these reviews help ensure that new housing is developed safely, that public infrastructure can reliably serve future residents, and that development is consistent with adopted community plans and regulations. They also help communities plan for long-term resilience by considering how new development interacts with transportation networks, utilities, stormwater systems, natural hazards, and other public infrastructure.

The complexity of residential development review varies substantially depending on project type, site conditions, and jurisdiction. Residential development in Oregon typically involves some combination of the following local review processes, though not all developments go through every process:

- **Land use approvals:** Review of whether a proposed development is consistent with adopted zoning, development regulations, and community planning goals. Depending on the project, this may involve staff review of clear and objective standards or a discretionary review by staff, a Planning Commission, or other review bodies.
- **Public improvements review:** Review, permitting, and inspection of public infrastructure, such as new roads, utilities, curbs, and sidewalks. These reviews help ensure that public systems are constructed to applicable standards and can reliably serve current and future development.
- **Building review:** Review, permitting, and inspection of buildings and associated private site improvements to help ensure structures are constructed safely and in accordance with applicable building codes and approved plans.

Illustrating the Development Review Process

This chapter includes development review graphics to visualize the complex process that residential developments follow from start to finish. These graphics are intended to be illustrative; they cannot capture the full nuance or range of conditions that individual sites and projects encounter. Instead, they demonstrate common processes and paths, focusing on key milestones in the development process.

These graphics use the same color schemes:

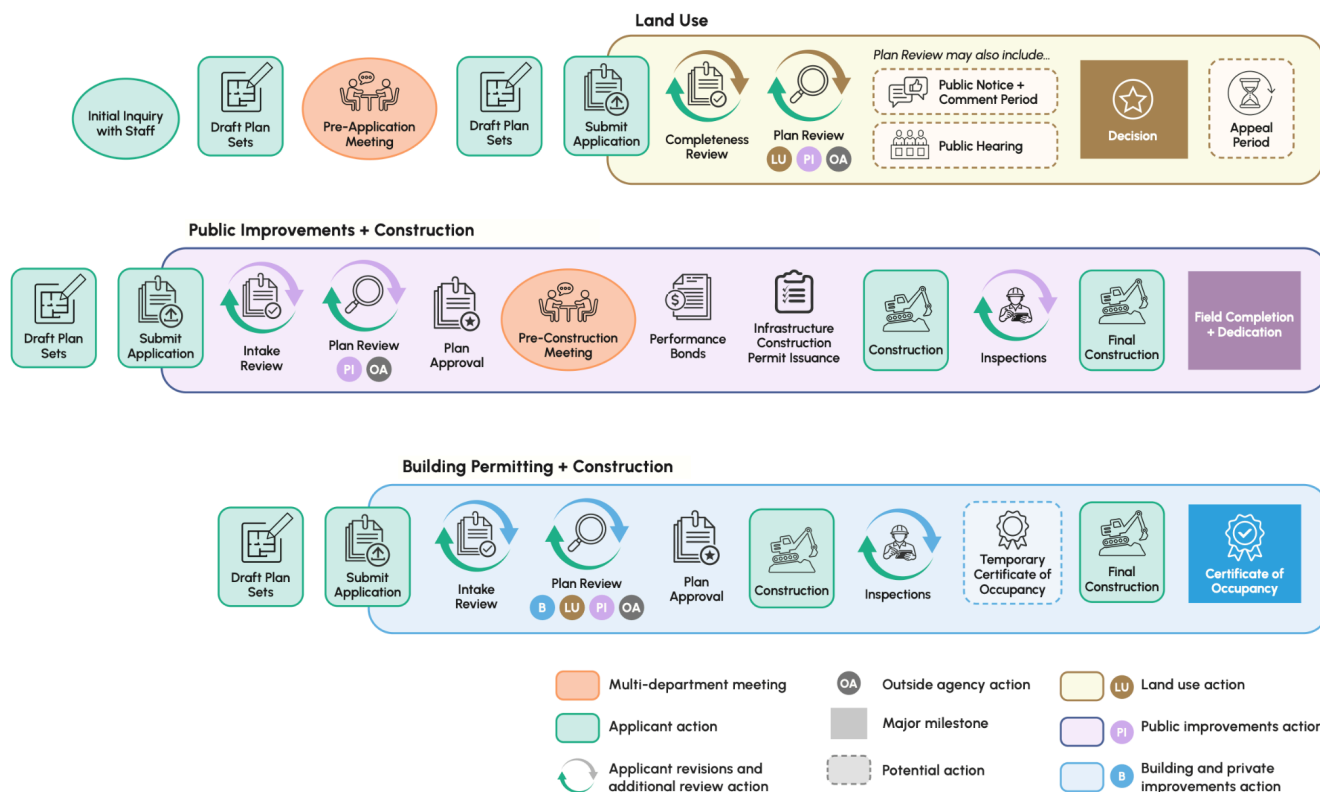
- **Yellow** indicates the land use phase;
- **Purple** indicates the public improvements phase; and
- **Blue** indicates the building phase.

These color schemes are repeated throughout the study. They also indicate when a specific step in the process may repeat or iterate between local government review/inspecting staff and the applicant. For illustrative examples of how common residential development types move through each phase of development on a project specific basis, see *Feasibility Analysis*.

Additional permits, such as site development permits for grading and erosion control, are also commonly needed and may occur alongside or between these phases. Where applicable, outside agency coordination, may occur concurrently with or prior to local permitting review, such as review by state and regional bodies like ODOT, DEQ, or utility service districts.

Exhibit 3 presents a simplified overview of the residential development review process commonly observed across Oregon communities. The graphic highlights the major phases of review associated with land use approvals, public infrastructure improvements, and building permitting and construction, identifying the key milestones that housing developments typically progress through on the path from concept planning to occupancy. The timing, sequence, and level of review for each phase will vary across jurisdictions and project types. A more detailed process graphic is presented in **Exhibit 4**.

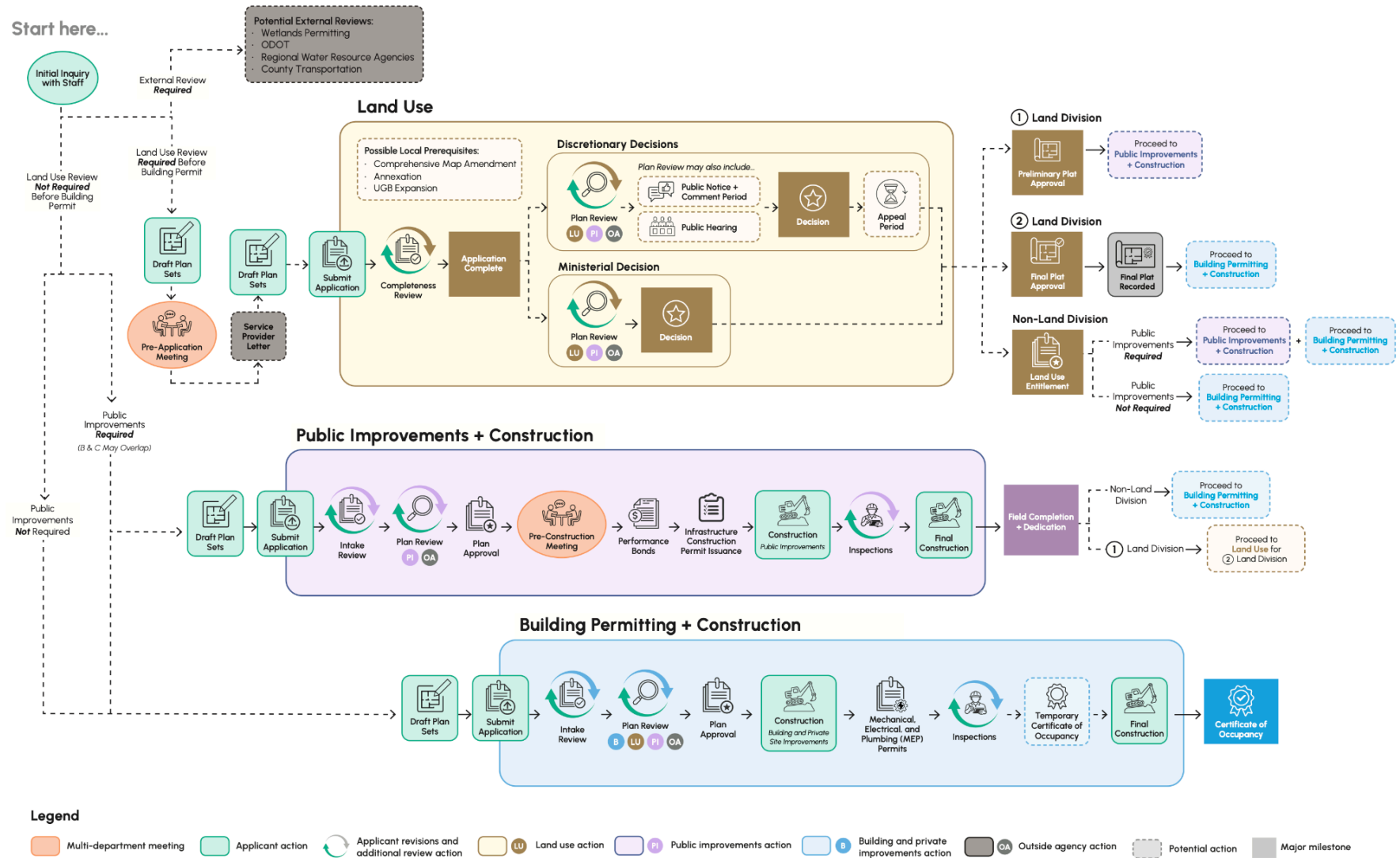
Exhibit 3. Illustrative Overview of Oregon's Local Development Review Process: Key Milestones



Source: ECONorthwest, 2026

Exhibit 4 presents a more detailed illustration of local residential development review processes that shows how the land use, public improvements, and building review processes are interconnected throughout the development process, from initial inquiry through final construction and occupancy. As shown in **Exhibit 4**, there is substantial variability in the sequencing and steps involved depending on the jurisdiction, site, and project.

Exhibit 4. Illustrative Overview of Oregon's Local Residential Development Review Process: Detailed



Source: EConorthwest, 2026

Local Processes that Cut Across Development Phases

Overview

Many barriers in the residential development process span across the land use, public improvement and building permit phases of development. Practices and barriers identified as “cross-cutting” include those that involve coordination across multiple departments, those that recur across phases, and those at the intersection of different phases.

Process Barriers

Key cross-cutting barriers that emerged from background research, the Project Team’s professional experience, focus groups, and survey input include:

- **Limited staff capacity and training, and frequent turnover** create additional challenges for applicants in navigating review processes and understanding requirements. In the development reviewer survey, respondents suggested that increasing staff capacity, training, and resources would assist in a smoother development process. Multiple city staff, including planning and building officials, and developers from the focus groups noted that limited staff capacity and frequent turnover is a major issue. Some noted that it can be difficult to hire a replacement when no one can train them and that training can be inconsistent.
- **Unclear submittal requirements or expectations** can result in multiple rounds of completeness comments and review, additional coordination, resubmittals, extended review timelines, and increased administrative workload. In the survey conducted for this project, 48% of developers across all housing types noted that unclear submittal requirements posed a frequent and major problem. In addition, both developers and regulators in the focus groups noted that unclear submittal requirements can delay projects and increase costs.
- **Conflicting standards** between different departments, agencies, and/or special districts can create uncertainty about requirements. This leads to delays and conflicting feedback regarding an application or design. Numerous focus group participants, including architects, engineers, and developers, felt that individual departments often review projects in silos and do not always coordinate with other departments. For example, the building and planning departments might give different guidance due to differing standards. Developers also brought up coordination issues between cities and special districts which can delay the process.
- **Incremental delays across review phases** accumulate and increase project costs even when individual delays are minor. Developers in the focus group noted that even small delays at each phase can add up to a substantial cumulative delay.

Emerging Best Practices and Recommendations

The following best practices and recommendations are applicable to the cross-cutting barriers.

- [Partnership Attitude from Jurisdiction Leadership](#): Establish clear expectations for review timelines, improve interdepartmental coordination, and foster a culture of problem-solving.
- [Detailed Submittal Checklists](#): Detailed checklists so that applicants can better understand requirements before submitting.
- [Early Assistance and Pre-Application Conferences](#): Early meetings to help ensure the applicant understands the requirements.
- [Provide Guidance to Applicants on Middle Housing Land Divisions](#): Lay out sequence of reviews and steps for middle housing land division.
- [Identify and Explain or Clarify Differences Between Land Use and Building Code Terminology](#): Avoid or more clearly explain differences in terminology to reduce confusion by applicants.
- [Provide Guidance on Review Process Manufactured, Modular, and Prefabricated Dwellings](#): Permitting guidance and educational resources regarding manufactured housing, modular construction, and prefabricated structures.
- [Transparent and Coordinated Permit Review](#): Allow applicants to see the status of review and provide consolidated and reconciled comments to applicants when reviews are complete, while allowing applicants to view comments incrementally as reviews are completed upon request.
- [Housing Development Project Coordinator](#): Point person or single point of contact for development review.
- [Structured Communication and Coordination with Outside Agencies](#): Establish clear lines of communication and coordination protocols with state agencies, special districts, and other entities.
- [Discipline-Specific Coordination Meetings](#): Proactive coordination **within** departments to resolve differences in interpretation.
- [Cross-Discipline/Department Coordination Meetings](#): Coordination **between** departments to reconcile conflicting requirements.
- [Engaging Contracted Reviewers](#): Coordinated communication **between** jurisdiction staff and third-party contracted reviewers.
- [Final Plat Sequencing](#): Allow concurrent rather than sequential review steps, such as assigning addresses and final review of construction documents.
- [Performance Bond and Substantial Completion for Public Improvements](#): Refine definition of substantial completion for public improvements for more consistent implementation of prior legislation to avoid delays for subdivisions.
- [Concurrent Land Use, Building, and Public Improvement Reviews for Non-Land Division Projects](#): Allow concurrent reviews across phases for non-land division projects at the applicant's risk.
- [Site Work Permitting Concurrent with Land Use Review](#): Allow applicants to submit permits for site work (e.g., grading and erosion control) concurrently with land use review.
- [Share Staff Capacity Across Small Jurisdictions](#): To address staff capacity challenges, adopt state-level or local agreements where jurisdictions can share review staff.

- [Simplify and Support Local Implementation of Housing-Related Legislation and Rulemaking.](#)
Consolidate legislative deadlines and provide technical support and guidance to cities.
- [Staff Training:](#) Training and retention efforts for local staff.
- [Standardize Development Review Data Collection and Performance Tracking:](#) Track and report on permit timelines, and make it easier for jurisdictions to use state permit systems for reporting.
- [Align Street and Access Standards Across Departments and with External Reviewers:](#)
Coordinate requirements to reduce conflicts and confusion.

Land Use Review

Legal Framework

Oregon's statewide land use planning program establishes the long-term framework that guides where and how communities grow. Through comprehensive planning, zoning, and coordination of infrastructure and public facilities, the program helps ensure that land is available and ready for housing while supporting complete communities with access to transportation, utilities, parks, schools, and other essential services. By establishing expectations for future development in advance, the land use planning framework provides greater certainty for local governments, residents, and the development community as projects move into the development review process.

Oregon's land use approval framework for housing is shaped in part by state requirements for clear and objective housing standards. Oregon Revised Statute (ORS) 197A.400 requires local governments to adopt and apply **clear and objective standards**, conditions, and procedures regulating housing development. Jurisdictions may also maintain discretionary review pathways in certain circumstances, such as historic resource review or where the applicant is seeking flexibility or development incentives.

State law (ORS 227.178 and ORS 215.427) also establishes procedural requirements and timelines for local land use review, sometimes called "shot clock" requirements. Jurisdictions must conduct a **completeness review within 30 days** to determine whether an application includes all required materials. For residential development applications within an urban growth boundary (UGB), jurisdictions must issue a **final land use decision within 120 days** after deeming the application complete. Additional expedited timelines apply in certain circumstances: ORS 227.178 (1) establishes **expedited review procedures for qualifying land divisions**, and requires certain cities and counties to issue **final decisions within 100 days for qualifying affordable multi-unit housing developments**.

Recent legislation

In recent years, Oregon has adopted several pieces of legislation intended to remove process barriers in residential development review for land use, such as:

- **SB 1537** (2024) requires local governments to grant adjustments to specific development and design standards for qualifying development (effective January 1, 2025). The mandatory adjustment requirements sunset on January 2, 2032.
- **HB 4063** (2024) allows applicants with a pending housing development application to elect review under amended local land use regulations adopted after application submittal. The bill also revises provisions related to middle housing land divisions (effective June 6, 2024).
- **SB 974** (2025) prohibits public hearings for certain discretionary residential development applications, including zone changes, variances, and planned unit developments, except on appeal (effective July 1, 2026). It also prohibits application of design standards for certain residential development (sunsets January 2, 2033).

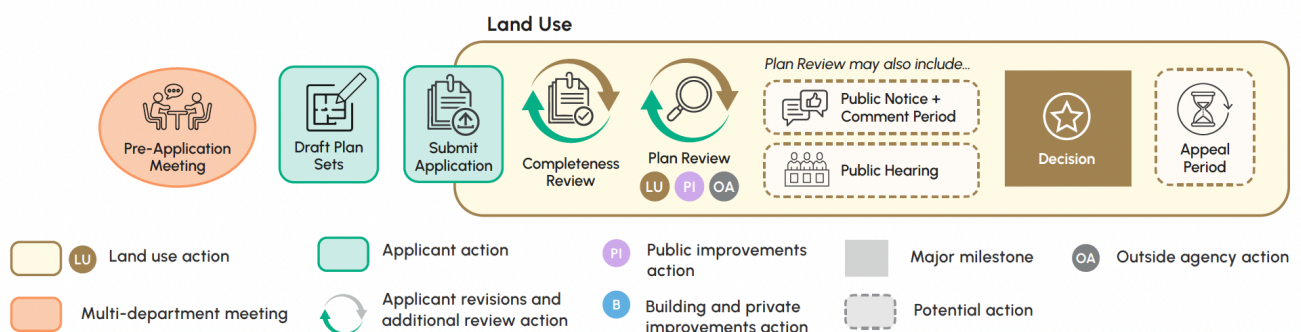
- **HB 2138** (2025) broadens allowance of middle housing (effective 2027, 2028), revises expedited land division review procedures, limits traffic impact analyses, requires clear and objective tree removal codes, and allows concurrent processing of a middle housing land division with a standard land division.
- **HB 4037** (2026) limits notification and prevents hearings for residential development subject to clear and objective standards (effective July 1, 2026).

However, since implementation can take time, barriers addressed by these bills may still have affected current or recently completed development projects. This study generally does not include recommendations in areas where recent legislation has already established new direction or requirements, instead focusing on barriers and opportunities that may still warrant additional consideration.

Overview of Residential Land Use Review Processes in Oregon

The first phase of residential development typically begins with land use review to determine whether a proposed project is allowed and consistent with local zoning codes and other applicable local and state regulations. Depending on the project type, scale, site constraints, and jurisdiction, land use review can range from a straightforward ministerial approval to a more involved discretionary review.

Exhibit 5. Overview of the Land Use Review Process



Source: EConorthwest, 2026

As shown in Exhibit 5 the land use process generally follows these steps:

1. **Pre-application conference** (*applicable to some application types*), where the applicant meets with planning staff, and sometimes other departments, to discuss the project, identify applicable standards, and understand submittal requirements before a formal application is filed.
2. **Completeness review**, where staff determines whether the application includes all required materials before substantive content review begins.
3. **Staff review**, including coordination with other city or county departments and outside agencies, such as special districts, fire, or state agencies, to evaluate the application against applicable criteria.

4. **Hearings** (*applicable to some application types*), which are required for some land use reviews, particularly for discretionary approvals, where a planning commission or hearings officer takes public testimony and evaluates the application.
5. **Decision**, where the reviewing authority issues a written determination approving, approving with conditions, or denying the application.
6. **Appeal period** (*applicable to some application types*), which follows some decisions and provides an opportunity for the applicant or other related parties to challenge the decision before a higher authority.

Land Use Applications + Review Types

Residential development in Oregon can require many different types of land use applications and reviews depending on the project, site, and jurisdiction. While terminology varies across jurisdictions, land use reviews are commonly categorized on a scale from Type I through Type IV, reflecting the level of discretion involved in the decision-making process. Common land use applications that residential development may require are summarized below by review type. Some applications may require a different review procedure depending on local code requirements. Note that recent legislation summarized above has changed the required review procedures for many of these applications. Example applications are listed under the type that best reflects the level of discretion allowed following implementation of this legislation.

Type I (Ministerial)

Decisions made by staff applying clear and objective standards that require no discretion, public notice, or public hearing. Permit types may include:

- **Development Review / Zone Check:** Evaluates a development proposal for zoning and development standard compliance prior to building permit issuance.
- **Minor Adjustments:** Allows limited flexibility from specific zoning standards to address site-specific constraints when based on clear and objective standards and criteria.
- **Final Plat Review:** Verifies that a subdivision or partition plat conforms to the approved tentative plan and applicable technical requirements.

Type II (Administrative)

Decisions made by staff applying limited discretion, may require public notice and may require an opportunity to appeal. The typical Type II process is established in statute at ORS 197.195 (limited land use decisions) and ORS 227.175 and ORS 215.416 (decision without hearing for cities and counties, respectively).

- **Land Divisions:** Land division splits property into individually saleable and buildable lots.

- **Middle Housing Land Divisions (MHL D):** MHL Ds allow middle housing units and lots to be subdivided and individually owned.³
- **Design Review + Historic Review:** Evaluates building form, materials, and aesthetics for consistency with community design or historic preservation standards. *(May be Type III in some situations.)*
- **Natural Resource + Natural Hazard Review:** Addresses development limitations in or adjacent to protected areas such as wetlands, floodplains, and riparian corridors. *(May be Type III in some situations.)*
- **Planned Developments:** Allows flexibility in lot sizes, housing types, and site layout on larger sites, typically in exchange for public benefits such as open space.⁴
- **Variances:** Provide relief from specific development standards in response to site-specific circumstances and constraints, such as property shape or topography.
- **Residential Up-Zoning:** A change of zoning from one residential zone to another that would allow denser residential development.

Type III (Quasi-Judicial)

Decisions that involve greater discretion, requiring a public hearing by a hearings officer or planning commission and formal findings. The quasi-judicial process is established in statute at ORS 197.797. Permit types may include:

- **Site-Specific Comprehensive Plan + Zoning Map Amendments:** Changes a property's land use or zoning designation through discretionary review.
- **Conditional Use Permits:** Authorizes uses that require discretionary review to evaluate site-specific impacts and ensure compatibility with surrounding properties and the applicable zoning district regulations and comprehensive plan policies.

Type IV (Legislative)

Decisions made by elected officials on broad policy matters that carry the highest level of discretion and public engagement. Type IV decisions are generally not property-specific, but can include broader comprehensive plan and zoning map amendments, for example, to implement an area plan.

Annexation + Annexation-Related Processes, which Incorporate property into city limits to access urban services under an agreed-upon timeline and cost structure, are not legally considered land use decisions and are subject to their own procedures.

³ If the MHL D is processed as an Expedited Land division under 197A.140, notice and appeal rights are only to the applicant, unlike most other Type II land use applications.

⁴ While previously these were typically Type III decisions, SB 974 precludes public hearings for residential planned developments.

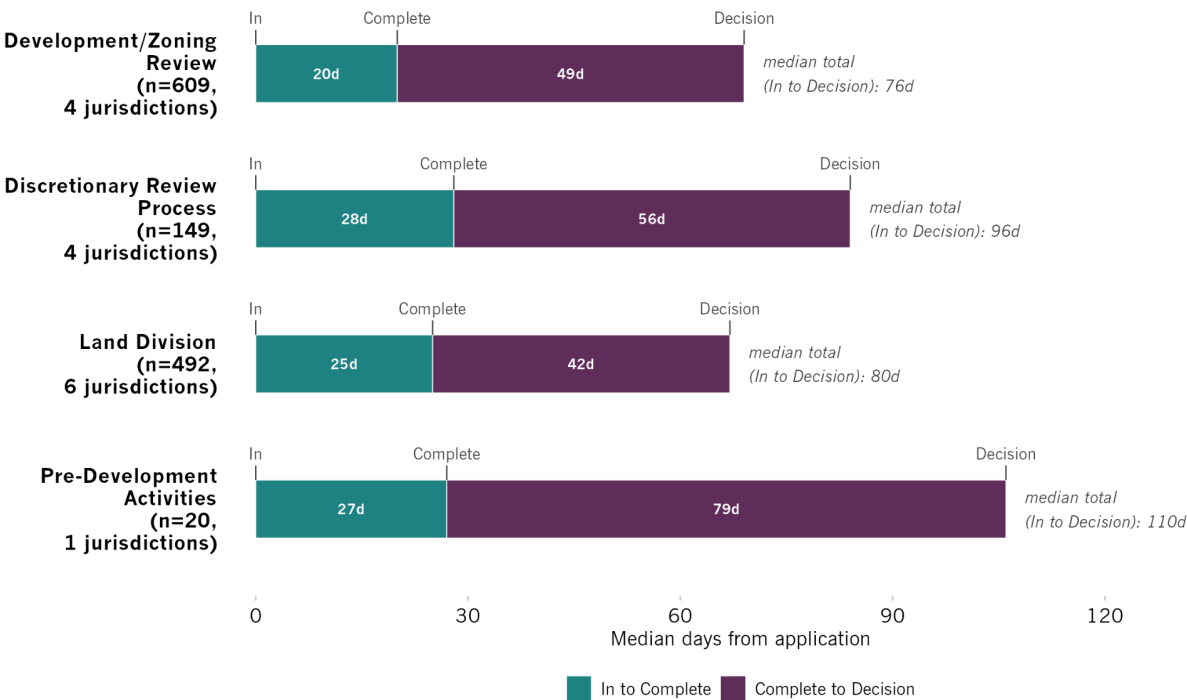
Observed Land Use Permitting Timelines

The study conducted a permitting analysis using permitting data for land use, public works, and building permits provided by jurisdictions across Oregon to analyze how long residential development projects actually take to move through key milestones in the review process. Land use permits were filtered to include only those related to new residential development, specifically zoning review, discretionary review(s), land division(s), and predevelopment activities. Jurisdictions track and code permit data differently across their respective permitting systems; as part of the analysis, permit attributes were reviewed and harmonized across jurisdictions to ensure consistent representation of key milestones. Dates were standardized into three milestones:

- **"In"** (date submitted)
- **"Complete"** (date application deemed complete)
- **"Decision"** (date of final approval from staff)

Exhibit 6 shows the median number of days between "In" to "Complete" and between "Complete" to "Decision" for each land use permit subtype. The overall median or "median total" shown at the end of each bar reflects the median of total time from "In" to "Decision" and does not sum to the individual permit subtype medians. Note that the permit data reflects permit activity prior to implementation of many of the recent bills aimed at streamlining land use processes.

Exhibit 6. Land Use Permit Review Timeline by Subtype, 2020-2025



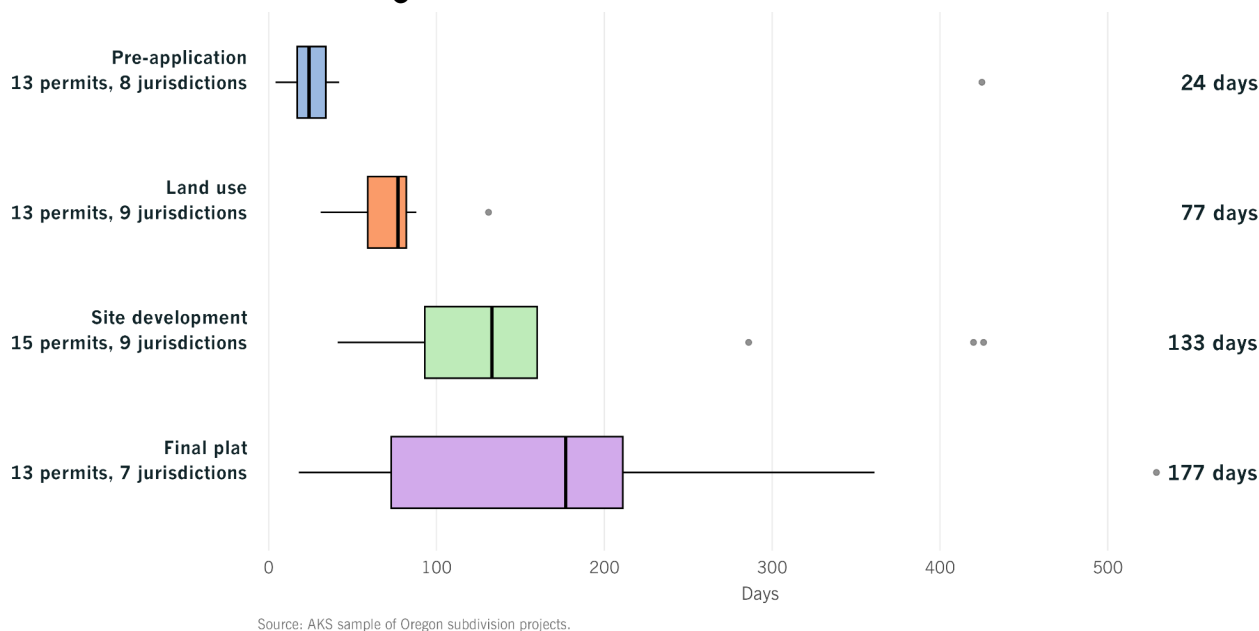
Source: *ECONorthwest* (2026) analysis of land use permit data from six Oregon jurisdictions, 2020-2025

Note: 'Predevelopment Activities' include Zone Changes and Annexation.

AKS Engineering & Forestry LLC provided supplemental permit data focused specifically on subdivision project phase timelines, drawn from application files across 11 small jurisdictions in Oregon. Unlike the land use permit subtype data shown in **Exhibit 7**, this data captures timelines for discrete phases within the subdivision development process, offering a more granular view of the time per review component.

Exhibit 7 below shows the distribution of days for each subdivision phase, with the overall median for each phase highlighted at the end of each row.

Exhibit 7. Subdivision Permitting Phase Distributions, 2016-2026



Source: *ECONorthwest analysis (2026) of data provided by AKS Forestry and Engineering LLC from 22 subdivision project applications in eleven small Oregon jurisdictions.*

Process Barriers for Land Use

Key barriers that emerged from background research, Project Team professional experience, focus groups, and survey input include:

- **Highly-detailed or prescriptive clear and objective standards.** Demonstrating compliance with highly-detailed standards can be costly and time consuming for the applicant and may require multiple revisions. Detailed standards may apply at a range of scales, from design of individual buildings to housing mix within a broader new master-planned area. Even small deviations from the standards may trigger a discretionary review process. 53% of developers represented in the housing producer survey reported detailed standards requiring more time and cost were occasionally or frequently a major issue.
- **Overlapping layers of standards** can make it more difficult for applicants to know what will be required of them and put more pressure on staff guidance through pre-application conferences or informational meetings. 78% of developers represented in the housing producer survey reported that multiple layers of regulations were occasionally or frequently a major issue.

- **Discretionary reviews with public hearings or appeal risks.** Where still allowed, public hearings increase time, uncertainty, and potential for opposition and appeals. Even without hearings, required public notice and appeal opportunities create uncertainty due to risk of opposition. 57% of developers represented in the housing producer survey reported hearings or appeal risk were occasionally or frequently a major issue.
- **Complexity in land divisions.** Combining middle housing land divisions with standard subdivisions can create complexity, since middle housing land divisions apply to individual parent parcels being created through the subdivision process. Recent changes to state law allow these applications to be processed concurrently; however, coordinating the requirements and sequencing of the two processes can be challenging.
- **Local natural resource and natural hazard reviews.** Where required, these reviews may require special reports or permitting through outside agencies or districts with different timelines and submittal requirements. 58% of developers represented in the housing producer survey reported that wetlands, resource area, and natural hazard reviews were occasionally or frequently a major issue.
- **Uncertainty in state housing law.** The scope and frequency of changes to state housing law creates challenges for project review. Keeping codes up to date and staff trained is difficult for resource-constrained jurisdictions. 64% of reviewers represented in the development reviewer survey reported that rapidly changing state requirements was occasionally or frequently a major issue.

Emerging Best Practices and Recommendations

The following best practices and recommendations are applicable to this phase of development.

- **Identify and Explain or Clarify Differences Between Land Use and Building Code Terminology:** Avoid or more clearly explain differences in terminology to reduce confusion by applicants.
- **Site Work Permitting Concurrent with Land Use Review:** Allow applicants to submit permits for site work (e.g., grading and erosion control) concurrently with land use review.
- **Simplify and Support Local Implementation of Housing-Related Legislation and Rulemaking.** Consolidate legislative deadlines and provide technical support and guidance to cities.
- **Simplify Clear & Objective Zoning Regulations:** Evaluate and refine clear and objective standards to reduce the level of detail or provide a wider range of options.
- **Opportunities to Modernize Final Plat Requirements:** Reduce delays associated with final plat processing by modernizing review, routing, and approval procedures.
- **Opportunities to Standardize Final Plat Requirements:** Improve predictability and consistency in final plat submittal and approval processes across jurisdictions within a county or region.
- **Remove Local Procedural Requirements to have Final Plat Approval via City Council:** Remove local requirements that city councils approve final plats.
- **Utilize Model Code Resources from the State Where Possible:** Reduce standards variability and review processes for the same type of development in different jurisdictions.
- **Remove Neighborhood Meeting Requirements:** Remove neighborhood meeting requirements for residential land use applications.

- [Streamline Land Use Review for an Allowed Use on a Lawfully Established Lot](#): Allow development to proceed as a building permit review or offer concurrent land use and building permit review.
- [Use a Hearings Examiner for Appeals](#): For local land use appeals, rely on a hearings officer rather than the Planning Commission to reduce the influence of local opinion.
- [Align Street and Access Standards Across Departments and with External Reviewers](#): Coordinate requirements to reduce conflicts and confusion.

Public Improvements Plan Review and Permitting Processes

Legal Framework and Recent Legislation

Historically, Oregon statutes have governed aspects of public improvements through agency-specific regulatory requirements, such as Oregon Health Authority permitting of public water system extensions and Department of Environmental Quality requirements for wastewater facilities. However, unlike land use and building review, the local public improvements plan review process itself has not historically had singular agency oversight, nor centralized statutory regulation. Instead, review procedures have been established through local engineering standards and practices, together with applicable requirements of local, state, federal, and special district reviewing agencies. There is a relatively recent state law that relates to the review process for public improvements associated with residential development. **SB 974** (2025) establishes timelines for some public works reviews similar to those required for land use applications, including a 30-day deadline for completeness review and a 120-day deadline for reviewing final engineering plans.

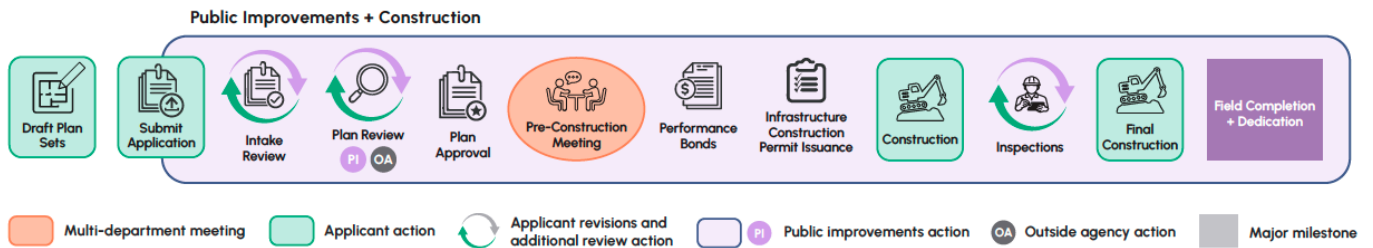
Other legal requirements for public improvements associated with development stem from the Fifth Amendment to the United States (U.S.) Constitution (the Takings Clause) and U.S. Supreme Court case law. Together, these establish limits on exactions (required improvements, dedication of land, or fees) that can be required as a condition of development. The key tests are referred to as “Nollan” and “Dolan” and require that exactions have a “nexus,” or a clear relationship to the impacts of the development, and be roughly proportional to the magnitude of those impacts. Determining what exactions will be required of a development within this legalistic framework adds time and uncertainty to the permitting process.

Overview of Public Improvement Plan Review and Permitting Processes in Oregon

The public improvements review and permitting process governs the design, approval, and construction of infrastructure associated with residential development, including streets, utilities, stormwater facilities, and other improvements that serve or connect to the public realm. This process typically follows land use approval and may occur concurrently with or prior to building permit review depending on the project type and jurisdiction.

Public improvements review often involves multiple reviewing entities, including local departments, utilities, special districts, road authorities, and state or federal agencies, depending on the project. Many of these reviews occur concurrently by separate reviewers rather than in sequence. As a result, the complexity and sequence of steps vary by project scope, jurisdiction, and the nature of required improvements. Additional information about reviews conducted by outside agencies is provided in the [External Processes](#) section.

Exhibit 8. Overview of the Public Improvements Review Process



Source: ECOnorthwest, 2026

As shown in Exhibit 8, the public improvements process generally follows these steps:

1. **Intake review**, (required by some jurisdictions, optional in others), where staff evaluate whether submitted construction permit materials meet local intake requirements before the application is formally accepted for review.
2. **Plan review**, where engineering staff and applicable reviewing entities, which may include public works, special service districts, utility providers, and transportation agencies, evaluate construction plans for compliance with applicable engineering and infrastructure standards.
3. **Plan approval**, where staff issue written approval of construction plans, often accompanied by conditions that must be met prior to or during construction.
4. **Preconstruction meetings**, where the applicant, design team, and jurisdiction staff align on construction expectations, sequencing, and applicable requirements before work begins.
5. **Performance bonds**, which are typically required before permit issuance to provide financial assurance that required infrastructure improvements will be completed.
6. **Infrastructure construction permit issuance**, where permits are formally issued and construction of required infrastructure improvements may begin.
7. **Inspections**, where jurisdiction staff conduct field inspections during construction to verify that work is being completed in accordance with approved plans and applicable standards.
8. **Field completion and dedication**, where infrastructure improvements are finalized, punch list items are resolved, maintenance bonds are secured as applicable, as-built plans are submitted and approved, and improvements are formally accepted and dedicated to the public.

Types of Public Improvement and Public Works Applications + Reviews

Residential development in Oregon often requires permits and approvals for public improvements and site development, covering privately engineered public infrastructure as well as privately owned and maintained infrastructure that serves or connects to facilities in the public right-of-way. These reviews are sometimes referred to as public works permitting, site development permitting, or construction permitting depending on the jurisdiction. They are generally consistent in their oversight by a municipal engineer and/or public works director who manages compliance with municipal standards; however,

there is some variability in which department reviews certain permit types, such as grading and site development permits. Individual permit types may go by different names across Oregon communities. The types of permits required and the processes for obtaining them vary across jurisdictions. Summarized below are common types of public improvement permits that residential development may require, organized by review type.

Public Improvement Permits

These permits require submission and review of engineering plans prepared and stamped by private sector engineers demonstrating compliance with applicable municipally-adopted design and construction standards for **improvements that will be dedicated as public improvements**. This can include new or improved streets, utilities, stormwater, and sewer, as well as the earthwork/grading that is necessary to construct them. These permits typically involve multiple review cycles, coordination across departments or agencies within the jurisdiction, and formal plan approval before construction can begin. Terminology and scope vary by jurisdiction.

Grading and Erosion Control Permits

Grading and Fill Permits review plans for earthwork and site grading. **Erosion Control Permits** review plans for managing stormwater runoff and erosion during construction. Some jurisdictions issue grading and erosion control as separate permits; others combine them.

Private Site Development Permits

These permits require submission and public review of final engineering plan sets and other related construction documents that are typically prepared by private sector engineers. They are necessary to demonstrate compliance with local design and construction standards for improvements that will be privately owned and maintained, such as parking areas, stormwater infrastructure, landscaping, etc. Most typically, these are associated with multi-dwelling development. These permits typically involve multiple review cycles, coordination across departments or agencies within the jurisdiction, and formal plan approval before construction can begin.

Other Public Works Permits

These permits authorize specific, defined work within the public right-of-way or on public infrastructure. They generally require less extensive documentation and involve a more streamlined review to verify that proposed work meets applicable standards before proceeding. These differ from Public Improvement Permits in that Public Improvement Permits are for infrastructure designed specific to a site and development, while these permits involve improvements built according to pre-designed public works standard drawings.

- **Right-of-Way (ROW) Permits:** Authorizes work within the public right-of-way, such as sidewalk repairs, driveway approaches, utility installations, or pavement cuts. Some jurisdictions tier these by complexity and scope.
- **Utility Connection Permits:** Authorizes connection of private development to public water, sewer, or stormwater systems, including meter installations and lateral connections.

- **Driveway and Sidewalk Approach Permits:** Required for installation or modification of driveway approaches or sidewalk connections to the public right-of-way.

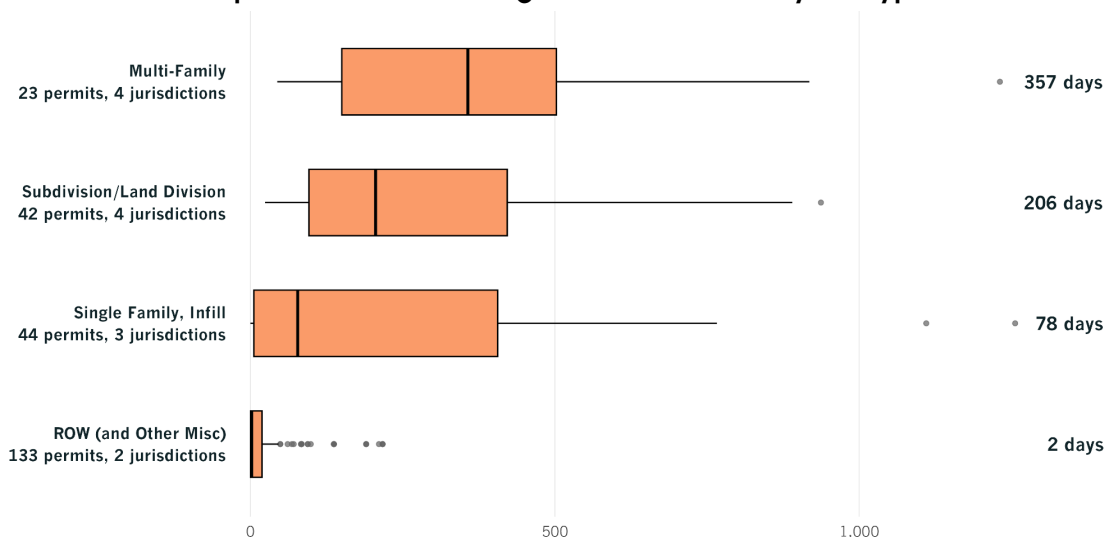
Observed Permitting Timelines for Public Improvements

The study conducted an analysis of data for land use, public works, and building permits from jurisdictions across Oregon to analyze how long residential development projects actually take to move through key milestones in the review process. Public works permits were often not clearly linked to a specific land use or housing type, making it challenging to identify permits associated with residential development. However, to the extent possible, the analysis filtered permits for public improvements to those associated with new housing based on the available information. Permits were grouped into the four subtypes listed below based on descriptions or other information in the permit data. This grouping is imprecise given the lack of clear and consistent information in the available data regarding the type and scale of associated residential development. See **Appendix G** for additional details regarding the classification of this data.

- **Multi-Family:** Public improvements for duplexes and developments with more than two units.
- **Subdivision / Land Division:** Partition, Subdivision, and Planned Unit Development.
- **Single-Family, Infill:** Single family residences (not involving land division)
- **ROW, other miscellaneous:** Right-of-ways, sanitary, and new private stormwater;

The way that jurisdictions categorize public works permits varies greatly, and these permits are typically logged independently from the residential permitting processes. As a result, few jurisdictions were able to provide data that explicitly linked public works permits to new residential development. The data required substantial manual review and re-coding to identify residential-related permits, and estimates reflect the quality of data received. **Exhibit 9** shows public improvements permitting review timelines by subtype.

Exhibit 9. Public Improvements Permitting Review Timelines by Subtype, 2020-2025



Source: ECONorthwest analysis (2026) of public works data from **six** Oregon jurisdictions, 2020-2025

Process Barriers for Public Improvements

Key barriers that emerged from background research, Project Team professional experience, focus groups, and survey input include:

- **Difficulty anticipating required public improvements.** Applicants may not know the full extent of required public improvements until the pre-application conference, or later states of review. While this information sometimes becomes available only after significant investment in site acquisition and design, prospective buyers may also seek to identify and evaluate these requirements before acquiring a property to inform purchase decisions and project feasibility. Unexpected infrastructure requirements can substantially impact project financial feasibility. In the survey conducted for the study, 58% of developers represented in the housing producer survey reported determining required infrastructure improvements was occasionally or frequently a major issue.
- **Variation in proportionality and exaction requirements.** There is no universally accepted method of assessing proportionality, resulting in variation among jurisdictions and discretion in determining how exactions should apply in typical or specific cases.
- **Coordination challenges among reviewing agencies and service providers.** Coordination among service providers and reviewing agencies can extend project timelines. Few Oregon communities provide all of their own utilities, which guarantees referral review for most projects based on legacy or specific operating agreements of varying specificity. Overlapping or conflicting standards between agencies, such as fire, transportation, or utility providers, can require iterative revisions and costly redesign.
- **Unclear or conflicting design standards.** Identifying all applicable facility design requirements can be a challenge for applicants, especially if engineering design manuals or standard specifications are not available online or if there are discrepancies between standards listed in development code and those listed in other documents. 52% of developers and 64% of reviewers surveyed reported that a lack of clarity on facility design requirements by applicants was occasionally or frequently a major issue.
- **Late-stage review comments and redesign.** Items missed or not identified during earlier review cycles may be raised in later reviews of building and public improvements review, despite little or no change to submitted plans, creating a domino effect that requires redesign, resubmittals, and additional review time. Multiple developers in the focus group also brought up the issue of incomplete reviews, with one noting that they had received 200 new comments on the second round of review on their public works permit that was supposedly about 90% complete. Focus group participants described inspectors questioning approvals issued by plan reviewers, and in some cases, issues surfacing at the final stages of review, effectively restarting portions of the review process. As one focus group participant described it, "The experience feels like working in quicksand: A project never feels truly complete until it is entirely finished."
- **Delays related to facility acceptance and occupancy.** Certificates of Occupancy (C of O) are not issued until public facilities are substantially complete (with bonding) or facilities are accepted. Variation in what jurisdictions consider "substantially complete" can lead to differences in whether small items hold up the C of O or not.

Emerging Best Practices and Recommendations

The following best practices and recommendations are applicable to this phase of development.

- [Availability of Existing Infrastructure and As-Built Information](#): Provide as-built information to applicants during pre-application conferences or early assistance.
- [Clarify Requirements Related to Early Site Work](#): Provide guidance on permits for early site work (e.g. grading, clearing, erosion control).
- [Performance Bond and Substantial Completion for Public Improvements](#): Refine definition of substantial completion for public improvements for more consistent implementation of prior legislation to avoid delays for subdivisions.
- [Site Work Permitting Concurrent with Land Use Review](#): Allow applicants to submit permits for site work (e.g., grading and erosion control) concurrently with land use review.
- [Reform Exactions for Transportation Improvements](#): Reduce exactions and negotiation over required public improvements for transportation.
- [Proactive Infrastructure Planning by Jurisdictions and Special Districts](#): Evaluate needed improvements and funding mechanisms in advance to reduce burden on individual developments.
- [Align Street and Access Standards Across Departments and with External Reviewers](#): Coordinate requirements to reduce conflicts and confusion.
- [Update Public Works Design Standards Related to Middle Housing](#) to reflect recent changes in housing laws and support middle housing development.
- [Cite Relevant Public Works Designs Standards](#) when providing comments to applicants.
- [Allow Flexibility on Timing of Minor Public Works Improvements](#): Allow applicants to decide timing of improvements like sidewalk construction with subdivision or with construction of units.
- [Allow Licensed Engineers to Self-Certify Public Improvement Plans](#) for simple public improvements, such as sidewalk infill.

Building Review and Inspections Processes

Legal Framework

In Oregon, the state building code is administered and enforced by the Oregon state Building Codes Division (BCD) under state statute. The state building code is uniform across the state and includes the **Oregon Structural Specialty Code (OSSC) and the Oregon Residential Specialty Code (ORSC)** along with several specialty codes related to energy efficiency, mechanical, electrical, plumbing, and manufactured dwelling installation. Specialty Codes are adopted by BCD through Governor-appointed, Senate-confirmed, Advisory Boards. Any code amendment or provision requires approval from both the advisory board and BCD. While the state establishes the uniform codes, local governments can apply to the state to administer and enforce specialty codes. **Across Oregon, 130 municipalities administer the state code through municipal building inspection programs.** Cities are prohibited from adopting or administering building code standards without permission from the state. Cities are permitted to adopt ordinances in some special cases, including minimum health, sanitation and safety standards for governing the use of structures for housing and some aspects of appeals, fees, and enforcement mechanisms.

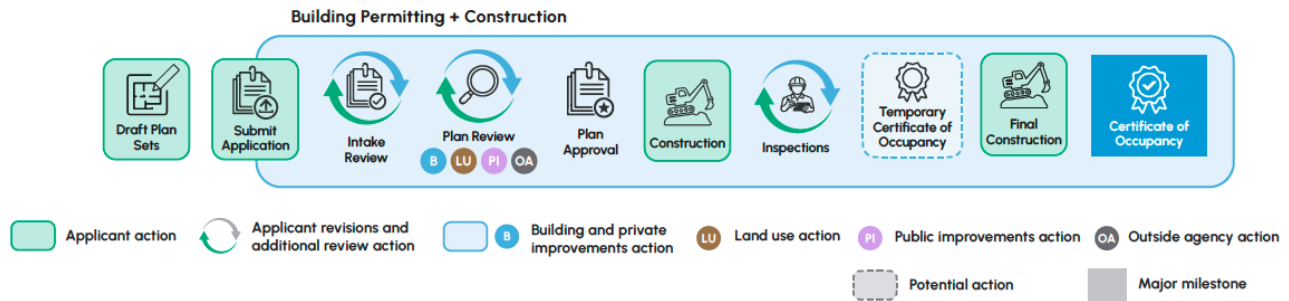
So-called “shot clock” provisions also apply to certain building permit applications. Under ORS 455.467, **cities must approve or disapprove a permit for “simple low-rise residential dwellings” within 10 business days for cities under 300,000 and within 15 business days for cities over 300,000.** The timelines do not apply if the plan requires federal, state or other local agency approval or for complex structures.⁵ This means any dwelling that is engineered and not prescriptive construction is not subject to the timeline requirement.

Overview of Building Review and Inspections Processes in Oregon

The building review and permitting process governs the design, approval, and construction of buildings associated with residential development, including the structure itself and some site elements such as accessory structures, tall retaining walls, screens, and tall fencing. In some jurisdictions the site development permit is a part of the building permit. This process typically follows land use approval (where required) and may occur concurrently with or prior to the public improvements review depending on the project type and jurisdiction. The complexity and sequence of steps vary by project scope, jurisdiction, and the nature of required improvements.

⁵ ORS 455.467; see also League of Oregon Cities. Oregon Municipal Handbook. Chapter 24: Building Regulations. https://www.orcities.org/application/files/7717/3585/7450/Handbook_-_Chapter_24_Building_Regulations.pdf

Exhibit 10. Overview of the Building and Inspections Review Process



Source: ECOnorthwest, 2026

As shown in **Exhibit 10**, the building review process generally follows these steps:

1. **Intake review**, where staff evaluate whether submitted building permit materials meet local intake requirements before the application is formally accepted and routed for review.
2. **Plan review**, where building review staff and/or building officials and other applicable reviewing staff which may include planning, fire, and mechanical, electrical, and plumbing reviewers, evaluate construction documents for compliance with applicable building and development codes.
3. **Plan approval**, where staff issue a written approval of construction documents, often accompanied by conditions that must be met prior to or during construction.
4. **Construction**, where the applicant builds the structure and private site improvements in accordance with approved plans and applicable codes.
5. **Inspections**, where staff conduct field inspections at key stages of construction to verify that work is being completed in accordance with approved plans and applicable codes.
6. **Temporary Certificate of Occupancy** (issued in some cases), which allows limited occupancy of the building while remaining minor items that do not affect health or safety are resolved.
7. **Final construction**, where all remaining outstanding items are completed and the project is prepared for final inspection and close out.
8. **Certificate of Occupancy**, where the building official issues formal approval confirming that the structure meets all applicable requirements and is safe for occupancy.

Types of Applications and Permits

Residential building permits in Oregon can vary by jurisdiction, whether under the Oregon Residential Specialty Code (ORSC) or Oregon Structural Specialty Code (OSSC).

- The **ORSC** generally applies to one- and two-unit dwellings, including detached one-unit dwellings, attached and stacked two-unit dwellings, and townhouses⁶ up to three stories high. Definitions are based on the number of units in the structure, not the number of units on the lot,

⁶ Townhouse is defined in the ORSC as a building that contains three or more attached units that extend from foundation to roof with a yard or public way on at least two sides.

and can encompass several middle housing types (as they are defined for land use purposes), depending on how the units are configured and designed. The ORSC is a comprehensive code based on the International Residential Code (IRC) and the International Fire Code. It covers building, mechanical, and fuel gas systems, as well as standards addressing energy efficiency.

- The **OSSC** applies to larger structures, including all residential structures not covered by the ORSC—multiunit development with three or more units that do not meet the definitions for ORSC eligibility—and mixed-use development. The OSSC is based on the International Building Code, International Fire Code, and the International Existing Building Code and works in conjunction with several other codes, including Oregon Energy Efficiency Specialty Code (OEESC), Oregon Electrical Specialty Code (OESC), Oregon Mechanical Specialty Code (OMSC), Oregon Plumbing Specialty Code (OPSC), and Oregon Fire Code.

Building Permits

These permits require submission and review of complete plan sets demonstrating compliance with applicable code standards. They typically involve multiple review cycles and formal plan approval before construction can begin. Coordination across departments or agencies may be required depending on the jurisdiction and project complexity.

- **Structural Building Permit:** The core (structural) Building Permit includes reviews for compliance with the ORSC or OSSC and associated codes. This permit typically includes a zoning review (by land use planning staff), life safety review, and structural review. Site development may be included under a primary Building Permit or permitted separately, depending on the jurisdiction.
- **Electrical, Plumbing, Mechanical:** Some jurisdictions at owner's option for single family dwellings review these as part of a combined Building Permit while other jurisdictions require them to be wholly separate permits. Separate permits may either be applied for at the same time as the structural Building Permit or after structural permit construction has begun but before the electrical, plumbing, or mechanical work needs to start.
- **Fire Sprinkler and Alarms:** For projects that require a fire sprinkler system and/or monitored alarm system a separate permit review is typically required through the local fire jurisdiction. This may be identified in some jurisdictions as a Separate Permit acquired by a trade subcontractor.⁷ A brief description of the required system is included in the Building Permit.
- **Deferred Submittals:** With a deferred submittal, portion of the building design, typically including some engineering, is deferred for permit review during construction. This is typically done when a system requires vendor-specific or highly specialized engineering. Examples include aluminum storefront systems, floor trusses, roof trusses, equipment supports, solar photovoltaic systems. Deferred Submittals are outlined as part of the Building Permit but submitted after the Building Permit is issued, typically during construction, before the system is installed. What project elements are allowed to be deferred varies between jurisdictions and is dependent on the unique characteristics of the structure.

⁷ There is a BCD statutory requirement to allow local fire officials an opportunity to review plans and provide input; however, the local building official retains decision making authority.

- **Alternative Means and Methods (AMM):** Infrequently, a project may not meet a particular requirement of the code but the designer thinks they have come up with an equivalent alternative. In such cases an applicant can request an AMM. AMMs describe the code requirement not being met and how the proposed solution meets the intent of the code. AMMs are typically reviewed administratively and in some jurisdictions may be appealed by the applicant to a higher authority.

Observed Permitting Timelines for Building Reviews

The project team collected and analyzed building permit data from jurisdictions across Oregon to evaluate real-world permitting timelines. Building permits were filtered to include only those related to residential development, specifically new construction permits for one- and two-unit housing, townhomes, multifamily (a.k.a. multiunit), and manufactured housing.⁸ The project team obtained and analyzed data from two sources:

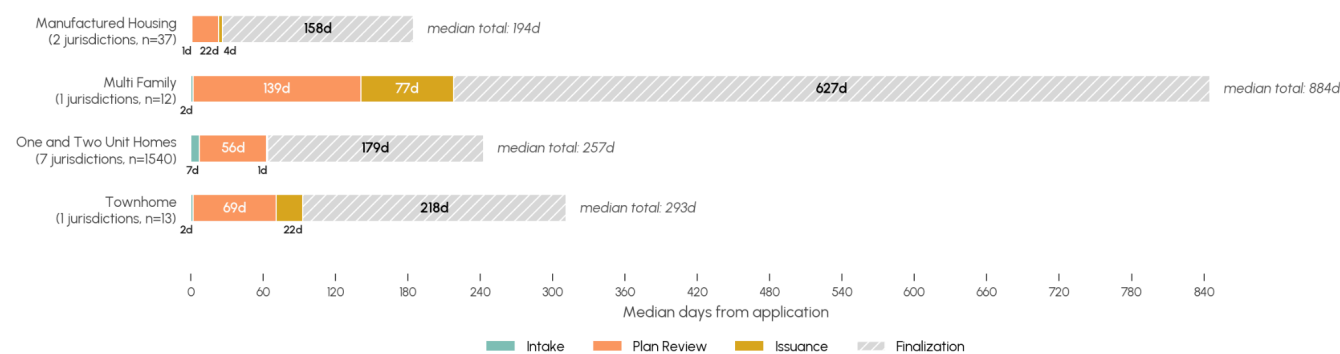
- **State e-permitting system (Accela):** Data offers relatively consistent use of status codes to track timing of key steps but was heavily concentrated in one- and two-unit residential development permits, with limited representation of other residential subtypes.
- **Local permitting systems:** Data had broader representation across all subtypes, but less consistent timing and status codes.

Exhibit 11 shows the median days per phase by permit subtype for Accela-based records, where timing data for each phase of building permit review was consistently available.

- **"Intake"** reflects time spent checking whether all required materials have been submitted such that the application is ready for detailed review and any time required on the applicant's side to update materials.
- **"Plan Review"** reflects the total time between when the application is routed for review and when all reviews have been completed. This can include multiple rounds of review by the jurisdiction and revisions by the applicant in some situations. The data does not consistently differentiate time spent in review vs. applicant revisions.
- **"Issuance"** includes time addressing final details on plan sets (e.g., required notations). The applicant also must generally pay permit fees and/or System Development Charges (SDCs) as applicable prior to permit issuance, which can sometimes lead to delays on the applicant's side.
- **"Finalization"** includes construction, inspections, and all other steps necessary to obtain a C of O. Much of this time is driven by the development's construction schedule, though scheduling of inspections can be a factor to some extent.

⁸ Note: The housing type categories used in this analysis align with those in building code definitions. This means that housing types such as triplexes and quadplexes may be included within multifamily or townhomes, depending on their design.

Exhibit 11. Median Building Permit Review Timeline by Housing Subtype (State Reports), 2020–2025



Source: ECOnorthwest analysis of local permit data from nine Oregon jurisdictions, 2020–2025.

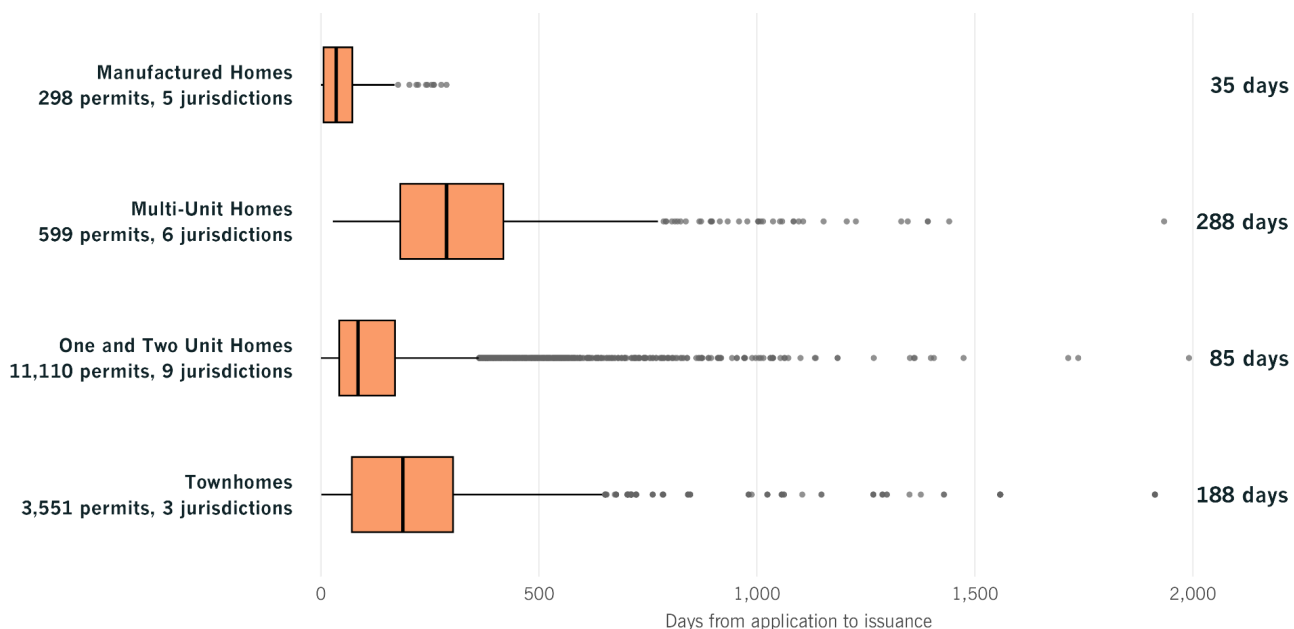
Note: Finalization includes construction. Days are measured as calendar days rather than business days.

This shows that the intake stage is generally less than a week, and often just a few days. The plan review stage is the longest review stage (excluding finalization). It varies by housing type, with multifamily permits taking longer than other housing types due to more complex code requirements and designs and the larger scale of the development associated with each permit.⁹ The issuance stage is highly variable, but typically longer for multifamily and townhouse permits (this is partly impacted by the small sample size). The overall timeline for multifamily permits is substantially longer than other housing types primarily because of the longer construction timelines for larger-scale development, which is captured in the “finalization” stage.

Exhibit 12 shows the distribution of days from application submittal to permit issuance for local-system building permit records. Because of the variability in how timing and status were coded for these records, only the total time from submittal to issuance (which includes the intake, plan review, and issuance stages described above) is consistently available across jurisdictions.

⁹ Note: In the Accela building permit data, only one jurisdiction is represented in the multi-family permit data. Given this small sample size, the results are not comprehensive for the entire Oregon geography.

Exhibit 12. Local Building Permit “In to Issuance” Timeline Distributions from Local Permit Data, 2020–2025



Source: EConorthwest analysis of local permit data from nine Oregon jurisdictions, 2020–2025

Note: Days listed on the far right of the chart for each subtype row reflect the overall median days from into issuance per housing permit subtype. Housing permit subtypes are based on building code definitions (summarized above), which do not necessarily align with land use definitions.

This shows that there is substantial variation in the time from submittal to issuance even within a single housing type. Multifamily typically takes longer than other housing types, but most one- and two-unit homes take longer than the 10 to 15 days specified in statute¹⁰ for simple dwellings under prescriptive ORSC application. (The statutory deadlines have limited applicability; the available data does not indicate which permits are subject to these timelines.)

Process Barriers for Building Reviews

Key barriers during the building plan review and permitting process that emerged from background research, the Project Team’s professional experience, focus groups, and survey input include:

- Variation in plan review expectations.** The level of detail jurisdictions expect for construction documents varies greatly. Some jurisdictions expect very detailed information, which can increase the upfront cost and time required to create and review plans. What is included in the permit, what requires a separate permit, and what may be a deferred submittal can be unclear. In the survey conducted for this study, 50% of housing developers cited the required level of detail for submittals as a major issue in the development process.

¹⁰ ORS 455.467

- **Increasing code complexity and energy standards.** The increasing complexity of building codes, specifically, new energy efficiency standards such as American Society of Heating, Refrigerating and Air-Conditioning Engineers (ASHRAE) standards, adds to review timelines and requires additional staff training. The additional design effort and plan requirements needed to ensure building plans meet new energy code requirements add to project costs and timelines. In the survey conducted for this study, 45% of developers noted that changing energy codes posed a major issue in the development process. This barrier was identified in the complementary SB 1537 "Impacts of State Policies and Programs on Housing Production" study and is discussed and addressed directly in the recommendations for that study.
- **Timing of correction identification.** As projects progress, new corrections may be raised in later rounds of review that were not identified in earlier reviews, leading to additional delays and costs for both the applicant and jurisdiction. In the survey conducted for this study, 53% of developers identified incomplete first reviews in the building review stage as a major issue in the development process.
- **Inspection-related delays and additional review cycles.** The inspection process can create unanticipated delays when inspectors stop an inspection after identifying a significant issue requiring demolition or rebuilding portions of work. This can lead to additional inspection cycles to identify other potential issues. In addition, inspector capacity can be a challenge in some situations: 24 % of development reviewers surveyed noted that inspector availability and scheduling pose a major burden in the development process.

Emerging Best Practices and Recommendations

The following best practices and recommendations are applicable to this phase of development.

- **Identify and Explain or Clarify Differences Between Land Use and Building Code Terminology:** Avoid or more clearly explain differences in terminology to reduce confusion by applicants.
- **Provide Guidance on Review Process Manufactured, Modular, and Prefabricated Dwellings:** Permitting guidance, and educational resources regarding manufactured housing, modular construction, and prefabricated structures.
- **Update Standards for Manufactured Dwelling Parks:** Improve clarity regarding applicable standards, permitted housing types, and regulatory authority within manufactured dwelling parks.

External Processes

Overview

Residential development projects in Oregon often require review, permits, approvals, or coordination with agencies and districts outside the local jurisdiction's land use, public works, and building departments. The review by these outside agencies and districts can include provision of urban services that are essential to serve the residential development. While there isn't exact data on this subject, it is more typical that review of a residential development project involves review by multiple entities than it is for staff from a single jurisdiction to provide all necessary reviews.

These external processes may involve state agencies, federal agencies, county offices, private utilities or special districts. Common examples at the state and federal level include Department of Environmental Quality (DEQ) 1200-C Construction Stormwater permitting, Department of State Lands (DSL) Removal-Fill permitting and U.S. Army Corps of Engineers (USACE) wetland and waterway permitting; Oregon Department of Transportation (ODOT) access, approach, and right-of-way permitting; Oregon Department of Parks and Recreation State Historic Preservation Office (SHPO) archaeological permits. Review by county staff is typically needed when a development accesses a roadway under the county's jurisdiction, which can occur along higher-classification roads within cities. Special districts typically provide a single specific service such as water, sanitary sewer, or fire protection. These reviews frequently occur concurrently with, or alongside, local development review processes and can influence project sequencing, permitting timelines, and development feasibility. In many cases, local jurisdictions rely on information, approvals, permits, or signoffs from outside agencies before local permits can proceed or before projects can advance to later stages of review, permitting, construction, or occupancy. Coordination between these processes can therefore affect the timing, sequencing, and predictability of residential development review.

The Role of State Policy in Local Development Review

Local development review processes in Oregon are substantially shaped by state statute, administrative rule, and state agency requirements. Oregon Revised Statutes and Oregon Administrative Rules establish the procedural and substantive framework within which local jurisdictions administer land use, public works, and building review, including requirements related to clear and objective standards, review and decision timelines, allowed housing types (like middle housing and accessory dwelling units), and public hearing limitations. State agency review requirements, including those administered by ODOT, SHPO, DEQ, DSL, and other bodies, also interact with and influence local review processes in ways that can affect project timelines and costs.

Given this relationship, many of the process-related barriers identified in this study have state-level dimensions. SB 1537 addresses this through a companion study, the Evaluation of State Policies and

Programs on Housing Production, led by the University of Oregon's Institute for Policy Research and Engagement (UO-IPRE), which examines how state policies, programs, and agency resources can be better aligned to increase housing production. While the two studies have distinct scopes, there is meaningful overlap in their findings, and the studies have shared insights and aligned their recommendations accordingly.

Potential Barriers

Potential barriers related to the integration of outside agencies into the local residential development review process include:

- **Unclear review responsibilities and routing procedures.** It is sometimes unclear who needs to review what materials and who is responsible for routing the materials to agencies. This is particularly true when a project does not have a land use process where a pre-application process is done, since there may not be another venue for staff to communicate to the applicant how the external reviews will relate to local reviews.
- **State and federal agencies review timelines.** The state and federal governments do not operate under the same timelines that local agencies do. Review by federal agencies, such as the USACE for wetlands and waterways, may significantly increase the development process timeline.
- **Unclear timing and sequencing of review signoffs.** The timing and sequencing of review signoffs is commonly unclear, creating uncertainty and potential delays during the review process. Building permit applications requiring state or federal review are exempt from statutory review timelines that apply to other projects.

The involvement of these external reviews is highly variable and site-specific. It is therefore difficult to suggest recommendations and promising practices for this topic.

Feasibility Analysis

Analysis Overview

ECONorthwest used three illustrative development scenarios—**subdivision development, multi-unit infill development, and quadplex middle housing land division**—to evaluate the impact of process delays and related costs on the financial viability of residential development. ECONorthwest used a pro forma to model a developer's decision-making process and cash flow during the development process for these illustrative scenarios. A pro forma is a standard real estate feasibility tool used to compare expected development costs, revenues, financing terms, and investor return expectations. In simple terms, it helps evaluate whether a project is likely to generate enough return to justify the cost and risk of development.

Each scenario reflects a prototypical housing type, with assumptions about **project scale and form, developer business model, and applicable review processes**. For each scenario, a representative development review process was mapped to identify the major permitting milestones, review sequence, and the costs and timelines associated with each stage of development. These process assumptions served as the foundation for the feasibility analysis by informing the development timelines, process-related costs, and sensitivity testing of longer review periods.

The scenarios presented in this section are **theoretical examples developed to provide a common project context** for the study's findings by development type. To provide a consistent point of comparison, all three scenarios assume the proposed housing type is an allowed use and can proceed under clear and objective land use standards and procedures.

Appendix F includes real-world project case studies documenting actual residential development projects.

Three Illustrative Development Scenarios

» **Subdivision Development with Detached Single-Unit Dwellings**

Assumes a 30-lot subdivision to be developed with single-unit detached housing and new local infrastructure within the development. Units are assumed to be built under ORSC.

» **Multi-Unit Infill Development**

Assumes a 40-unit multi-unit housing development on an infill site that does not require land division but does require public improvements to existing adjacent infrastructure. The housing is assumed to be built under OSSC.

» **Quadplex Middle Housing Land Division (MHL D)**

Assumes middle housing development with four attached units using a concurrent middle housing land division on an infill site that requires improvements to existing adjacent infrastructure. Units are assumed to be built under ORSC.

Testing Feasibility Under Different Conditions

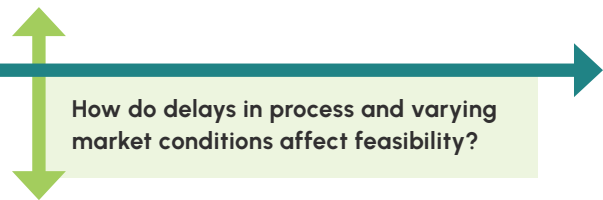
To understand how process delays may affect development feasibility under different conditions, ECONorthwest conducted sensitivity testing across varying **process conditions** (baseline process, slower reviews, and iterative reviews), and representative **market conditions** (low, average, and high). These conditions are simplified and illustrative. They are intended to show how different housing prototypes respond to changes in review predictability and process-related costs across different market conditions, rather than to estimate exact outcomes for any one jurisdiction or project.

PROCESS CONDITIONS

Baseline Process: Consistent with applicable statutory timelines, informed by permit data, reflects a reasonable shorter timeline for reviews.

Slower Review: Review times are double the baseline review times, informed by permit data, reflects a reasonable slower timeline for reviews.

Iterative Review: Assumes the same doubled review timeline as Slower Review, plus adds double the design and permitting costs to account for additional applicant effort to respond to comments or more complex standards.



MARKET CONDITIONS

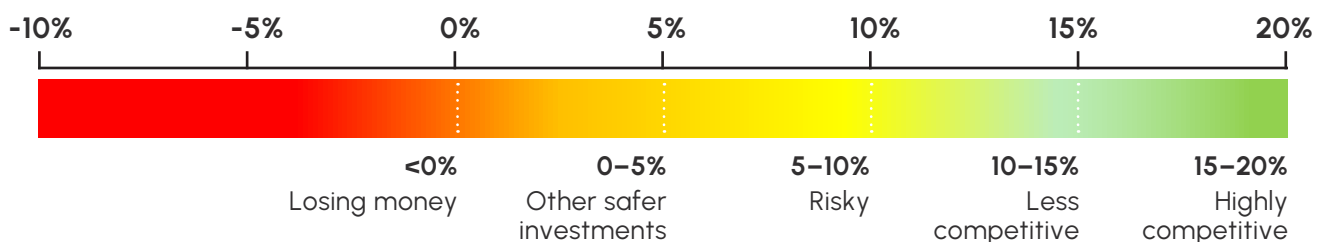
Low: Based on market prices and costs in smaller outlying markets in the state, such as the coast and eastern Oregon.

Average: Based on mid-priced markets such as the Willamette Valley.

High: Based on market prices and costs generally aligned with stronger markets in the Portland metropolitan area.

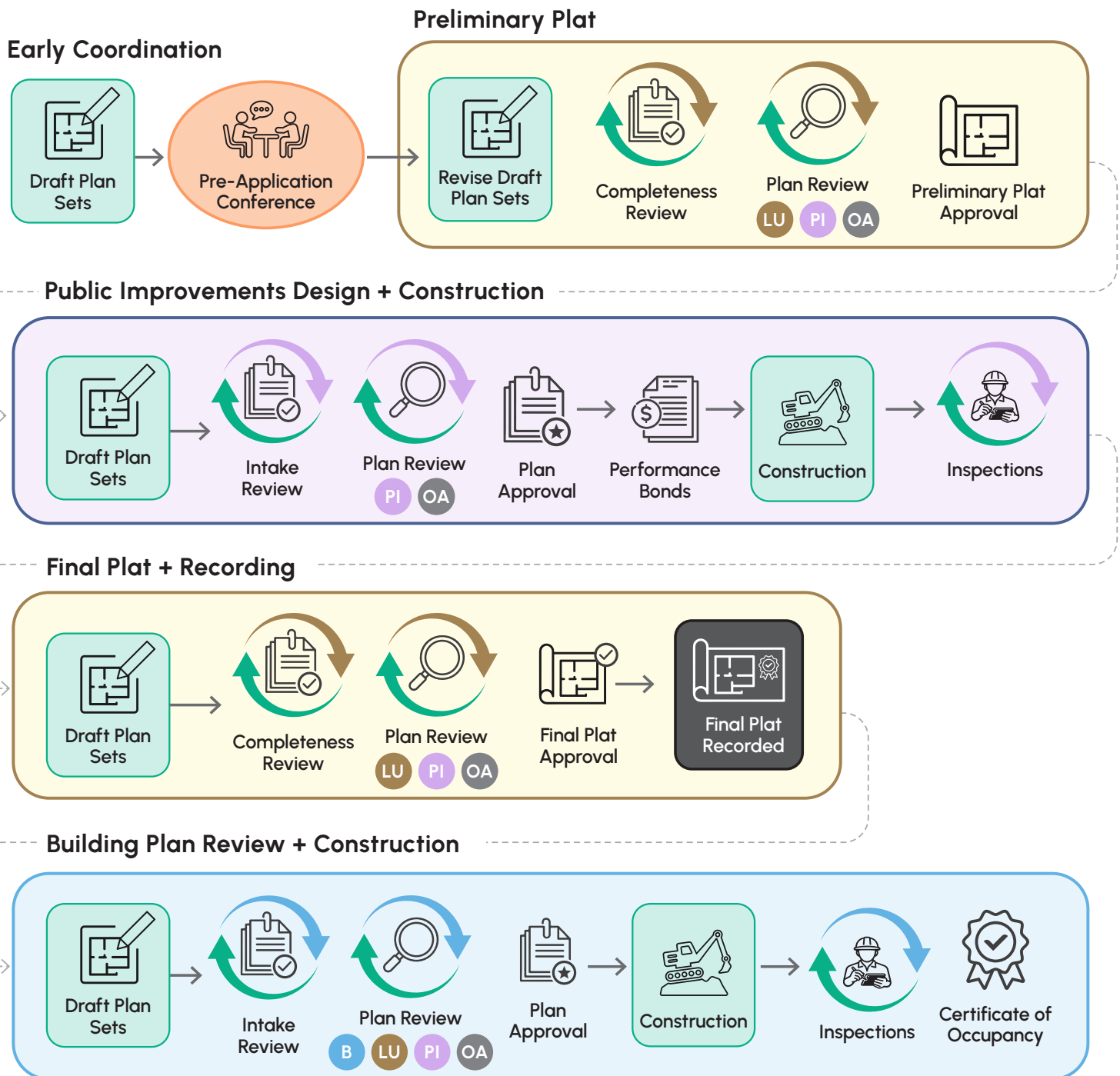
Internal Rate of Return

The pro forma analysis uses **Internal Rate of Return (IRR)**, which measures the **annualized return** a project or investment is expected to generate. IRR is highly sensitive to the time between investment and return, making it useful for understanding the effects of delay. A higher IRR indicates a more attractive investment, though higher-risk projects typically need higher returns to compensate for that risk. IRR is useful for this analysis because it reflects both the amount and timing of project cash flows. When a review process delays construction, sale, or lease-up, revenue arrives later and carrying costs increase, which can reduce financial returns. A “good” IRR depends on many factors, including the potential risk of the development, but the industry generally agrees that a double-digit return is needed to attract equity (e.g., 10% at the very minimum, though 15-20% is more competitive).



Subdivision Process Summary

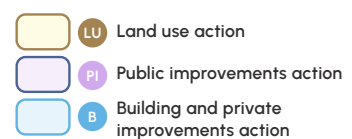
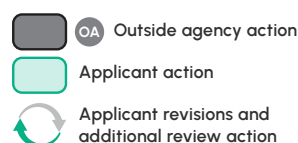
The **Subdivision Scenario** outlined below represents a straightforward example pathway for development of a **residential subdivision with new construction of detached single-unit homes on a vacant site** within city limits where the development can connect to adjacent infrastructure. This scenario assumes review processes for land division, public infrastructure improvements, and building construction.



Source: ECONorthwest, 2026



Note that additional or lengthy review cycles impact timelines and cost.



Subdivision Feasibility Summary

Subdivision Time Comparison

	Baseline Process	Slower/Iterative Reviews
Applicant <i>(land acquisition, preparing initial plans and application materials)</i>	15	15
Reviews <i>(land use, public improvements, and building reviews, including applicant revisions)</i>	17	34
Construction <i>(building and public improvements)</i>	12	12
Total Time	44	61

IMPACT ON PER UNIT COSTS

Slower reviews alone add about **\$5,600 to \$8,600** per unit (due to additional carrying costs) and can make an otherwise feasible development less competitive for financing. Iterative reviews, that take both more time and applicant effort, can add about **\$22,600 to \$25,600** per unit (due to additional carrying costs, design fees, and review expenses) and make an otherwise feasible development infeasible.

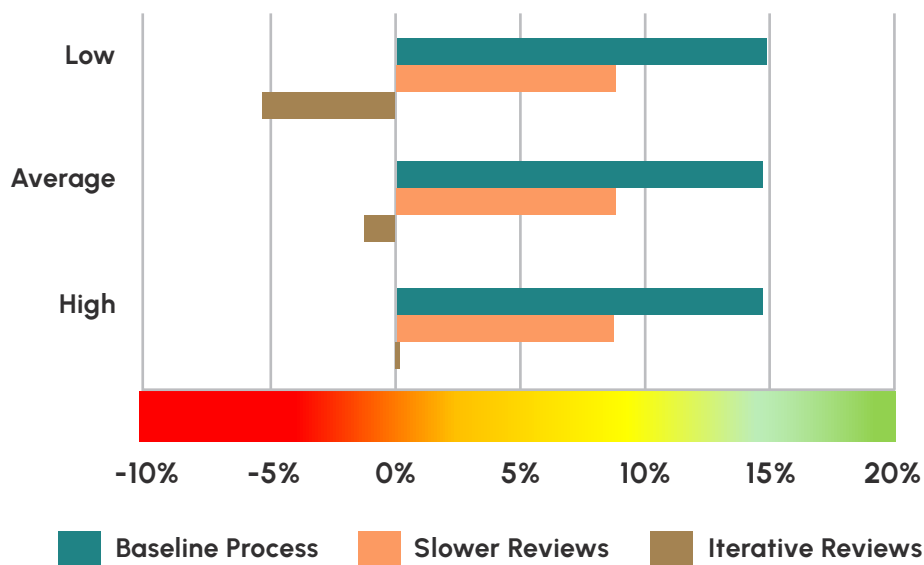
Per Unit Cost Increase from Baseline Process

	Slower Reviews	Iterative Reviews
Low Market	\$5,670	\$22,670
Average Market	\$7,330	\$24,330
High Market	\$8,670	\$25,670

IMPACT ON FEASIBILITY

When developers can predict that IRRs may be slightly below a level that is competitive for financing (such as the approximate 9% IRR achieved with the Slower Reviews process), they may try to increase feasibility by raising home prices or rents to absorb the added costs (if the market allows), or finding cost-savings elsewhere in the project. Where expected returns are too low (such as the approximate 0% to -5% observed with the Iterative Reviews process), they will likely abandon the development proposal.

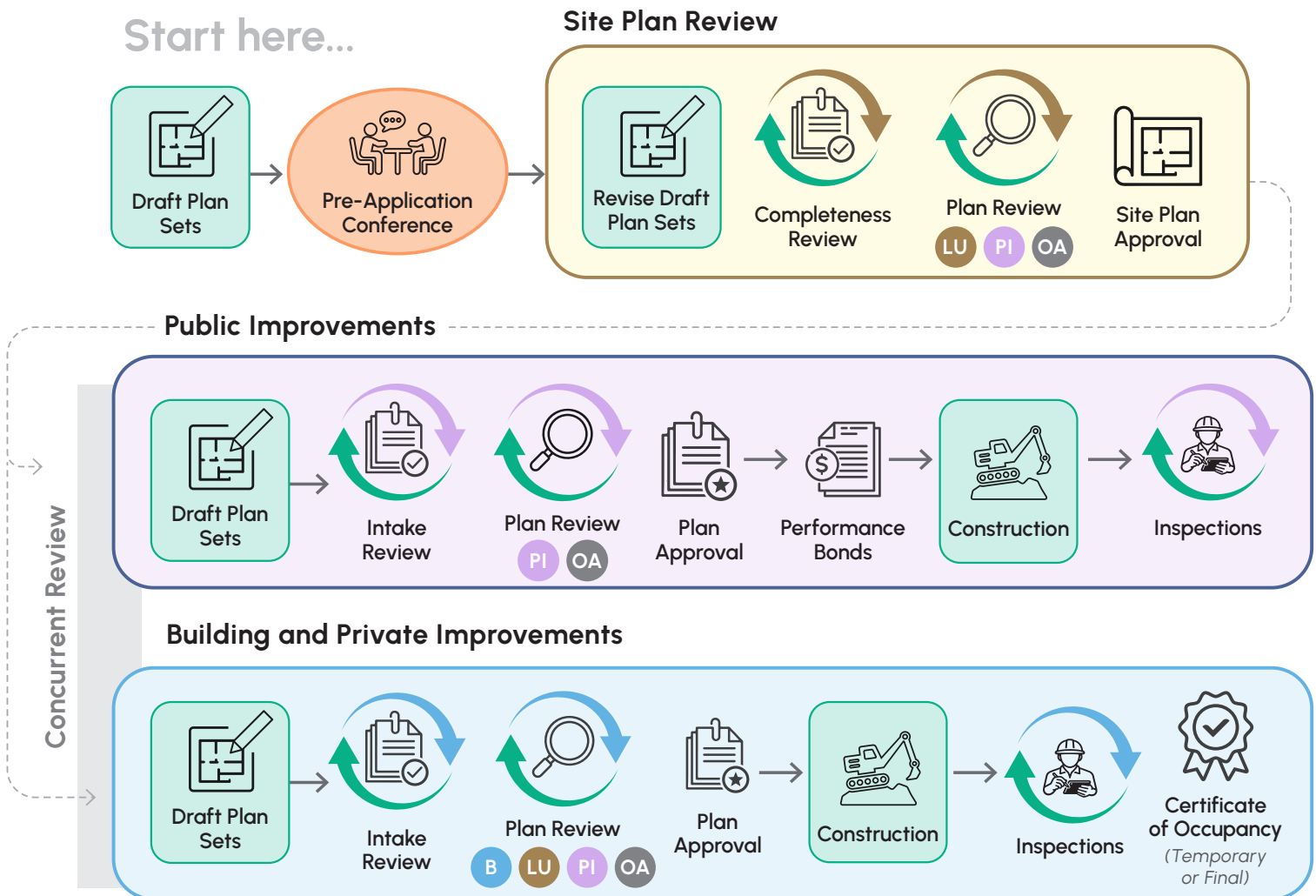
Subdivision IRR



If developers cannot predict serious process issues and lower returns in advance, they may abandon the project prior to beginning construction or complete the project but fail to provide expected returns to investors, making it less likely they will pursue development in the jurisdiction again.

Multi-Unit Process Summary

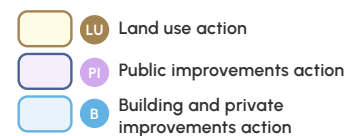
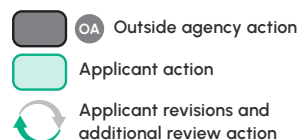
The **Multi-unit Scenario** outlined below represents a straightforward example of new construction for a **40-unit multi-unit residential rental development on a vacant site within city limits**, where the development can connect to adjacent infrastructure. The scenario assumes review processes for land use, public infrastructure improvements, and building construction.



Source: ECONorthwest, 2026



Note that additional or lengthy review cycles impact timelines and cost.



Multi-Unit Feasibility Summary

Multi-Unit Time Comparison

	Baseline Process	Slower/Iterative Reviews
Applicant <i>(land acquisition, preparing initial plans and application materials)</i>	32	32
Reviews <i>(land use, public improvements, and building reviews, including applicant revisions)</i>	15	30
Construction <i>(building and public improvements)</i>	16	16
Total Time	63	78

IMPACT ON PER UNIT COSTS

Slower reviews alone add about **\$2,700 to \$5,200** per unit (due to additional carrying costs) and can make an otherwise feasible development less competitive for financing. Iterative reviews, that take both more time and applicant effort, can add about **\$30,700 to \$33,500** per unit (due to additional carrying costs, design fees, and review expenses) and make an otherwise feasible development not competitive for financing.

Per Unit Cost Increase from Baseline Process

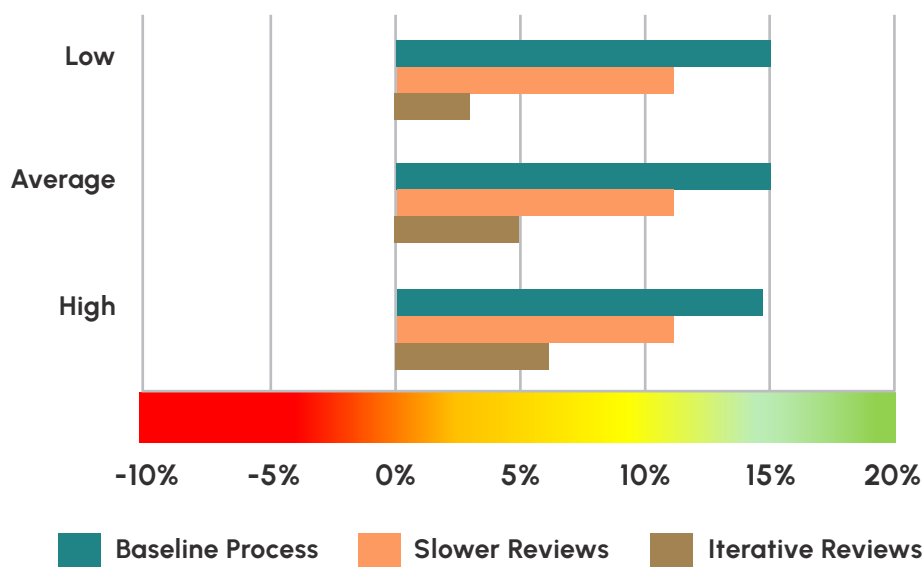
	Slower Reviews	Iterative Reviews
Low Market	\$2,750	\$30,750
Average Market	\$4,250	\$32,500
High Market	\$5,250	\$33,500

IMPACT ON FEASIBILITY

When developers can predict that IRRs may be slightly below a level that is competitive for financing (such as the approximate 11% IRR achieved with the Slower Reviews process), they may try to increase feasibility by raising home prices or rents to absorb the added costs (if the market allows), or finding cost-savings elsewhere in the project. Where expected returns are too low (such as the approximate 3% observed with the Iterative Reviews process in the low market), they will likely abandon the development proposal.

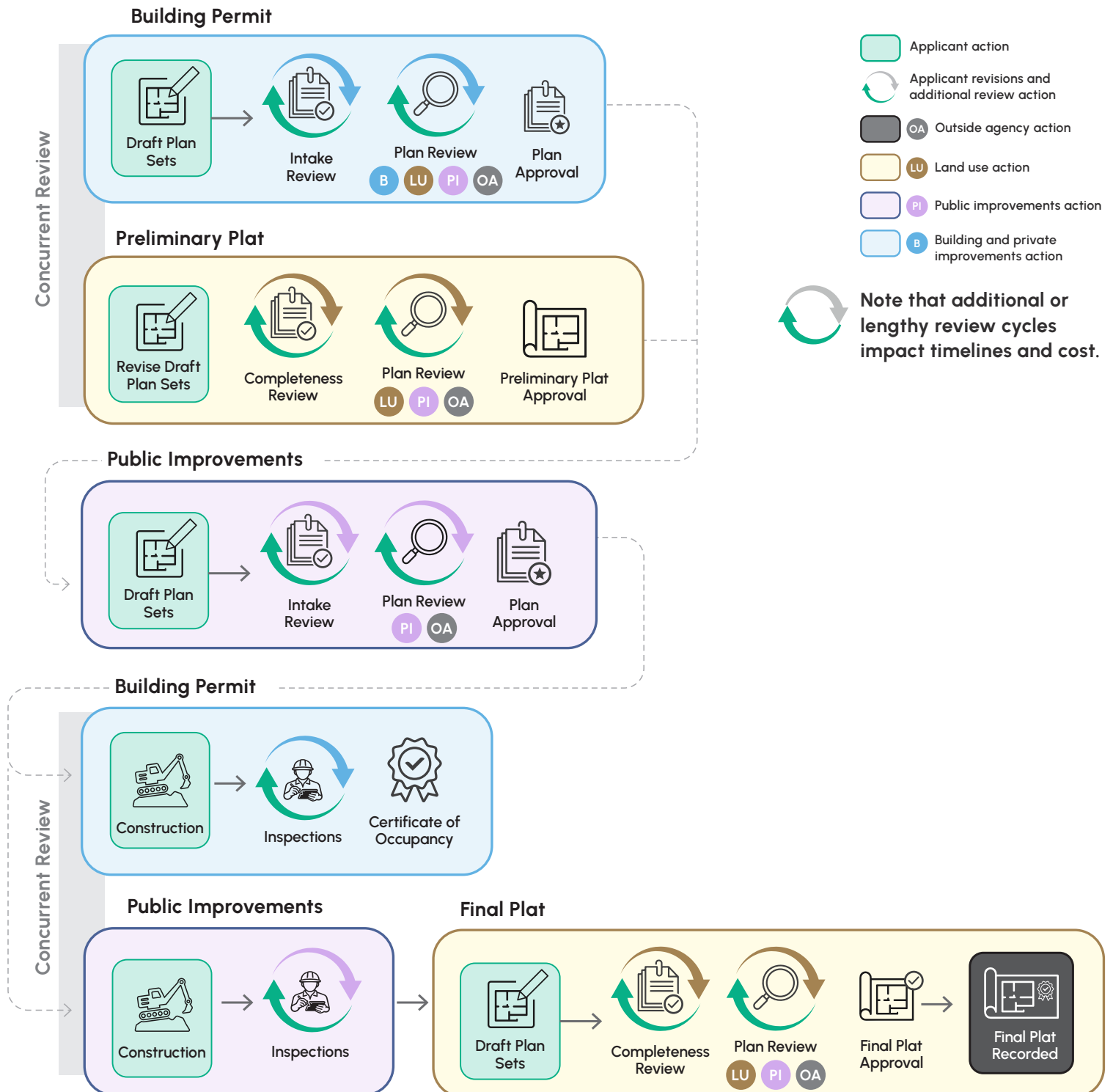
If developers cannot predict serious process issues and lower returns in advance, they may abandon the project prior to beginning construction or complete the project but fail to provide expected returns to investors, making it less likely they will pursue development in the jurisdiction again.

Multi-Unit IRR



Middle Housing Process Summary

The **Middle Housing Land Division Scenario** below shows a relatively straightforward path for building a **new for-sale quadplex using concurrent middle housing land division (MHLD)**. In this scenario, the four units are attached side by side rather than stacked, which allows the applicant to create a separate lot for each unit through MHLD. Assuming the units are separated by fire-rated walls from foundation to roof, they qualify as "townhouses" per building code definitions and remain under the ORSC rather than the OSSC.



Middle Housing Feasibility Summary

Middle Housing Time Comparison

	Baseline Process	Slower/Iterative Reviews
Applicant <i>(land acquisition, preparing initial plans and application materials)</i>	18	18
Reviews <i>(land use, public improvements, and building reviews, including applicant revisions)</i>	18	36
Construction <i>(building and public improvements)</i>	12	12
Total Time	48	66

IMPACT ON PER UNIT COSTS

Slower reviews alone add about **\$5,000 to \$7,500** per unit (due to additional carrying costs) and can make an otherwise feasible development less competitive for financing. Iterative reviews, that take both more time and applicant effort, can add about **\$31,000 to \$33,500** per unit (due to additional carrying costs, design fees, and review expenses) and make an otherwise feasible development infeasible.

IMPACT ON FEASIBILITY

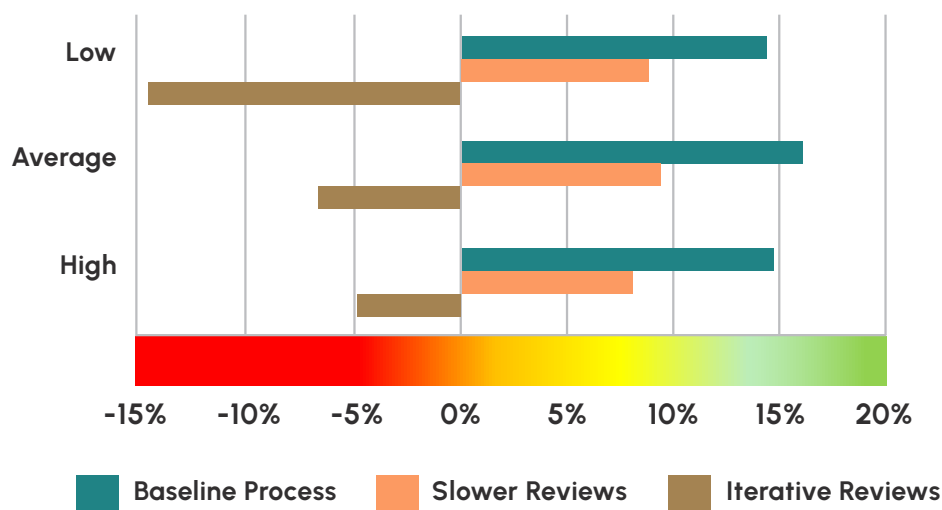
When developers can predict that IRRs may be slightly below a level that is competitive for financing (such as the approximate 8-9% IRR achieved with the Slower Reviews process), they may try to increase feasibility by raising home prices or rents to absorb the added costs (if the market allows), or finding cost-savings elsewhere in the project. Where expected returns are too low (such as the approximate -5% to -14% observed with the Iterative Reviews process), they will likely abandon the development proposal.

If developers cannot predict serious process issues and lower returns in advance, they may abandon the project prior to beginning construction or complete the project but fail to provide expected returns to investors, making it less likely they will pursue development in the jurisdiction again.

Per Unit Cost Increase from Baseline Process

	Slower Reviews	Iterative Reviews
Low Market	\$5,500	\$31,000
Average Market	\$6,750	\$32,250
High Market	\$8,000	\$33,500

Middle Housing IRR



Other Housing Scenarios

Beyond the three major housing types (single-unit detached, middle housing, and multi-unit), other factors can introduce particular process-related challenges for certain housing developments. Specific considerations related to **affordable housing**, **accessible housing** and **modular or prefabricated housing** are summarized below.

Affordable Housing

Increasing the supply of regulated affordable housing—housing that must remain affordable to households at defined income levels—is a statewide policy objective. Affordable housing generally goes through the same development review processes as market-rate housing and often looks similar to market-rate development once built. However, state and local policies provide some review and permitting advantages for affordable housing. State law requires expedited review for affordable housing applications—100 days, compared with 120 days for other housing within a UGB. State law also allows flexibility on certain development standards, such as density and height bonuses, for affordable housing. Local governments may offer additional incentives, including faster review timelines or added regulatory flexibility.

At the same time, affordable housing can face heightened process-related challenges. For example:

- These projects can attract more public opposition than market-rate development, especially when proposed within or near existing neighborhoods. As a result, discretionary review can carry greater risk of appeals or need for redesign.
- Affordable housing also often relies on sites that are difficult to develop. Some sites are available at low or no cost because they have wetlands, infrastructure constraints, or other site-related barriers. These conditions can increase the need for flexibility or make it more likely that review and permitting will take longer than expected. Funding requirements can add another layer of complexity.
- Affordable housing often must meet additional design standards—such as accessibility, energy efficiency, or unit size requirements—to qualify for, or compete for, state or federal funding. These requirements can make it harder to satisfy detailed local siting and design standards at the same time.

Delays can also have a disproportionate effect on affordable housing. Affordable developments typically rely on time-sensitive financing sources, such as Low-Income Housing Tax Credits (LIHTC), state housing funds, and bond financing. If design or permitting costs increase, or if required infrastructure improvements cost more than expected, the project may need additional gap financing. These issues are especially difficult late in the development process, after budgets are set and financing has been secured.

Accessible Housing

Advocates and project team members noted that accessibility requirements are not always reviewed or inspected consistently. Residential inspectors may see accessible housing features infrequently, and accessibility may not be a routine focus during inspections. As a result, some projects may be described as meeting a particular accessibility standard without consistent field verification that the standard was fully achieved.

This is more likely when the accessibility requirement comes from a funding requirement, land use condition tied to a regulatory incentive, or project commitment rather than from the building code. In these cases, building plan reviewers and inspectors cannot rely on building code authority to enforce the requirement, nor can they use building permit fee revenues to fund inspections for accessibility requirements outside the building code. This creates a gap between project requirements and quality control mechanisms.

Modular/Prefabricated

A “prefabricated structure,” or modular construction, is a building or subassembly that has been manufactured or had a substantial part manufactured or assembled using closed construction at an off-site location to be wholly or partially assembled on-site. Closed construction in this context means a factory-assembled structure or component that encloses factory-installed structural, mechanical, electrical, plumbing, or energy conservation equipment or materials inside a floor, wall, or roof cavity, which is not entirely open for visual inspection of the equipment or material at the site.¹¹ Modular construction is permitted through the Prefabricated Structure Program. The Prefabricated Structure Program follows the same building codes as site-built structures—the ORSC or OSSC depending on the building type. Modular construction, or prefabricated structures, typically require the prefabricated structure permit from the state as well as a local jurisdiction permit (e.g., foundation and/or siting permits), which may trigger site development or land use permits. Inspection responsibilities vary depending on whether the project is using prefabricated structures or prefabricated components.¹²

Note that prefabricated structures are separate from manufactured dwellings, or manufactured housing, which are factory-built residential structures constructed to federal manufactured housing construction safety standards and installed in accordance with an Oregon-approved installation code. Manufactured housing is required to be built to federal U.S. Department of Housing and Urban Development (HUD) standards and constructed by certified manufacturers.¹³

Local building design standards can create additional challenges for modular and prefabricated residential structures. Factory-produced housing and modular components typically rely on standardized,

¹¹ Oregon Building Codes Division. “Prefabricated Structures Program.” Oregon.gov. Accessed January 11, 2026. <https://www.oregon.gov/bcd/permit-services/pages/prefabricated-structures.aspx>

¹² Oregon Building Codes Division. “Prefabricated Structures Program.” Oregon.gov. Accessed January 11, 2026. <https://www.oregon.gov/bcd/permit-services/pages/prefabricated-structures.aspx>

¹³ 24 CFR Section 3282.362

repeatable designs to achieve cost savings and support industry scale. Requirements related to facade articulation, roof forms, materials, or neighborhood compatibility can require redesigns that undermine manufacturing efficiencies and reduce or eliminate cost savings. Appeals and quasi-judicial review processes can also create timing uncertainty, which can disrupt schedules tied to factory production, transportation, and installation.

Building permit, inspection, and infrastructure processes can create further obstacles. Local permitting staff may have limited familiarity with modular construction, leading to redundant reviews, inconsistent code interpretations, or uncertainty about the division of authority between factory and local inspections. Many jurisdictions also lack procedures for phased permitting or parallel review, which can prevent factory fabrication and site preparation from occurring at the same time and reduce modular housing's speed advantage. Utility hookups, transportation permits, crane operations, and street closures can further complicate delivery, especially in jurisdictions with limited staffing capacity or little experience with modular housing.

Recommendations

Conclusions and Key Themes

While Oregon is ahead of many states in reducing discretionary review processes for housing, there is more Oregon jurisdictions can do in many cases to streamline the development review and permitting process. Several key “cross-cutting” themes emerged across phases and housing types that indicate where there is potential for improvement in local residential development review processes:

- **Prioritizing a “getting to yes”** partnership approach among jurisdiction leadership and review staff to help applicants identify feasible paths to approval while ensuring compliance with applicable standards.
- **Improving applicant information & communication** through detailed submittal checklists, early assistance and pre-application conferences, guidance for less familiar housing types, review status transparency, and access to comments upon request before all reviews are complete.
- **Improving reviewer coordination and consistency** by designating housing development project coordinators, improving coordination with outside reviewers, and proactively resolving conflicting comments and interpretations.
- **Allowing overlapping reviews when appropriate** at the applicants’ discretion and risk to allow for shorter overall review timelines
- **Addressing standards that are creating process issues** through simplifying clear and objective zoning regulations, reconciling conflicting development regulations or infrastructure design standards, and ensuring required infrastructure improvements are predictable and aligned to what development can bear.
- **Building local capacity and providing technical assistance to support jurisdictions** in implementing recent housing legislation and adopting best practices.
- **Improving data tracking and accountability** to better understand development review performance and identify future opportunities for process improvement

In addition to these cross-cutting themes, this section identifies **phase-specific recommendations** that address barriers and opportunities unique to land use review, public improvements review, and building review.

Emerging Best Practices and Recommendations

The recommendations that follow are organized around these themes. **Exhibit 13** summarizes the recommendations by theme, notes which phase(s) they apply to, whether there is a state agency role in leading or supporting implementation, and whether legislation may be necessary or helpful to support implementation. The title of each best practice or recommendation links to additional details describing the recommendation, why it is important, considerations for implementation, and (where available) offering examples of successful implementation. See [Potential Legislative Recommendations](#) for a summary of legislative recommendations.

Key		
Phases	LU	Land Use Review
	PW	Public Improvements or Public Works Review
	BP	Building Permit Review
	All	Applies across LU, PW and BP review
Agency Role	Lead	State agency leads implementation.
	Support (Model)	Develop model policies, standards, templates, or guidance.
	Support (TA/\$)	Provide technical assistance and/or funding.
	Support (BCD, DLCD)	Technical assistance provided by the Building Codes Division and/or Department of Land Conservation and Development.
	Partner	Coordinate implementation with local governments.
	Rulemaking	Implement through administrative rulemaking.
	N/A	No additional state role identified.
Leg. Rec? <i>Does this recommendation include potential legislation?</i>	No	Legislation not identified as necessary or helpful at this time.
	In Part	Legislation may be necessary or helpful to advance a component of the identified best practice.
	Yes	Legislation may be necessary or helpful to advance implementation of best practices.

Exhibit 13. Summary of Best Practices and Recommendations

#	Recommendation	Phase	Agency Role	Leg. Rec.?
Cross-cutting practices to improve review across phases				
1.	Improve Applicant Information & Communication			
1.1	<u>Partnership Attitude from Jurisdiction Leadership</u> : Foster a culture of problem-solving among review staff, provide proactive support for needed housing developments.	All	N/A	No
1.2	<u>Detailed Submittal Checklists</u> : Detailed checklists so that applicants can better understand requirements before submitting.	All	Support (model)	No
1.3	<u>Early Assistance and Pre-Application Conferences</u> : Early meetings to help ensure the applicant understands the requirements.	All	N/A*	In Part
1.4	<u>Availability of Existing Infrastructure and As-Built Information</u> : Provide as-built information to applicants during pre-application conferences or early assistance.	PI	N/A*	No
1.5	<u>Provide Guidance to Applicants on Middle Housing Land Divisions</u> : Lay out the sequence of reviews and steps for middle housing land division for applicants.	All	Support (model/TA)	No
1.6	<u>Identify and Explain or Clarify Differences Between Land Use and Building Code Terminology</u> : Avoid or more clearly explain differences in terminology to reduce confusion by applicants.	LU, BP	Support (TA/\$)	In Part
1.7	<u>Provide Guidance on Review Process Manufactured, Modular, and Prefabricated Dwellings</u> : Permitting guidance, and educational resources regarding manufactured housing, modular construction, and prefabricated structures.	BP	Support (TA/\$)	No
1.8	<u>Clarify Requirements Related to Early Site Work</u> : Provide guidance on permits for early site work (e.g. grading, clearing, erosion control).	PI	N/A	No
1.9	<u>Transparent and Coordinated Permit Review</u> : Allow applicants to see the status of review, provide consolidated and reconciled	All	N/A	No

#	Recommendation	Phase	Agency Role	Leg. Rec.?
	comments to applicants when reviews are complete, while allowing applicants to view comments incrementally as reviews are completed upon request.			
2.	Improve Reviewer Coordination and Consistency			
2.1	<u>Housing Development Project Coordinator</u> : Point person or single point of contact for development review.	All	N/A	No
2.2	<u>Structured Communication and Coordination with Outside Agencies</u> : Establish clear lines of communication and coordination protocols with state agencies, special districts, and other entities.	All	Partner	No
2.3	<u>Discipline-Specific Coordination Meetings</u> : Proactive coordination within departments to resolve differences in interpretation	All	N/A	No
2.4	<u>Cross Discipline/Department Coordination Meetings</u> : Coordination between departments to reconcile conflicting requirements.	All	N/A	No
2.5	<u>Engaging Contracted Reviewers</u> : Coordinated communication between jurisdiction staff and third-party contracted reviewers.	All	N/A	No
3.	Expand Options for Concurrent Review			
3.1	<u>Final Plat Sequencing</u> : Allow concurrent rather than sequential review steps, such as assigning addresses and final review of construction documents.	All	N/A	No
3.2	<u>Performance Bond and Substantial Completion for Public Improvements</u> : Refine definition of substantial completion for public improvements for more consistent implementation of prior legislation to avoid delays for subdivisions.	PI	Rule-making	Yes
3.3	<u>Concurrent Land Use, Building, and Public Improvement Reviews for Non-Land Division Projects</u> : Allow concurrent reviews across phases for non-land division projects at the applicant's risk.	All	N/A*	Yes
3.4	<u>Site Work Permitting Concurrent with Land Use Review</u> : Allow applicants to submit permits for site work (e.g., grading and erosion control) concurrently with land use review.	LU, PW	N/A	Yes

#	Recommendation	Phase	Agency Role	Leg. Rec.?
4.	Capacity Building and Technical Assistance for Jurisdictions			
4.1	Share Staff Capacity Across Small Jurisdictions : To address staff capacity challenges, adopt state-level or local agreements where jurisdictions can share review staff.	All	Support (model)	No
4.2	Simplify and Support Local Implementation of Housing-Related Legislation and Rulemaking : Consolidate legislative deadlines and provide technical support and guidance to cities.	LU / All	Lead (DLCD)	Yes
4.3	Staff Training : Training and retention efforts for local staff.	All	Support (BCD, DLCD)	No
5.	Data Tracking & Accountability			
5.1	Standardize Development Review Data Collection and Performance Tracking : Track and report on permit timelines, and make it easier for jurisdictions to use state permit systems for reporting.	All	Support (BCD, DLCD)	No
Targeted Improvements to Specific Review Phases				
6.	Land Use Reviews			
6.1	Simplify Clear & Objective Zoning Regulations : Evaluate and refine clear and objective standards to reduce the level of detail or provide a wider range of options.	LU	Support (Model)	No
6.2	Opportunities to Modernize Final Plat Requirements : Reduce delays associated with final plat processing by modernizing review, routing, and approval procedures.	LU	N/A	No
6.3	Opportunities to Standardize Final Plat Requirements : Improve predictability and consistency in final plat submittal and approval processes across jurisdictions within a county or region.	LU	Support (Model)	No
6.4	Remove Local Procedural Requirements to have Final Plat Approval via City Council : Remove local requirements that city councils approve final plats.	LU	N/A	Yes

#	Recommendation	Phase	Agency Role	Leg. Rec.?
6.5	<u>Utilize Model Code Resources from the State Where Possible:</u> Reduce standards variability and review processes for the same type of development in different jurisdictions.	LU	Support (Model)	No
6.6	<u>Remove Neighborhood Meeting Requirements:</u> Remove neighborhood meeting requirements for residential land use applications.	LU	N/A	No
6.7	<u>Streamline Land Use Review for an Allowed Use on a Lawfully Established Lot:</u> Allow development to proceed as a building permit review or offer concurrent land use and building permit review.	LU	N/A	No
6.8	<u>Use a Hearings Examiner for Appeals:</u> For local land use appeals, rely on a hearings officer rather than the Planning Commission to reduce the influence of local opinion.	LU	N/A	Yes
7.	Public Improvements Requirements and Reviews			
7.1	<u>Reform Exactions for Transportation Improvements:</u> Reduce exactions and negotiation over required public improvements for transportation.	PI	Support (Model)	No
7.2	<u>Proactive Infrastructure Planning by Jurisdictions and Special Districts:</u> Evaluate needed improvements and funding mechanisms in advance to reduce burden on individual developments.	PI	Support (TA/\$)	No
7.3	<u>Align Street and Access Standards Across Departments and with External Reviewers:</u> Coordinate requirements to reduce conflicts and confusion.	PI, LU	Partner	No
7.4	<u>Update Public Works Design Standards Related to Middle Housing</u> to reflect recent changes in housing laws and support middle housing development.	PI	N/A	No
7.5	<u>Cite Relevant Public Works Designs Standards</u> when providing comments to applicants.	PI	N/A*	Yes

#	Recommendation	Phase	Agency Role	Leg. Rec.?
7.6	Allow Flexibility on Timing of Minor Public Works Improvements : Allow applicants to decide timing of improvements like sidewalk construction with subdivision or with construction of units.	PI	N/A	No
7.7	Allow Licensed Engineers to Self-Certify Public Improvement Plans for simple public improvements, such as sidewalk infill.	PI	N/A	Yes
8.	Building Reviews			
8.1	Update Standards for Manufactured Dwelling Parks : Improve clarity regarding applicable standards, permitted housing types, and regulatory authority within manufactured dwelling parks.	BP	Lead	No

Note: * Not applicable, except in instances where the state agency is serving in a development review role itself.
TA/\$ = Provide and/or fund technical assistance to local jurisdictions.

Summary of Legislative Recommendations

The following recommendations identify areas where legislation may be necessary to implement identified best practices, as well as areas where legislation could appropriately require implementation of key best practices across all or a subset of jurisdictions. Where legislation could support broad implementation, there may be costs to local governments or other unintended consequences resulting from making best practices mandatory rather than simply recommended. Implementation considerations are identified for each recommendation to highlight potential challenges at the local level.

While the recommendations contain a high level of detail, not all elements require legislative action. The list below focuses specifically on the components of each recommendation that require legislative action to drive meaningful change.

Best Practices that May Require Legislation to Enable Change

1.6: [Identify and Explain or Clarify Differences Between Land Use and Building Code Terminology](#):

Following a detailed technical review of terminology differences between housing-related statutes and state building code, consider clean-up legislation to reconcile differences where appropriate.

3.2: [Performance Bond and Substantial Completion for Public Improvements](#): Direct agency rulemaking to clarify the statutory definition of substantial completion for public improvements.

4.2: [Simplify and Support Local Implementation of Housing-Related Legislation and Rulemaking](#):

Consolidate legislative implementation deadlines for future housing-related legislation. Include direction to DLCD or other relevant state agencies to conduct rulemaking to address details.

7.7: [Allow Licensed Engineers to Self-Certify Public Improvement Plans](#): Enable jurisdictions to establish self-certification programs for privately engineered public improvements.

Potential Legislation to Achieve Consistent Implementation of Key Best Practices

1.3: [Early Assistance and Pre-Application Conferences](#): For jurisdictions that charge for pre-application conferences, written notes from these meetings should include references to all applicable standards for land use, public improvements, and building and all relevant reviewing departments and agencies should participate to ensure applicants receive coordinated and complete guidance early in the process. (Does not apply to free pre-application conferences or other forms of free assistance to applicants.)

1.9: [Transparency and Coordinated Permit Review](#): Jurisdictions must configure electronic permitting systems to allow the applicant to view the status of applications. (This does not require providing visibility to reviewer comments, only to current status.) Direct BCD to provide or fund technical assistance to small jurisdictions to implement this change where needed.

7.5: [Cite Relevant Public Works Design Standards](#): When issuing comments or redlines to an applicant related to privately engineered public improvements, the jurisdiction must cite the relevant public works design standards or other reference for the requirement in question ("cite it, write it").

Concurrent Reviews and Sequencing: Jurisdictions must allow applicants the option to submit for concurrent reviews including:

3.3: [Concurrent Land Use, Building, and Public Improvement Reviews for Non-Land Division Projects](#)

3.4: [Site Work Review Concurrent with Land Use Review](#)

6.7: [Streamline Land Use Review for an Allowed Use on a Lawfully Established Lot](#): Where a land use review is required for needed housing that is an allowed use on an established lot and meets minimum densities for the applicable zone, allow concurrent review of both the land use application and building permit application.

6.4: [Remove Requirement to have Final Plat Approved by City Council](#): Prohibit jurisdictions from requiring approval of final plats at a public meeting, even if there is no hearing.

6.8: [Use a Hearings Examiner for Appeals](#): Require jurisdictions to use a hearings examiner as the appeal body for land use applications for needed housing. This could require DLCD to establish contracts to facilitate on-call access to hearings officers for small jurisdictions across the state.

Recommendations and Promising Practices Details

This chapter provides detailed information on each recommendation and promising best practices identified through this study. Each entry is organized using a consistent format to help readers understand what the recommendation involves, why it matters, and how it can be implemented. The following information is provided for each recommendation:

Title

Category: Describes whether the recommendation requires local action, state action, legislation, or some combination.

Actor: Identifies which entities are best positioned to implement the recommendation, such as local planning, building, or public works departments, state agencies, or the Legislature.

Phase of development: Indicates where in the development review process the recommendation applies, whether land use, public improvements, building permitting, or across multiple phases.

Applicability: Describes any limits on which jurisdictions can implement the recommendation, and whether it is particularly relevant for certain jurisdiction sizes, geographies, or housing types.

Description

Explains what the recommendation involves and what it looks like when implemented well.

Why this helps

Summarizes the rationale for the recommendation and describes how it affects housing production in terms of time, cost, complexity, or uncertainty, drawing on evidence from the study's surveys, focus groups, permitting analysis, and case studies.

Implementation considerations

Identifies factors that may make implementation challenging, including resource requirements, potential trade-offs, unintended consequences, and implementation partners.

Examples of successful implementation elsewhere/success stories

Where available, recommendations highlight real-world examples of jurisdictions or organizations that have implemented similar approaches effectively, in whole or in part, including findings from the case studies and focus groups (conducted for this study), and the project team's professional experience.

Cross-cutting practices to improve review across phases

1. Improve Applicant Information & Communication

1.1. Partnership Attitude from Jurisdiction Leadership

Category: Local action

Actor: Local jurisdiction, all departments involved in development review

Phase of development: All phases

Applicability: All jurisdictions, and all housing types. Smaller jurisdictions where development is more closely linked to economic development goals tend to do this more than larger jurisdictions but can apply to all.

Recommendation/Description

A collaborative and solutions-oriented approach from jurisdiction leadership can help streamline the development review process and reduce unnecessary delays. This includes promoting a pro-growth and partnership-oriented culture among staff and reviewers, with an emphasis on communication, responsiveness, efficient issue resolution, problem-solving, and "getting to yes."

Additional strategies aligned with this approach include:

- Conducting timeline and process audits to identify how long reviews are taking and where delays or bottlenecks are occurring on a local jurisdiction basis (see [Data Tracking & Accountability](#)).
- Establishing local review timeline goals and performance benchmarks.
- Increasing transparency and accountability through publicly available review metrics or development dashboards that track permit and review timelines.
- Improving interdepartmental coordination (see [Discipline-Specific Coordination Meetings](#) and [Cross Discipline/Department Coordination Meetings](#)).

Why it helps

This type of partnership attitude and "getting to yes" mentality can help the process run more smoothly for both the developer and city staff, which ultimately helps lower costs. Reducing the number of iterations for design updates can reduce the time and effort required from development teams, reducing costs for design and engineering.

- **Focus group findings:** This topic was raised in the focus group.
 - "Some local jurisdiction staff have an attitude of wanting to get to yes and get out of the way. That attitude typically has great staff coordination." (Developer, Portland Metro, Willamette Valley, Central Oregon, and Oregon Coast)
 - "If all staff could have a "get to yes" mentality - have early and often communication, create more predictability in timelines - would help the development review process greatly." (General Contractor, Eastern Oregon)

- **Case study findings:** The development team of Upland Meadows partially attributed the project's success to the City of Hermiston's overall supportive attitude toward development. For example, the City proactively worked with the developer to help find alternatives to satisfy the fire access requirements, which avoided the cost of having to add a full driveway.
- **Survey findings:**
 - In the survey conducted for this study, "partnership attitude from jurisdiction leadership" received the highest share of first-place rankings, with nearly 40% of developers represented in the housing producer survey identifying it as the most helpful practice for reducing process-related barriers to housing production.

Implementation considerations

- In larger jurisdictions, this pairs well with [Cross Discipline/Department Coordination Meetings](#) and [Discipline-Specific Coordination Meetings](#) to communicate goals and priorities to staff.
- May be politically challenging in jurisdictions where local elected officials are more ambivalent toward growth and development.
- Cities might also want to involve developers in general policy discussions when considering changes that impact housing. The developer of Upland Meadows was very appreciative of such efforts in the **City of Hermiston**.

Examples of successful implementation elsewhere/success stories

- **Cottage Grove, OR:** According to both city staff and the development team, the smooth and successful development of Harrison Village in Cottage Grove, Oregon was largely the result of a strong partnership between both parties as well as clear and consistent communication throughout the process. The development team stressed that responsive and communicative City staff helped make the development process go smoothly. Staff also highlighted the importance of communication with other City departments
- **Redmond, OR:** A developer participating in the focus groups conducted for this study highlighted the City of Redmond as an example of a jurisdiction with a notably collaborative approach to development review. The developer noted that Redmond maintains well-documented plans and processes and that pre-application meetings routinely include senior planning and building department leadership with the authority to make decisions. The overall approach was characterized as facilitative and solution-oriented, with staff focused on helping applicants navigate requirements rather than simply enforcing them.

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1.2. Detailed Submittal Checklists

Category: Local action

Actor: Local jurisdiction, planning/building/public works departments, state agencies (DLCD/HAPO and BCD)

Phase of development: Application preparation and completeness review at all stages of development (land use, public works, and building permitting).

Applicability: Can be relevant for all jurisdictions and all housing types. Especially helpful for less experienced development teams and those working across many jurisdictions.

Description

Detailed submittal checklists for land use, public works, and building permit reviews so that applicants can better understand their requirements before submitting. Checklists can:

- Identify applicable regulations for a given type of review or situation
- Identify what materials must be submitted for different types of applications
- Specify what must be shown on plan sets

Why this helps

Detailed submittal checklists could help applicants submit complete applications and eliminate unexpected submittal requirements, thus reducing time and uncertainty in the completeness review process. Clear checklists also improve staff efficiency by reducing time spent responding to incomplete applications and clarifying submittal expectations. They also create consistency within individual departments; it is not uncommon for one reviewer to require more or different information on a project than another reviewer would. Providing a consolidated list of additional attachments applicants need to provide beyond the plan set and application can reduce the time spent on rounds of completeness.

- **Survey findings:** In the survey conducted for this study, 48% of developers represented in the housing producer survey reported that unclear submittal requirements were occasionally or frequently a major issue.
- **Focus group findings:** Several focus group participants raised this topic.
 - Land use regulators noted that inconsistent application quality and varying levels of applicant experience often result in incomplete submittals and multiple rounds of completeness review.
 - Building regulators identified earlier identification of incomplete applications as an opportunity to streamline the process.
 - Subdivision developers noted that unclear or inconsistent completeness reviews can create uncertainty and contribute to permitting delays.

Implementation considerations

- Preparing detailed submittal checklists is time-consuming for jurisdictions. In addition, to be an effective tool, checklists must be maintained to ensure they are accurate. This can be particularly challenging when state regulations are changing rapidly.

- Consider providing hyperlinks in checklists to provide guidance on location of requirements in development code. However, there is an element of maintenance that goes into ensuring the checklists are up to date.
- Detailed checklists for new construction are straightforward. Detailed checklists applied to alterations and change of occupancy can result in applicants having to provide documentation that is not necessary based on their specific limited scope of work. This can result in them providing more work than is necessary to be able to check off all the items on the list before they are allowed to submit for permit.
- It can be difficult to prepare (and confusing to use) checklists that meaningfully reflect the range of possible variables (site location, housing type, site constraints, etc.). The greater the level of detail provided in a checklist, the greater the opportunity for inconsistency with the regulations. There is also a tendency for both applicants and staff to ignore lengthy checklists, especially when checklist information is not updated.
- State agencies could support implementation by developing optional model submittal checklists and sample application forms that jurisdictions could adapt to local procedures and standards or by providing a library of examples from local jurisdictions as a resource. The state has already begun developing these resources and could continue to build on those efforts.
- Checklists need to be located intuitively on website for easy access.

Examples of successful implementation elsewhere/success stories

- A number of jurisdictions are successfully using detailed checklists for at least some types of reviews. Over 60% of jurisdictions represented in the development reviewer survey reported using submittal checklists. Review checklists enable applicants to have a clear understanding of all items needed for intake and first review, enabling the applicant to not have multiple rounds of intake review. Some examples include:
 - **City of Portland:** [SB 1537 Mandatory Adjustments Supplemental Application Form](#)
 - **City of Hillsboro:** [Zoning Review \(ZR\) Checklist Triplexes and Quadplexes](#)
 - **City of Gresham:** [Residential Footing and Foundation Inspection Checklist](#)
 - **City of Bend:** [Commercial Buildings Checklist](#)
 - **City of Happy Valley:** [Engineering Plan Review Process Overview](#)
 - **City of Hermosa Beach, CA:** [Consolidated Permit Review Program](#)

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1.3. Early Assistance and Pre-Application Conferences

Category: Local best practice; state action

Actor: Local jurisdiction: land use planning / public works / building departments; DLCD

Phase of development: Application preparation at all stages of development (land use, public works, and building permitting).

Applicability: All jurisdictions, and all housing types. Most helpful for complex projects and less experienced developers.

Description

Early assistance and pre-application conferences with written notes available to applicants that are accessible, optional, free or low cost, well coordinated, clearly communicated, and cross-departmental, to help ensure the applicant understands the requirements. Developers generally prefer optional rather than mandatory pre-application conferences to maintain flexibility. Less formal free consultation opportunities short of a full pre-application conference can be helpful early in the predevelopment process to help potential applicants understand applicable regulations, procedures, and requirements. Jurisdictions may also consider more flexible pre-application models that allow experienced applicants to tailor meeting participation based on project needs. When jurisdictions require or charge fees for pre-application conferences, all relevant reviewing departments and agencies should participate to ensure applicants receive coordinated and complete guidance early in the process.

DLCD could support this effort by funding early assistance for residential projects (e.g., by reimbursing jurisdictions a fixed amount if they waive their normal pre-application fee). This could entail project qualification criteria to ensure the project is ready for review and will support needed housing types.

Why this helps

Similar to [Detailed submittal checklists](#), early assistance and pre-application conferences could help applicants submit complete applications and eliminate unexpected submittal requirements, thus reducing time and uncertainty in the completeness review process. Pre-application conferences that include all departments and affected agencies (including outside agencies such as ODOT, utilities, or service districts) can provide an opportunity to address cross-jurisdictional issues before an applicant submits an application, reducing the likelihood of conflicting comments later in review. Pre-application conferences help applicants identify potential public improvement requirements, such as right-of-way dedication, easements, frontage improvements, or utility obligations, early in the development process. Experienced applicants often use pre-application meetings specifically to better understand these requirements before advancing project design, helping reduce redesigns, improve project feasibility analysis, and support a more predictable development review process. Experienced development team members consistently recommend pre-application conferences, especially for complex projects and sites.

- **Survey findings:** In the survey conducted for this study, developers generally suggested that pre-application conferences posed only a minor inconvenience, with nearly half reporting that they were not an issue. Over 60% of jurisdictions represented in the development reviewer survey reported using pre-application meetings.

- **Focus group findings:** Several focus group participants raised this topic.
 - *"The more prepared an applicant is for plan review, the better off you are. Prescreening and pre-submittal measures help get applications through the door in a better position to move forward. Rather than leaving prescreens to permit techs, the city assigns them to each department that will ultimately review the application."* (Building Official, Large City, Willamette Valley)
 - *"Pre-application meetings are helpful, but a lot of things can change and fall apart between the pre-application meeting and the final land use permit."* (Developer)
 - *"A lot of cities require mandatory pre-apps but the comments don't give you anything important. You still have to chase down departments to get comments in writing."* (Private-sector planner, Oregon Coast)
 - *"We followed the pre-application suggestions and still hit the 'never mind, we want this' whiplash - causing resubmittals and even starting over."* (Developer)
- **Case study findings:** Informal early assistance and easy access to experienced and knowledgeable jurisdiction staff was identified in the Upland Meadows, Colonia del Valle Próspero, and Harrison Village case studies as a key factor in ensuring that the subsequent permitting process went smoothly.

Implementation considerations

- Preparing for and attending pre-application meetings and providing quick responses to informal developer inquiries takes significant staff time. This can take time away from reviewing applications that have been submitted.
- To cover the cost of providing free or low-cost pre-application conferences, jurisdictions must use general fund or other sources, which could reduce money available for other local housing programs. In jurisdictions that use consultants for some aspects of staff review, the cost of consultant participation must be covered by the jurisdiction (if not covered by the applicant). Some pre-application conferences are simply prepurchase inquiries that do not result in an application, so the expense is not necessarily captured through a subsequent application fee. Staff from the City of Hermiston noted that providing free pre-application meetings has not caused major issues for their city, although cities with different fiscal and staff capacities or development patterns might face increased fiscal strain from fully covering these costs.
- If DLCD supports this effort through funding for free early assistance or pre-application conferences, the reimbursement process should be designed to be administratively simple (e.g., a fixed fee for meetings in exchange for pre-app meeting materials.).
- The usefulness of a pre-application meeting is somewhat dependent on the level of detail about the development provided by the applicant. It can be difficult for a jurisdiction to provide much input based on vague plans. Early inquiries where applicants have little detail regarding what they'd like to do with the property may be better addressed through less formal means, such as brief free consultations at the permit counter and by phone or email. Pre-application guidance is generally advisory and nonbinding, based on the information available at the time, and additional issues or different interpretations may arise during formal application review as more detailed plans are submitted. This uncertainty limits can limit a pre-app's usefulness for developers seeking clarity on key issues before submittal.

- Jurisdictions don't typically have the ability to require non-jurisdiction staff (e.g., ODOT, service districts, utilities) to participate. However, city staff can try to involve staff from other jurisdictions. For example, the City of Hermiston invites regional ODOT staff to the pre-application meetings for all projects that affect a state highway, which staff noted was very helpful. In addition, cities that rely on special districts for utilities may be able to establish relationships and practices that integrate special district reviewers.
- Requiring pre-application conferences prior to submittal can add time for developers, though it may help the review process go more smoothly.

Examples of successful implementation elsewhere/success stories

- **City of Hermiston:** While not required, the City of Hermiston encourages applicants to join pre-application meetings, which has no charge. These meetings generally involve staff from all reviewing departments who try to work out the project details and requirements in the early phases. Clear and upfront requirements from the outset helped support a smooth development process for Upland Meadows, according to those involved.
- **City of Cottage Grove:** The City of Cottage Grove does not require formal pre-application meetings but can still have informal discussions with the applicant before the project gets underway, as was the case with Harrison Village. The developer noted that City staff were very upfront with the requirements, with staff highlighting all the applicable requirements for each department in a single place. The developer and city staff suggested that the clear and upfront requirements helped ensure a smooth and successful development process.
- **City of Woodburn:** Prior to meeting with the applicant, the City of Woodburn prepared for pre-app meeting with internal coordination and discussions between all internal departments and external regulating authorities, including the fire department and electric utility. They were able to highlight the concerns clearly in the pre-app meeting, including where conflicts in utilities/easements/access may occur due to various department priorities/codes.
- **City of Portland:** Portland offers free 15-minute phone consultations with planning staff, providing applicants with an accessible entry point to the development review process before committing to a formal pre-application conference. This can be particularly valuable for less experienced developers or those exploring a project for the first time, helping them understand basic requirements and next steps without incurring upfront costs.
- **City of Gresham:** Gresham designates a planner to handle inquiries and allows applicants to reach planning staff directly by phone or voicemail for general questions about the development review process. Staff aim to respond promptly, providing a low-barrier way for applicants to get quick answers on zoning, submittal requirements, or process questions without scheduling a formal meeting.

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1.4. Availability of Existing Infrastructure and As-Built Information

Category: Local best practice

Actor: Local jurisdiction: public works departments

Phase of development: Early coordination with staff (e.g., pre-application meeting), public improvements

Applicability: All jurisdictions and all housing types where public improvements are needed.

Description

Having existing infrastructure records, utility information, and as-built drawings available to applicants for pre-application conferences or early assistance. The most convenient method for development teams to access this information is an online GIS.

Why this helps

Access to this information early in the process can support more accurate site planning, engineering design, and development review. Centralized, up-to-date, and accessible infrastructure data can reduce uncertainty for applicants and reviewers, minimize conflicting assumptions during design, and help identify potential infrastructure constraints earlier in the process. Having access to this information is especially valuable during initial project feasibility review and drastically reduces the amount of time that needs to be spent during this phase. Along with development code and public facility master plans, utility records are one of the first things evaluated for a potential development. For example, reliable as-built drawings can illustrate whether a property can be served with public water, gravity sanitary sewer, and stormwater conveyance infrastructure.

- **Survey findings:** In the survey conducted for this study, 58% of developers represented among housing producers reported that determining what required infrastructure improvements were needed was occasionally or frequently a major issue.
- **Case study findings:** The development team in the Colonia del Valle Próspero project reflected on breaking ground for construction and encountering different underground utility depths than what City records indicated. This context led to delays in confirmation of how to continue site work.

Implementation considerations

- Good records are required and it takes significant effort to implement.
- Maintenance of records is essential to keep information up to date.
- Many records may not be digital so sharing with customers requires tracking down physical originals and making large print copies which can be expensive.
- Jurisdictions required to prepare a Development Ready Land Inventory (DLRI) may be able to coordinate data collection efforts to support both the DLRI and the availability of existing infrastructure and as-built information for applicants.

Examples of successful implementation elsewhere/success stories

- **City of Portland/City of Lake Oswego:** The City of Portland's publicly available GIS portal ([Portland Maps](#)) and the City of Lake Oswego's publicly available GIS portal ([LOMaps](#)) are examples of good accessible public data. Both platforms allow users to search addresses, obtain

parcel information, and view zoning, planning, transportation, utility, aerial photography, and other geographic data layers within a single interface.

- **Clean Water Services (CWS):** Clean Water Services, the water and surface water management utility serving Washington County, provides a publicly accessible [GIS Web Map Tool](#) that allows applicants to locate and access sanitary and storm sewer infrastructure information, including main lines and maintenance holes, across its service area. By making this information available online before a predesign meeting or formal application, applicants can evaluate utility availability and identify potential infrastructure constraints earlier in the planning stages of the process.
- **Washington County:** Washington County's [Road Engineering As-builts Online](#) ArcGIS Map provides publicly available drawings of record for developments and road projects.

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1.5. Provide Guidance to Applicants on Middle Housing Land Divisions

Category: Local best practice, state agency support

Actor: Local jurisdictions: planning departments; State agencies: DLCD

Phase of development: All phases of development for Middle Housing Land Division (MHLD) applications.

Applicability: Applicable to jurisdictions subject to Oregon's middle housing requirements and middle housing land division provisions under [ORS 197A.420 to 197A.450](#) and [ORS 92.031](#), including jurisdictions required to allow middle housing and eligible middle housing land divisions under state law and administrative rules.

Description

Provide clear, accessible guidance for applicants describing available review pathways, sequencing options, and procedural requirements for MHLD applications. Guidance could include process flowcharts, consolidated application checklists, timelines, and explanations of how MHLD review coordinates with building permit, utility, frontage improvement, and final plat review processes.

This guidance should clarify when applicants may submit tentative MHLD applications relative to building permit applications, what approvals or conditions must be resolved at each stage of review, and when final plat approval is required prior to development or occupancy. Guidance may also identify common review issues, required supporting materials, and department responsibilities to help applicants better understand local procedures.

Why it helps

Middle housing land divisions are intentionally flexible so they can be used to divide properties that were previously developed with middle housing and properties being developed with middle housing at the same time as the land division. Recent state legislation reinforces this flexibility. [HB 2138](#) (2025) amends [ORS 92.031](#) to require cities and counties to allow an application for a tentative middle housing land division to be submitted before, after, or at the same time as building permit applications for the middle housing. It also clarifies that local governments may still require final plat approval before issuing building permits.

However, this flexibility also introduces complexity and, at times, confusion for applicants. Because middle housing, building permit, and land division reviews may occur in different sequences, applicants are not always clear on when materials must be submitted, which issues must be resolved before approvals can be issued, or how local departments coordinate review. Clarifying review options and sequencing requirements may also improve staff coordination. Clearer sequencing procedures may help reviewers navigate middle housing land divisions consistently across departments and review stages.

- **Survey findings:** In the survey conducted for this study, half of developers of plexes (duplexes, triplexes, quadplexes) reported that the sequencing of reviews for middle housing land divisions was occasionally or frequently a major issue. In addition, one out of four development reviewers reported the sequencing of reviews for middle housing land divisions was occasionally or frequently a major issue.

- **Focus group findings:** Stakeholders noted substantial variation in implementation across jurisdictions, making it more difficult for developers working in multiple communities to anticipate requirements and review processes.
 - Several participants suggested that clearer local guidance on sequencing, submittal requirements, and review procedures could improve predictability and reduce delays or issues later in the process.

Implementation considerations

- Best if paired with: [Update PWDS Related to Middle Housing, Final Plat Sequencing, Modernization of Final Plat Requirements](#), and [Standardization of Final Plat Requirements](#).
- **Guidance development requires cross-departmental coordination.** MHL D review involves planning, building, and public works departments, therefore, developing clear and accurate guidance requires input and buy-in from all relevant reviewing departments. Inconsistent practices across departments can undermine the usefulness of guidance if internal procedures are not aligned before guidance is published.
- **Guidance must be kept current as state law evolves.** Middle housing statutes and administrative rules have changed frequently in recent years, and guidance can quickly become outdated. Jurisdictions will need to commit to updating materials as new legislation takes effect, which requires ongoing staff capacity and attention.
- **Smaller jurisdictions may have limited capacity to develop and maintain guidance.** Producing process flowcharts, checklists, and written procedures takes staff time and expertise that smaller jurisdictions may not have readily available. DLCD has already developed several resources related to MHL D, including a model code and a sample application form and checklists. Additional resources from DLCD , such as templates for explainer handouts for applicants, could help further reduce the burden on individual jurisdictions.
- **Guidance alone may not resolve underlying coordination challenges.** In some cases, unclear sequencing reflects genuine gaps in how departments coordinate internally, not just a lack of written documentation. Jurisdictions may need to establish or clarify internal workflows alongside any public-facing guidance to ensure consistent implementation.

Examples of successful implementation elsewhere/success stories

- **City of Lake Oswego:** City staff supported the development team in the Hazelia Living case study to pursue MHL D with a concurrent subdivision, iteratively working through statutory updates together. Some of these conversations also included HAPO offering guidance to the City, as the City and development team worked through definitional interpretations in navigating this approach. Support from staff and HAPO to clarify process options was essential to the success of the project.

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1.6. Identify and Explain or Reconcile Differences Between Land Use and Building Code Terminology and Standards

Category: State agency action; local action

Actor: State agencies: HAPO: DLCD and BCD; local jurisdictions

Phase of development: Land use planning and building review

Applicability: All jurisdictions, and most housing types.

Description

Identify and explain or reconcile differences in key definitions and standards between local land use regulations, state statutes, and building codes. Examples may include differing definitions or measurement methods related to building height, floor area, or setbacks; difference between land use types and building code occupancy classifications; and definitions related to housing types such as townhouses and plexes.

Some of these differences can be reconciled—for example, jurisdictions can align local development codes with state building code approaches to measurement wherever possible, and check their zoning standards for potential conflicts with building code requirements. Other differences are more difficult to eliminate and may instead require explanatory materials for applicants and newer review staff. For example, differences between how housing types are defined under state statute compared to building code may be impossible or inappropriate to fully reconcile. Building code terminology is based on national model code language and updated every three years, making it difficult to align state building code with state statute or local definitions. In these instances, providing clear guidance that shows how the definitions relate can reduce applicant and reviewer confusion.

Colloquial terminology differences may also create confusion in communications and data tracking. For example, the Oregon Structural Specialty Code (OSSC) is often informally referred to as a “commercial” code (including on the [Building Codes Division website](#)) even though it applies to multi-unit and mixed-use projects considered “residential” from a land use perspective. This can make tracking data for multi-unit and mixed-use projects more challenging, because they may not be readily or consistently identified within permitting software. Changing how people refer to things in practice is challenging, but using precise terminology in official forms and providing guidance materials can help reduce confusion.

Initial efforts may occur at the state level through coordination between agencies such as the Oregon Building Codes Division (BCD) and Department of Land Conservation and Development (DLCD). State agencies can identify terminology conflicts, prepare crosswalks and interpretive guidance, and evaluate where statutory or code inconsistencies create barriers or confusion. Because many land use and housing definitions are established in state statute, long-term alignment may require legislative updates to clarify or reconcile terminology across regulatory systems. However, as noted above, full alignment may be neither possible nor desirable. Developing templates for permit applications or e-permitting frameworks that provide a smoother transition between building code terms/standards and land use terms/standards could also reduce issues related data input, processing, and reporting.

Local jurisdictions can also review and revise development codes, permitting systems and data fields, application materials, and guidance documents to improve consistency between land use and building review processes and reduce applicant confusion.

Why this helps

48% of housing producers noted that differences in land use and building codes posed major issues in the development process. Focus group participants also identified terminology inconsistencies as a recurring source of interdepartmental review challenges, duplicative review, and unexpected project costs.

Differences between land use and building code terminology can lead to conflicting interpretations, redesign, or delays later in the permitting process, particularly for housing types regulated differently across systems, such as middle housing and mixed-use. .

Improved alignment and clearer guidance can help reduce uncertainty, improve predictability during project review, support more consistent interpretation across planning and building departments, and lead to better data tracking. Clarifying terminology and review pathways may also help applicants better understand applicable codes, submittal requirements, and development standards earlier in the process.

- **Survey findings:** In the survey conducted for this study, 42% of producers cited differences in interpretation as a frequent challenge.
- **Focus Group findings:** Participants acknowledged the role interpretation plays in development review.
 - *"Terminology inconsistencies across departments causes interdepartmental review challenges. Multi-unit is defined one way for planning and another for building. For example, townhouses can be built using the residential code instead of the structural code. In one instance, land use was impacted and it resulted in additional fees to the applicant because the requirements across departments were inherently different."* (Building Official, Willamette Valley)

Implementation considerations

- **State statute and code constraints:** Many housing and land use definitions are established in state statute or tied to state building codes and cannot be modified solely through local administrative action. Long-term alignment would require directive for coordination between state agencies and corresponding legislative updates to reconcile conflicting terminology or definitions.
- **Differences in code update cycles:** Building codes are updated on a different cycle than local development codes, which may create ongoing administrative work for jurisdictions attempting to maintain consistency between regulatory systems over time.
- **Local code drafting considerations:** Many jurisdictions avoid directly incorporating external documents, such as state building codes, into local development code definitions because those external standards may change in ways that create unintended consequences or inconsistencies within the local code framework. As a result, aligning terminology may require jurisdictions to periodically update local code language to mirror relevant building code changes.

- **Administrative and guidance updates:** Some improvements may be achievable without legislative changes through updates to permitting terminology, application materials, review procedures, staff training, and applicant guidance documents that better explain how projects are classified and reviewed across systems.

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1.7. Provide Guidance on Review Processes for Manufactured, Modular, and Prefabricated Dwellings

Category: State agency action; local action

Actor: BCD; local governments

Phase of development: Land use, building, and inspections

Applicability: All jurisdictions.

Recommendation/Description

Develop clearer permitting guidance and application materials for prefabricated construction to help applicants understand the division of responsibilities between state-administered prefabricated structure programs and local jurisdiction permitting processes. This could include materials written for nontechnical audiences like bulletins, backgrounder documents, user guides, standardized submittal expectations, and clearer process mapping to reduce confusion, improve review efficiency, and lower permitting costs associated with factory-built housing projects.

In addition, expanding educational resources regarding manufactured housing and prefabricated structures could help applicants or reviewers who are unfamiliar with the terminology and nuances between these options. A 2024 "[Oregon Prefabricated and Modular Housing Model Code and Audit Workbook](#)," which provides guidance to local governments to update their land use regulations to remove barriers to prefabricated and modular housing, lays out distinctions between manufactured dwellings regulated under federal Housing and Urban Development (HUD) standards and prefabricated dwellings constructed to Oregon building code standards. However, additional guidance aimed at applicants may be helpful. The issue has less to do with the standards or statutes themselves and more to do with clarifying confusion and providing more information.

Why this helps

The installation and permitting of manufactured and prefabricated dwellings can be complex to understand, with multiple state and local codes, permitting pathways, and review authorities involved in a single project. Although prefabricated dwellings may seem similar to manufactured homes, they are regulated under different construction standards and permitting frameworks. Factory production of dwellings, or components thereof, can reduce construction costs, reduce construction waste, and shorten construction timelines.

Improved consistency in terminology, definitions, and permitting guidance could help applicants, builders, and jurisdictions better understand the regulatory distinctions between manufactured housing and prefabricated construction. Clarifying regulatory responsibilities and permitting pathways could reduce permitting delays and uncertainty for applicants and local reviewers.

Confusion between housing types, including interpretations of relocatability and eligibility for placement in manufactured dwelling parks, can create unnecessary delays, increase project costs, and complicate development review for applicants and jurisdictions. Implementation of updated manufactured housing

and manufactured dwelling park standards would require coordination across state agencies, local jurisdictions, and industry professionals.

- **Focus Group findings:** A number of focus group participants noted confusion regarding distinctions between manufactured housing, prefabricated structures, and modular construction, including uncertainty regarding applicable standards and the division of state and local permitting responsibilities.

Implementation considerations

- Considerations include the timing and frequency of code updates, alignment between state and local regulations, and ensuring clear distinctions between state-administered requirements and local land use authority.
- Helpful to combine with [Update Standards for Manufactured Dwelling Parks.](#)
- **Frequency of code updates:** Manufactured housing codes and related specialty codes are updated less frequently than other state building codes, which can result in standards that do not fully reflect current housing products, development practices, accessibility expectations, or local land use conditions.
- **State and local regulatory overlap:** In addition to state codes, many local jurisdictions have their own zoning and development standards related to manufactured housing. Differences between state code requirements and local zoning or development regulations can create confusion regarding applicable standards, permitting pathways, and review responsibilities.
- **Coordination across agencies and jurisdictions:** Updating state standards (if warranted) may require coordination among multiple state agencies, local jurisdictions, and industry professionals to ensure terminology, permitting procedures, and regulatory requirements are applied consistently across jurisdictions.
- **Clarification of state and local roles:** Implementation efforts should also clearly distinguish which elements are regulated at the state level, including factory construction standards and state-administered installation requirements, and which elements are regulated locally, including zoning, siting, infrastructure, and land use approvals.
- **Training and technical assistance:** Local jurisdictions may also require training and technical assistance to understand updated regulatory frameworks governing manufactured housing, prefabricated structures, and modular construction.

Examples of successful implementation elsewhere/success stories

- **City of Portland:** Portland has started to identify where design overlays may interfere with state-approved structures to review how the City can better facilitate modular construction during zoning approval.

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1.8. Clarify Requirements Related to Early Site Work

Category: Local best practice

Actor: Local jurisdictions: cities and counties

Phase of development: All phases of development

Applicability: All residential projects that require site work plan review. Particularly relevant for subdivisions and other developments involving substantial horizontal infrastructure or site preparation work prior to vertical construction.

Description

Permit requirements related to early site work activities that occur outside the traditional building permit and building code review process but are critical to public safety and right-of-way protection, such as erosion control, grading or fill permits, and dangerous building permits, should be clearly identified and explained to applicants. These permits are often essential to successful project mobilization and development sequencing, yet their requirements and applicability can be unclear without proactive guidance from the jurisdiction.

Requirements for these permits often vary substantially across jurisdictions, including when permits may be submitted, what approvals must occur first, and which departments are responsible for review and inspection. Jurisdictions can reduce confusion and delays by providing clear guidance on permit review authority, application requirements, conditions, and sequencing under which early site work may proceed prior to issuance of full building permits.

Clear and coordinated guidance across planning, engineering, public works, and building departments can help applicants better sequence development activities and avoid delays caused by uncertainty regarding permitting pathways or review responsibilities.

Why this helps

Unclear requirements related to early site work can create delays, redundant review processes, and uncertainty for applicants, particularly those working across multiple jurisdictions with differing permitting structures and terminology. Developers and consultants frequently report that requirements for grading permits, erosion control approvals, demolition permits, and other site preparation activities are difficult to identify early in the process and may not be well integrated into broader project review timelines.

Clarifying these requirements improves predictability and allows applicants to more effectively coordinate construction sequencing, financing, consultant work, and contractor mobilization. Earlier authorization of limited site work activities can also help projects align with seasonal construction windows for grading, utility installation, and erosion control work, reducing the likelihood that delays push construction into the next dry-weather season.

Providing clearer guidance regarding permit sequencing and review authority may also reduce unnecessary staff coordination burdens, minimize incomplete applications, improve consistency across departments, and ensure that improvements intended for future public dedication are built under proper

oversight. This can be particularly important for projects involving multiple reviewing agencies or state permitting requirements that depend on local approvals or signoffs.

Implementation considerations

- Best paired with [Site Work Permitting Concurrent with Land Use Review](#).
- **Interdepartmental coordination:** Implementation may require improved coordination between planning, public works, engineering, utilities, and building departments to ensure that permit sequencing, review timelines, and inspection responsibilities are consistently communicated to applicants.
- **Permit sequencing and communication:** Jurisdictions should clearly communicate which site work activities may occur prior to public works and building permit issuance and under what conditions. Guidance should identify required approvals, responsible departments, submittal timing, and inspection requirements for early site work permits.
- **Environmental and resource protection requirements:** Early site work authorization must not preclude compliance with applicable environmental regulations, land use conditions, natural hazard requirements, or resource protection standards. Projects involving wetlands, riparian corridors, steep slopes, flood hazard areas, habitat protection areas, significant trees, or other constrained lands may require additional review, mitigation measures, or final site design approval before grading or clearing activities can proceed.

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1.9. Transparent and Coordinated Permit Review

Category: Local best practice

Actor: Local jurisdiction, all reviewing departments/agencies

Phase of development: All phases, with early comment sharing generally most applicable to building and engineering permit reviews rather than land use review.

Applicability: All jurisdictions and housing types. Most beneficial for projects involving multiple reviewing departments or longer review timelines.

Description

Applicants consistently identified transparency throughout the permit review process as one of the most valuable ways to reduce uncertainty and improve project delivery. Jurisdictions should provide clear information to applicants on review status and share comments with applicants in ways that best support an effective response. This can include:

- **Status tracking:** Provide applicants with visibility into application status, reviewer assignments, completed reviews, and remaining review steps.
- **Comment consolidation:** Coordinate comments internally and proactively reconcile conflicting comments wherever possible. Applicants should not be expected to resolve conflicting comments between reviewers, departments, or bureaus. Providing complete comments during each review cycle, where practicable, also helps reduce subsequent review iterations and minimizes the introduction of new comments on elements that were previously reviewed.
- **Interim comment sharing:** Upon request, provide applicants with visibility into review comments as departments complete their reviews, rather than waiting until the entire review cycle is complete. Early access to comments allows applicants to decide whether to begin addressing issues while other departments continue their review. Because comments issued before completion of the full review cycle may be preliminary, jurisdictions should clearly communicate their status, and applicants should understand that comments may change if later reviews identify conflicts or require additional coordination.

Why this helps

Providing visibility into review progress reduces uncertainty, allows applicants to identify where a project is in the review process, and improves communication between applicants and reviewing agencies. Early access to comments allows applicants to decide whether to begin addressing issues while other departments continue their review. This can reduce idle time between review cycles, particularly when one department completes its review weeks later than others. At the same time, some applicants may prefer to wait for a consolidated set of comments before beginning revisions. Providing the option to access early comments gives applicants flexibility to decide whether the potential time savings outweigh the possibility that preliminary comments may change during later coordination.

- **Survey findings:** In the survey conducted for this study, over 60% of jurisdictions represented among development reviewers reported using transparency in review status, providing developers the ability to see what has been completed and comments to date.

- Conversely, 54% of developers reported that waiting for all reviews to be completed before comments were released was occasionally or frequently a major challenge.

At the same time, some applicants may prefer to wait for a consolidated set of comments before beginning revisions. Providing early comments gives applicants flexibility to decide whether the potential time savings outweigh the possibility that preliminary comments may change during later coordination.

- **Focus Group findings:** Several focus group participants spoke to this theme.
 - *"There is a lack of transparency and lack of accountability in the review process."* (Developer, Portland Metro)
 - *"Using ProjectDox has allowed applicants to see comments in real time without waiting for all reviews to be done. It is important to have software tied to the reviewers' needs."* (Engineer, Small City, Portland Metro)

Implementation considerations

- Jurisdictions use a variety of permitting software platforms with different capabilities. Implementation should focus on improving transparency rather than requiring a specific software solution. Many existing systems already support review-status tracking, automated notifications, or staged release of comments.
 - Software capabilities and existing workflows may limit the level of transparency that can be provided. Some jurisdictions may need to enable existing features, modify workflows, or invest in additional software functionality over time.
- If comments are shared before completion of a full review cycle, jurisdictions should clearly identify them as preliminary and or tentative, where appropriate and establish expectations regarding when comments become final.
- Jurisdictions implementing staged comment release should recognize that revisions made in response to one department's comments may occasionally require additional review by other disciplines.
- Internal coordination remains important to minimize conflicting direction. Where conflicts arise, reviewing departments should reconcile comments across reviewers, departments, or bureaus and provide applicants with a coordinated response rather than expecting applicants to determine which direction to follow.
- Best paired with [Discipline-Specific Coordination Meetings](#), [Cross Discipline/Department Coordination Meetings](#), [Structured Communication and Coordination with Outside Agencies](#), and [Engaging Contracted Reviewers](#).

Examples of process and implementation aligned with the goal of the recommendation

Public information on how jurisdictions provide transparency into comments during review administer permit review is limited, making it difficult to identify documented examples of this practice. The following example draws on the project team's professional experience to illustrate potential implementation approaches:

- **City of Portland:** Prior to the implementation of online permitting, Portland allowed applicants to respond to individual department comments as they were received, rather than waiting for all departments to complete a full review cycle before resubmitting. This approach enabled applicants to address comments incrementally and move permits closer to issuance while remaining departments finalized their review, reducing overall wait times and keeping projects moving forward during the review process.
 - Portland Permitting & Development staff noted that the **City of Portland's** recent transition to a consolidated documentation system that allows reviewers to see comments from other departments has helped reduce conflicting comments.

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2. Improve Reviewer Coordination and Consistency

2.1. Housing Development Project Coordinator

Category: Local best practice, State agency action

Actor: Local jurisdiction (planning/building/public works departments), state agencies

Phase of development: All phases

Applicability: This is particularly relevant for larger jurisdictions with more reviewers across multiple departments, and/or for projects with multiple state agency reviews. It can be beneficial for all housing types but is particularly helpful for larger or more complex projects, even those with statewide significance.

Description

Establish a project coordination function for residential development by identifying a consistent point of contact for applicants throughout the review process. Depending on the jurisdiction or agency, this function may be carried out by a dedicated project coordinator or development navigator, an existing staff member assigned to coordinate projects, or another staffing model appropriate to available resources.

The point of contact would help applicants navigate the review process, coordinate communication among reviewing departments and agencies, answer process questions, facilitate resolution of conflicting comments, and provide continuity from project initiation through permit issuance.

For projects involving multiple state agencies or projects of statewide significance, similar coordination functions could also be provided at the state level. State development specialists or project coordinators could assist with interagency coordination, permitting, entitlement, and other development readiness activities for priority housing projects, including state-owned lands intended for housing development.

Why this helps

A consistent point of contact or project lead can help applicants get clear information about the status of reviews and help resolve conflicts between departments. A consistent point of contact helps applicants understand where a project is in the review process, coordinate communication among reviewers, and resolve issues that span multiple departments or agencies. This can reduce uncertainty, improve coordination, and help identify problems earlier in the review process.

At the state level, project coordination can also improve collaboration across agencies and help advance priority housing projects by reducing duplication, facilitating permitting, and supporting development readiness activities.

Both developers and local jurisdiction staff suggested such a position or role could help ease the development review process by reducing uncertainty and potentially shortening review times.

- **Survey findings:** In the survey conducted for this study, 52% of reviewers and 64% of producers cited a lack of clarity in the review process as a major burden in the development process.

- **Focus group findings:** Several focus group participants raised this topic.
 - "Projects can benefit from having a consistent point of contact throughout all phases of review. Cities recognize the value of this role; however, staff capacity and funding constraints make implementation challenging. Despite these barriers, cities are continuing to explore ways to provide this level of coordination in response to developer requests." (Planner, Willamette Valley)
 - "From start to finish, you interface with hundreds of people, and every agency is different. Public works, planning, and building all operate in separate silos, and while each delay may seem incremental, cumulatively they add up and slow projects down. What's needed is a permit coordinator or single point of contact who can connect the dots, track where permits are in review and help navigate the process. Time is important in every single project, and having one person who understands the full picture would help streamline the process significantly." (Developers, Eastern Oregon and Portland Metro)
 - "I worked with a City that had someone in their engineering department who was moving the project forward—taking ownership, keeping track of the permit, providing updates, and reaching out to outside agencies. That made all the difference." (Developer, Portland Metro, Central Oregon, and Oregon Coast)
 - "Planning staff see their role as protecting the code instead of making projects work. We want to be partners with municipalities. One accountable coordinator across city departments for approvals on housing developments would help. The longer things take and the more standards are set, the less affordable housing becomes." (Developer, Portland Metro)
- **Case study findings:** The development team of Jackstraw perceived this feature as a benefit in the City of Bend, even though staff had mixed opinions regarding how the program was implemented. Meanwhile, the development team of Gooseberry Trails suggested having one staff member in charge of reviewing and reconciling comments from different departments could have reduced the conflicting feedback that created so many challenges during the development process.

Implementation considerations

This recommendation focuses on providing a project coordination function rather than prescribing a specific staffing model. Jurisdictions may assign this responsibility to an existing employee, dedicate a development navigator or project coordinator, or incorporate the function into another role based on local capacity and workload.

- **Requires additional local staffing and funding:** Dedicated coordinators may provide the greatest benefit for jurisdictions with larger development volumes or more complex review processes, but they also require additional staffing and funding. Smaller jurisdictions may be better served by assigning coordination responsibilities to existing staff or sharing resources across departments.
- **Opportunity for State Agency Assistance and Implementation:** For priority housing initiatives or projects involving multiple state agencies, Oregon could consider dedicated state development specialists or project coordinators to assist with development readiness, entitlement, permitting,

and interagency coordination. Such roles could help reduce consultant costs, improve consistency, and accelerate delivery of state-supported housing projects.

Examples of successful implementation elsewhere/success stories

- **Recent Legislation in Washington State:** Washington State recently passed legislation (HB 2418, 2026) to require local governments to designate a single point of contact for residential permit applications to improve coordination and reduce administrative delays.¹⁴
- **City of Bend:** The City of Bend created a project coordination role to help support complex residential developments through permitting and review. The case study done on the Jackstraw Development found that the development team viewed the role as valuable to developers.

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¹⁴ Washington State Department of Commerce. 2026 Legislative Update.
<https://www.commerce.wa.gov/planners-newsletter-legislative-update-2026/>

2.2 Structured Communication and Coordination with Outside Agencies

Category: State action

Actor: HAPO and state agencies

Phase of development: Land use, building, public improvements

Applicability: All jurisdictions and housing types; could apply to certain unit threshold

Description

Housing producers and local governments could benefit from a single communication point to interface with state agencies, special districts, and other non-local entities. HAPO currently plays a role in navigating the process on behalf of local governments and developers.

See the Evaluation of State Policies and Programs on Housing Production Study for additional details on implementation of this recommendation.

Why this helps

Navigating state agency and special district reviews often slows down the pace of approval while local governments await state agency review which add time and cost. A key part of HAPO's role as established in SB 1537 is serving as a resource to applicants and coordinating agencies involved in the housing production process.

State agencies are not held to local review timelines. Convening a pre-application-like process with state agencies, developers and staff could allow for early conversations around potential issues. In addition, structured communication with state agencies could allow for regular opportunities to connect with the right staff who are focused on housing-related issues.

- **Focus group findings:** This topic was raised in focus groups.
 - "Better coordination across reviewing departments and agencies" (developer response when asked what one thing they would change about the development review process)

Implementation considerations

Several state agencies have existing related roles:

- Regional Solutions staff have played a role in navigating complex challenges in the past. Currently, housing producers and local governments are unclear on the role of HAPO v. Regional Solutions.
- HAPO provides navigation assistance to housing producers upon request, and has been able to engage with anyone requesting assistance to this point. HAPO staffing and workloads may become a limiting factor if the volume of requests for assistance increase.
- The Oregon Centralization Application (ORCA) Early Engagement group is made up of a variety of State agencies that touch housing development. As projects move through the ORCA process, the group of State agencies are informed of the projects and have the opportunity to flag for potential issues that may exist. These issues could range from infrastructure, wetlands, historic preservations and more. This group is a process-based group that provides visibility to the State

enterprise based on OHCS-funded projects. This group differs from Regional Solutions in that it is internally driven and cyclical in its process. HAPO helps to facilitate this group.

- HAPO serves as an interface with state agencies – the connection to special districts is not as natural but could be cultivated.

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2.3 Discipline-Specific Coordination Meetings

Category: Local best practice

Actor: Local jurisdiction: land use planning / public works / building departments

Phase of development: All phases

Applicability: This is particularly relevant for larger jurisdictions with multiple reviewers within a given review department. It can be beneficial for all housing types.

Recommendation/Description

Regular team meetings where staff within the same discipline or department discuss active projects, align on common interpretations of regulations, share updates (e.g., recent or upcoming changes to regulations), and troubleshoot challenging review issues collaboratively.

Why this helps

Coordination meetings improve certainty and predictability for applicants by aligning reviewers within a department on consistent interpretations and a common understanding of the regulations. For planning staff, these meetings can help align current and long-range planning efforts, prepare teams for upcoming ordinance changes, and provide opportunities to engage legal counsel on complex applications to ensure consistent and defensible code interpretation. Similar coordination among engineering, building, and permit review staff supports more predictable review outcomes and strengthens internal consistency across projects.

- **Survey findings:** In the survey conducted for this study, 54% of housing producers expressed that different interpretations posed a major issue or challenge in the development process.
- **Focus group findings:** This topic was raised in the focus group.
 - *We document our code interpretations so staff have a consistent reference point when questions come up again. Larger jurisdictions hold weekly or monthly interpretation meetings to make sure everyone is on the same page.* (Planners from multiple cities statewide)

Implementation considerations

- Helpful to combine with [Cross Discipline/Department Coordination Meetings](#).
- The decision-maker to resolve differences of interpretation can make a difference in how strict or flexible those interpretations are. If the decision-maker has a goal to support housing production, this can help ensure this perspective is consistently reflected in interpretations and staff reviews. However, in the absence of such leadership, one strict or conservative interpretation can prevail and set the standard for all reviewers.

Examples of successful implementation elsewhere/success stories

- **Bend, OR:** Representatives from the Building Safety Division shared that the division has meetings to review how staff can best interpret building code to respond to local climate characteristics. These meetings may also include building code reviewers from other neighboring jurisdictions to align regional best practices.

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2.4 Cross Discipline/Department Coordination Meetings

Category: Local best practice

Actor: Local jurisdiction, planning/ building/ public works departments

Phase of development: All phases

Applicability: This is particularly relevant for larger jurisdictions with more reviewers across multiple departments. It can be beneficial for all housing types but is particularly beneficial for complex projects.

Description/Recommendations

Cross-department coordination meetings provide a forum for staff from different functional areas, such as planning, engineering, and building, to discuss specific development applications during review or in advance of pre-application conferences. During development review, these can provide a venue to reconcile conflicting standards or requirements and clarify areas of intersection between reviewers' scopes.

Why this helps

These meetings can help departments proactively reconcile conflicts between definitions or standards across departments and can avoid delays and expense for the applicant as they try to navigate the conflicts through iterative design revisions.

- **Survey findings:** In the survey conducted for this study, 53% of producers noted that a lack of clear standards posed major burdens to the development process.
- **Focus Group findings:** Several focus group participants raised this topic:
 - *"Hit them early. We don't want applicants going back and forth with a lot of comments, but we often catch things in those internal coordination meetings that make them worthwhile."* (Planner from Willamette Valley, Large City)
 - *"Various departments talk to each other but they only care about their department. There is no one person to go to to resolve the issue - the conflicts between departments are just left to the developers to figure out."* (Developer, Portland Metro)
 - *"We lost two years and a lot of money because of a discrepancy between departments on the capacity of a site."* (Developer, Portland Metro)
- **Case study findings:** When one department is unaware of the requirements of another department, or provides inconsistent guidance, the applicant is left trying to resolve conflicting requirements between departments. This was a common theme in the public engagement efforts (both surveys and the focus group comments) as well as in the Gooseberry Trails case study, where conflicting guidance on the multi-use trail width between Portland Bureau of Transportation (which was concerned with accessibility) and the Bureau of Development Services (which was concerned with preserving trees) delayed the project. According to the development team, this ultimately helped reduce the affordability levels of these income-restricted homes.

Implementation considerations

- **Prompt communication supports efficient review.** Timely feedback from the staff member assigned to a permit or application can help applicants resolve questions and address issues before they affect the review timeline. When appropriate, brief discussions between the assigned reviewer and the applicant may be more efficient than written correspondence alone, while broader coordination meetings remain appropriate for cross-department issues.
- Helpful to combine with [Discipline-Specific Coordination Meetings](#).

Examples of successful implementation elsewhere/success stories

- **City of Hermiston:** City staff indicated that involving all relevant city staff in meetings with applicants early in the process helps make the process smooth for projects like Upland Meadows.

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2.5 Engaging Contracted Reviewers

Category: Local best practice

Actor: Local jurisdiction, all departments (if applicable)

Phase of development: All phases (if applicable)

Applicability: Primarily small jurisdictions but can apply to larger jurisdictions during busy periods. Can apply to any housing type.

Description

For jurisdictions that use contracted reviewers, establish clear coordination processes early, provide access to permit review systems and project information, and maintain consistent reviewer engagement throughout the project review process.

Why this helps

Third-party external contracted reviewers could be a way to increase the reviewing staff's capacity. These arrangements can provide flexibility to scale up as needed, preventing the jurisdiction from having to hire full-time staff when capacity needs ebb and flow. Public engagement—both surveys and focus groups—often discussed the challenge of staff capacity in smaller jurisdictions.

Implementation considerations

- A caution, and potential unintended consequence in implementing this recommendation, is whether these external contracted reviewers are billing hourly and may be disincentivized to move quickly or work efficiently. This could unintentionally drive up the cost of review.
- Third-party external contracted reviewers will need detailed knowledge of the local jurisdiction's processes, rules, and regulations (if reviewing land use or public improvements) or the building code (if reviewing building permits).
- If the jurisdiction has worked to increase consistency in interpretation among different staff reviewers (such as through [Discipline-Specific Coordination Meetings](#)), communicating those interpretations to any third-party reviewers is important to maintain consistency.
- If jurisdiction staff will be inspecting work on permits reviewed by a third-party reviewer, staff may have less context for why certain decisions were made and may feel less comfortable approving what was permitted.
- Sharing reviewer capacity among jurisdictions, as described in [Share Staff Capacity Across Jurisdictions](#), can provide an alternative to expand local staff capacity.

Examples of successful implementation elsewhere/success stories

- **City of Bend:** To meet compliance with required timelines for expedited permitting review of developments that include affordable housing, Bend maintains contracts with third-party plan review agencies. When staff do not have the capacity to provide the reviews within the required timeframe, they utilize those contracts.

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3. Expand Options for Concurrent Review

3.1 Final Plat Review Sequencing

Category: Local best practice

Actor: Cities and counties

Applicability: Local Jurisdictions: cities and counties

Phase of development: Land use, public infrastructure review, and county surveyor review of final plats

Description

Identify opportunities to allow more concurrent reviews tied to final plat steps. In some jurisdictions, portions of final plat review, address assignment, county surveyor review, utility coordination, and other administrative activities occur concurrently, while in others applicants cannot submit final plats to the county surveyor or begin related review processes until all city approvals are complete, including final engineering or construction document approval. Areas to evaluate for potential concurrent review include:

- Final plat review by city staff and county surveyor staff at the same time
- Address assignment during final plat review
- Parallel review of final construction documents and final plat materials
- Early coordination related to recording requirements, bonding, or utility approvals

Why this helps

In some communities, sequential final plat review processes may extend project timelines when administrative review activities cannot begin until earlier steps are complete. Where concurrent review is feasible, it may reduce idle time between review activities, improve coordination between jurisdictions and county surveyors, and provide applicants with greater predictability. The appropriate sequencing will vary based on local procedures, county practices, and statutory requirements.

- **Survey findings:** In the survey conducted for this study, 40% of developers reported that delays in the final plat review were occasionally or frequently a major issue.
- **Focus Group findings:** Several focus group participants reflected on this topic.
 - Participants noted that sequential final plat review processes can extend project timelines even when remaining review items are minor or largely procedural.
 - Participants also pointed out that delays associated with final plat sequencing may have a disproportionate impact on smaller subdivision projects or projects with limited infrastructure improvements, where extended timelines can significantly affect financing, construction scheduling, or project feasibility.

Implementation considerations

- **Coordinate with county surveyors:** Cities and counties may benefit from jointly reviewing local final plat sequencing practices to better understand which review activities are driven by statutory requirements and which reflect local administrative procedures. Additional discussion

among jurisdictions, county surveyors, and other practitioners could help identify opportunities for improved coordination while maintaining existing legal and survey review requirements.

- **Update internal review procedures:** Jurisdictions may need to update internal review procedures to allow activities such as addressing, engineering review, and final plat review to occur in parallel rather than sequentially.
- **Clarify recording requirements and sequencing:** Clear guidance on required approvals prior to plat recording can help avoid confusion while still allowing earlier review steps to proceed.
- **Consider additional study:** Further evaluation with cities, counties, county surveyors, and other practitioners could help identify best practices, document successful coordination approaches, and determine where opportunities exist to improve review sequencing without compromising review quality or statutory responsibilities.
- Best paired with [Modernization of Final Plat Requirements](#) and [Standardization of Final Plat Requirements](#).

Examples of successful implementation elsewhere/success stories

- **City of Happy Valley/City of Hillsboro:** Each city allows for submitting the final construction documents and final plat at the same time.
- **City of Eagle Point:** Does concurrent review with city staff and the county surveyor for final plats.
- **City of Hermiston:** Allows development to move forward before the final plat is recorded.
- **City of Bend:** Defined three processes to decrease the timeline between when a subdivision is approved and when building permits can be issued for construction on the new lots.¹⁵

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¹⁵ City of Bend Community Development Department. "Residential Land Divisions Early Actions Program (Stemming from House Bill 2306)." Memorandum from Russ Grayson, Development Services Director, February 27, 2020. Accessed June 1, 2026. <https://www.bendoregon.gov/wp-content/uploads/2025/12/HB2306-External-Memo.pdf>

3.2 Performance Bond and Substantial Completion for Public Improvements

Category: Local action

Actor: Local jurisdiction, public works departments

Phase of development: Public improvements

Applicability: All jurisdictions. Particularly relevant for subdivisions.

Description

Expand options for final work on public improvements that are not essential to public health or safety to be secured (e.g., by a performance bond) rather than fully constructed prior to plat recording. Public improvements generally must be "substantially complete" before a plat can be recorded, though state legislation HB 2306 (2019 session) precludes jurisdictions from withholding building permits if public improvements are substantially complete (ORS 455.175). This can include inspection, testing, and acceptance of key improvements such as water supply, fire hydrants, sewage disposal, stormwater drainage, curbs, emergency-response street signs, emergency access roads, and off-site improvements needed to serve the subdivision.

This option should be limited to improvements that do not affect health and safety, emergency access, utility service, stormwater function, or water quality compliance, such as seasonal plantings, minor punch-list items, or work controlled by a private utility provider.

Why this helps

More flexible versions of substantial completeness and greater reliance on performance bonding can help reduce development delays due to supply chain issues, seasonality of construction and planting, and other factors beyond the applicant's control. Requiring minor punch-list items for public improvements to be completed before a plat can record or occupancy can be allowed can delay projects at a critical stage after substantial time, effort, and capital have already been invested. For land developers, recording the final plat is often the last step before buildable lots can be sold to homebuilders and project costs can be recovered. Delays at this stage can increase carrying costs, extend financing timelines, reduce returns, and slow delivery of housing-ready lots.

- **Focus Group findings:** Focus group participants reflected on this topic.
 - "We audited our own permits from the past four month—42% were approved in the first round within 10 days and then had to sit for six months waiting for the plat to be recorded because of finishing touches on infrastructure." (Engineer, Large City, Willamette Valley)
 - "We were delayed on getting sign-off on our final plat because the drain cleanouts needed a concrete color surround around them—which needed to get ripped out anyway because of new sidewalks going in." (Developer, Central Oregon)

Implementation considerations

- The existing legal framework clearly distinguishes between low-risk items that can be financially secured and core improvements that must be completed before plat recording, permit issuance, or occupancy. This distinction is important to retain so it is clear that improvements needed for public health or safety are completed at least prior to occupancy.

- Bonds or other guarantees should be large enough to cover completion, contingency, administration, and enforcement costs. This will likely mean jurisdictions would need to require bond amounts of 125%, 150%, or more of the developer's estimated cost.

Examples of Successful Implementation Elsewhere/Success Stories

- **City of Salem:** Focus group participants described Salem's use of a no-build improvement agreement and a reported 200% financial security requirement for certain remaining public improvements, such as street signs and manhole lids. This approach allows building permits to proceed once public improvements are substantially complete while ensuring outstanding punch-list items are completed under financial assurance.

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3.3 Concurrent Land Use, Building, and Public Improvement Reviews for Non-Land Division Projects

Category: Local action, potential legislation

Actor: Local government

Phase of development: All phases

Applicability: Concurrent reviews for land use and building permits may be most valuable for multi-unit housing. Concurrent reviews for building permits and public improvements may be most valuable for infill projects where infrastructure requirements are well understood early in the process.

Description

For non-land division projects, jurisdictions can offer applicants the option to proceed with concurrent reviews across development phases at the applicant's own risk and expense. This can include reviewing public improvements plans in parallel with land use or building permits or accepting building permit applications during the appeal period following a land use decision. Allowing concurrent review does not eliminate the need for each phase of review to be completed; rather, it enables applicants to advance multiple workflows simultaneously, reducing overall project timelines. If a land use decision is appealed or a permit is denied, the applicant bears the risk of work completed during concurrent review. Jurisdictions may implement concurrent review as an optional pathway available upon applicant request or may establish it as a standard practice for certain project types. Many developers have expressed a preference for the time savings associated with concurrent reviews, but some may be more risk-averse and prefer to advance one stage at a time to avoid duplicating efforts if changes are required.

Jurisdictions can offer applicants the option to proceed at their own risk and expense with concurrent reviews. Allowing concurrent review can include:

- **Public improvements with land use or building:** Reviewing public improvements plans in parallel with land use, site development (e.g., grading, erosion control), or building permits
- **Building and land use:** Accepting building permit applications during the appeal period for a land use review

Why this helps

Allowing more elements of the development review process to occur simultaneously can speed up the development process.

Implementation considerations

- Applicants take the risk of needing to update multiple sets of plans if one of the reviews requires.
- Can be less efficient for the jurisdiction if elements must be reviewed multiple times due to a change in a different scope.

Examples of successful implementation elsewhere/success stories

- **Sacramento County, CA:** Sacramento County's Concurrent Plan Review Program helps streamline post-entitlement reviews for eligible projects by allowing concurrent review of building

permits, grading permits, civil improvements, maps, and technical studies:

<https://development.saccounty.gov/us/en/concurrent-plan-review-program.html#gsc.tab=0>

- **Hermosa Beach, CA:** Hermosa Beach offers concurrent review of land use, building, and public works permits as the default:

<https://www.hermosabeach.gov/our-government/city-departments/community-development/building-safety-division/building-safety-application-submittal-process>

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3.4 Site Work Permitting Concurrent with Land Use Review

Category: Local best practice / Local action

Actor: Local jurisdictions: land use and public works departments

Phase of development: Planning and Engineering Review

Applicability: All residential projects that require site work plan review. Particularly relevant for subdivisions and other developments involving substantial horizontal infrastructure or site preparation work prior to vertical construction.

Description

Allow applicants to submit and begin review of site work and construction-related plans concurrently with land use review, rather than waiting until after land use approval is complete. Concurrent review may include review of grading plans, public works permits, erosion and sediment control plans, utility plans, stormwater infrastructure, and DEQ 1200-C permit-related materials.

This approach allows jurisdictions to begin technical review of site development and infrastructure plans earlier in the process while maintaining the requirement that final permits or construction authorization are not issued until land use approvals are finalized. Concurrent review may occur across planning, public works, engineering, utilities, and other reviewing agencies.

In some cases, applicants may also need a local Land Use Compatibility Statement (LUCS) or similar jurisdictional sign-off to proceed with state permitting processes, such as DEQ permitting. Earlier coordination and concurrent review can help applicants move those permitting processes forward sooner.

Why this helps

Concurrent review of site work and construction plans can significantly reduce overall development timelines by allowing technical review processes to proceed in parallel with land use review rather than sequentially. Developers and consultants identified this as a common request because grading permits, public works permits, erosion control review, and related infrastructure plan review can each take several months independently.

This issue is particularly important for developments involving substantial horizontal infrastructure work, such as subdivision projects. Construction timing is heavily influenced by seasonal weather conditions, especially for grading, utility installation, and erosion control work. Without some level of concurrent review, projects may need to secure land use approval by late fall or early winter in order to begin construction during the summer dry-weather season. Delays in one review process can push projects into the next construction season, increasing carrying costs, extending project schedules, and affecting project feasibility.

Concurrent review can also help applicants begin related state permitting processes earlier. For example, applicants may need a LUCS or other local jurisdiction sign-off before DEQ permits, including 1200-C erosion control permits, can proceed. Earlier coordination and review can reduce delays associated with waiting for sequential approvals across multiple agencies.

This approach may be especially beneficial for projects without significant environmental constraints, where technical review can proceed with lower risk of major redesign resulting from unresolved natural hazard, habitat, wetland, or mitigation requirements.

Implementation considerations

- Concurrent review may be most appropriate for projects on sites that do not involve natural hazard areas, wetlands, riparian corridors, habitat protection areas, or other environmentally constrained lands. Projects involving these site conditions may still require environmental review and mitigation requirements to be resolved earlier in the process to ensure that grading, infrastructure, and site design plans appropriately incorporate required protections and mitigation measures.
- Applicants pursuing concurrent reviews assume the risk that land use review could require substantial project changes. If significant revisions result from the land use process, applicants may need to revise engineering or site work plans, resubmit materials, or repeat portions of technical review. Jurisdictions should clearly communicate that concurrent review does not guarantee land use approval or limit the potential for redesign during entitlement review.
- Some state permitting processes, including DEQ erosion control and I200-C permitting, may require a Land Use Compatibility Statement (LUCS) or similar local jurisdiction sign-off before permits can move forward. Delays in local review or issuance of required land use compatibility documentation can delay downstream state permitting and compress available construction timelines. Jurisdictions may reduce delays by indicating whether the proposed land use for the project is allowed rather than waiting to provide the LUCS until the project has received land use approval.

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4. Capacity Building and Technical Assistance for Jurisdictions

4. Share Staff Capacity Across Jurisdictions

Category: Local best practice

Actor: Local jurisdictions, DBCS (BESA Program)

Phase of development: All phases

Applicability: This affects jurisdictions of all sizes but may be particularly challenging for smaller cities that do not have adequate staffing capacity or in-house technical expertise to support all review functions independently. The need for shared capacity may also vary depending on how infrastructure and development review responsibilities are organized across cities, counties, utilities, and other service providers.

Description

To address staff capacity challenges, jurisdictions may participate in state-level or local agreements that allow jurisdictions to share review staff, technical expertise, and permitting capacity across agencies.

At the state level, jurisdictions may participate in Oregon's [Building Evaluation Support Agreement \(BESA\)](#), which allows participating jurisdictions to share plan review and inspection capacity and workload demand with other participating jurisdictions. Rather than entering into multiple intergovernmental agreements with individual jurisdictions, local jurisdictions can opt into the statewide BESA program to access additional review support. As of 2025, 46 cities and counties participate in the BESA program.

Jurisdictions may also establish local or regional intergovernmental agreements to share staff capacity, specialized expertise, or review functions across agencies.

Why this helps

By statute ([ORS 455.210](#)), local governments fund building officials and plan review functions through permit fees. Many jurisdictions similarly rely on fee-supported models to fund planning and development review staff. Because development activity fluctuates over time, jurisdictions often struggle to maintain staffing levels that consistently match permit demand. Sharing staff capacity across jurisdictions can help local governments respond more flexibly to fluctuations in workload, reduce review bottlenecks, and maintain review timelines.

- **Focus group findings:** Participants spoke to multiple elements of this topic:
 - Some described staffing shortages, recruitment challenges, and uneven workloads as common barriers affecting permit review timelines.
 - Others noted that smaller jurisdictions may have difficulty maintaining in-house expertise for specialized review functions, while larger jurisdictions may experience temporary surges in permit volume that exceed available staff capacity. For example, one city stated that they rely on the county for utility, residential, and electrical reviews because of the complexity of the code requirements and the difficulty of maintaining that expertise in-house.

- Participants described jurisdictions entering into intergovernmental agreements or informal partnerships to provide temporary staffing support or specialized technical review services, such as utility, residential, or electrical review. These arrangements can help jurisdictions access expertise that may otherwise be difficult to recruit or retain locally.

Implementation considerations

- BESA is seen as a success story because of the network effects of more cities and counties opting in. The cyclical nature of development may still affect available capacity.
- A resource-sharing system similar to BESA could be extended to land use reviewers, but this is more difficult because local codes differ whereas the state code is consistent. Some MPOs serve a central land use role.

Examples of successful implementation elsewhere/success stories

- [Building Evaluation Support Agreement \(BESA\)](#) is perceived as a success story at the state level for sharing building official and inspector capacity across participating jurisdictions.
- Councils of Governments like [Lane Council of Governments \(LCOG\)](#) and [Cascades West Council of Government](#) offer fee-for-service shared capacity to review land use applications for smaller cities.

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4.2 Simplify and Support Local Implementation of Housing-Related Legislation and Rulemaking

Category: State action; legislation

Actor: DLCD, DCBS, legislature

Phase of development: Primarily land use

Applicability: This is particularly important to small cities with limited staffing but was reflected across all cities, regions, and housing types. Recent legislation has applied mostly to cities over 10,000 but some bills apply to cities over 2,500 as well.

Recommendation/Description

Local governments have struggled to keep their codes up to date and staff trained in the quantity and complexity of recent legislative and rulemaking changes. The last several years have required many separate development code updates. While the legislature and DLCD have generally provided funding and technical assistance for local implementation, there may be more that the legislature, DLCD, and other state agencies could do to support local governments in meeting new requirements.

Potential measures at the legislative level that could help include:

- Providing clear dates for adoption with adequate time to adopt. Consolidating legislative deadlines for required updates (e.g., one batch of updates per biennium) could further streamline the local adoption process for regulatory updates.
- Prioritizing cleanup legislation where needed to reconcile unintended conflicts or discrepancies between recent bills, and/or relying more heavily on agency rulemaking processes.
- Documenting legislative intent where possible to support interpretation where bill language may be unclear to the implementing jurisdictions.

DLCD, along with BCDS or other agencies, could support this effort by continuing to provide, or expanding upon their efforts to :

- Maintain up-to-date summaries of all recent housing legislation that requires updates by local governments with required implementation dates.
- Provide technical assistance through housing assistance grants and webinars.
- Develop model code modules that can be directly applied or applied by reference for housing law implementation.

Why this helps

This will help cities ensure that staff are trained on development code effectively and reduce the amount of staff time devoted to iterative code updates required by legislation. In smaller jurisdictions where the same planners are working on code updates and reviewing development applications, reducing time spent on code updates can directly increase the staff time available for development review.

- **Survey findings:** In the survey conducted for this study, 66% of development reviewers reported that rapidly changing state requirements was occasionally or frequently a major issue. Reviewers reported how staff capacity is often diverted from reviews to work on code updates to align with state legislation.

- **Focus group findings:** Local governments provided examples of difficulty in implementing state-mandated development code changes and keeping their staff up to date for development reviews. Several also provided examples of trouble keeping up with various adoption dates within different legislative bills.

Implementation considerations

- The legislature chooses which bills to advance and how often to advance these. Though the legislature has historically adopted more significant legislation in odd years rather than short sessions, recent sessions include substantive bills in short sessions as well.
- There may be pressure on lawmakers to see changes implemented as quickly as possible, making delaying effective dates for new legislation politically challenging.
- Recent legislation has caused some inconsistency; some cleanup bills are needed to ensure that guidance is direct and accurate.
- DLCD lacks staff and financial capacity to provide the level of technical or financial assistance that is needed .
- DLCD cannot interpret legislation directly without rulemaking. Ensure legislation is sufficiently clear to support implementation and provide additional clarity and precision through more ministerial administrative pathways, such as the rule adoption of model codes implementing new statutes.
- DLCD and HAPO are constrained in their ability to give legal advice to cities.

Examples of successful implementation elsewhere/success stories

- **DLCD Regional Representatives** help small cities understand legislative changes.
- **DLCD regional meetings** are helpful for informing cities about recently adopted rules.
- **Housing Model Codes for Small, Medium, and Large Cities** provides statutory modules that can be adopted by reference or applied directly under administrative rules.
- **Advance rulemaking, model code development, and implementation timelines** can support more effective implementation. For example, the original middle housing legislation was accompanied by rulemaking and model code development well in advance of implementation deadlines, giving jurisdictions time to evaluate the model code and prepare local code updates before compliance was required. Similarly, implementation of the Climate-Friendly and Equitable Communities (CFEC) rules included a process for requesting alternative compliance dates, providing additional flexibility for jurisdictions that needed more time to implement the new requirements.

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4.3. Staff Training

Category: State action; local action

Actor: Local jurisdictions; DCBS; DLCD; League of Oregon Cities

Phase of development: Land use, public improvements, building permit

Applicability: all jurisdictions and especially small cities

Description

Actors at many stages in the development process lack familiarity or training to understand roles and expectations. For example, the planning commission and city council may lack training in the land use, building, and infrastructure processes. At a staff level, local planners may need training to keep up with recent state level legislative updates.

There are several existing training programs:

- **Building Codes Division (BCD) Training Programs:** BCD operates a Training Program devoted to training and certifying building code professionals in Oregon, including building officials, inspectors, and plans examiners. Classes are primarily offered virtually and have served an average of approximately 200 students per year between 2023 and 2025.
- **Chemeketa Community College and Portland Community College** provide training and certification pathways for building permit technicians, plans reviewers and inspectors. These programs also offer associate degrees as a student option.
- [The League of Oregon Cities](#) and [Association of Oregon Counties](#) support training in land use for member jurisdictions, with a focus on elected officials.

Additional potential training opportunities could include:

- **DLCD or HAPO** could offer additional training and webinars for local planners to understand recent legislative updates.
- **DCBS** could look to training programs in other states to provide deeper training.

Why this helps

Better training at all levels makes the process timelier and reduces the number of reviews and thus cost.

- **Focus group findings:** Participants noted several challenges with training elected officials and land use/building official staff.
 - "Staff training on newly adopted legislative changes may help with process/procedures delays, staff training on proportionate exactions, better pre-app notes that lead to less incompleteness letters may also help." (Planner, Portland Metro, and Statewide)
 - "ORSC, and OSSC requirements have increased dramatically, including the energy code (ASHRAE)—it is much more complex, and it adds to review timelines and limited staff exposure and capacity. The energy code, in particular, burns timelines on reviews. Plans examiners need additional training to understand mechanical systems in residential reviews as well as commercial." (Building Official, Portland Metro)

- "The pace and volume of legislative change creates real challenges for staff training and retention of knowledge. Each update requires retraining, and by the time staff have absorbed one change, another is underway. While expanding housing options is beneficial, the cumulative complexity can make it difficult for both staff and applicants to navigate what is available and what applies to a given project." (Planner, Portland Metro)
- **Case study findings:** The development team of Upland Meadows shared that the experience and institutional knowledge of long-tenured staff at the City of Hermiston helps support a more efficient and predictable development process.

Implementation considerations:

- **Recruiting and retaining plumbing and electrical inspectors presents particular challenges.** Unlike structural and mechanical inspectors, plumbing and electrical inspector certifications are based on professional experience and licensure rather than testing alone, meaning qualified candidates typically come from the construction trades where wages are often higher than what building departments can offer. As a result, some jurisdictions have been unable to hire qualified inspectors locally, and BCD is currently providing commercial electrical inspection coverage for multiple counties to fill that gap. Any effort to expand training capacity will need to account for these recruitment and compensation challenges alongside training program development.
- Expanding training will require an investment in state resources to offer additional training opportunities.
- Staff capacity will limit the opportunity to expand training.

Examples of successful implementation elsewhere/success stories:

Washington State:

- Similar to Oregon's Department of Land Conservation and Development (DLCD), the [Washington State Department of Commerce](#) provides statewide technical assistance, guidance, training, and implementation support to local governments on land use planning, housing, permitting, infrastructure, and Growth Management Act (GMA) compliance. Commerce develops guidance documents, model code resources, funding programs, webinars, and training materials to help local jurisdictions implement new legislation and respond to state planning requirements. Commerce also plays an active coordination role between state agencies and local governments by providing implementation guidance following major legislative changes, convening local government staff, and supporting jurisdictions with planning grants and technical assistance.
- The [Washington Association of Building Officials \(WABO\)](#) is a professional association that provides training, certification programs, technical resources, and continuing education opportunities for building officials, plans examiners, inspectors, permit technicians, and other code professionals across Washington State. WABO administers several statewide training and accreditation programs, including the Code Official Accreditation Program (COAP), which provides structured training and certification pathways for building department staff. In addition to technical training, WABO provides code interpretation resources, legislative and code update information, professional networking opportunities, and support for jurisdictions implementing building and energy code requirements.

- The [**Municipal Research and Services Center \(MRSC\)**](#) is a nonprofit organization that provides technical assistance, training resources, model policies, legal guidance, and research support to local governments in Washington State. MRSC offers online guidance, sample ordinances, webinars, training, and direct support for local government staff and elected officials on topics including land use planning, permitting, infrastructure, public administration, and state law implementation.

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5. Data Tracking & Accountability

5.1 Standardize Development Review Data Collection and Performance Tracking

Category: State action; local best practice

Actor: Local jurisdictions; HAPO: DLCD and BCD

Phase of development: All development review phases

Applicability: All jurisdictions and housing types.

Description

Tracking residential development permit timelines across land use, public improvements, and building permitting can help jurisdictions better understand and improve their development review processes. The state can support these efforts by developing standardized definitions, milestones, and performance metrics that align with information jurisdictions already collect. The state could also provide optional reporting templates, technical assistance, and training on available permitting system tools and reports to help jurisdictions implement consistent tracking while minimizing administrative burden. For example, BCD could offer training or readily available guidance on Accela e-permitting software functionality, capability, and report options to help jurisdictions understand the data available to them.

Why this helps

Consistent tracking of residential development permit timelines helps local jurisdictions, and state agencies, better evaluate how the review process is functioning. These data help identify where delays in the review process occur, evaluate whether process improvement efforts are working, and benchmark performance over time. Standardized metrics also improve consistency across jurisdictions, allowing statewide trends to be evaluated without requiring extensive manual reconciliation.

- **Permitting analysis findings:** Data collected for this study varied substantially across jurisdictions because permit types, milestone definitions, and reporting practices were inconsistent. Jurisdictions lack consistent variables for identifying residential permit subtypes and use inconsistent date fields (e.g., application, issuance, finalization) across their local permitting software, preventing comparable timeline measurement. Further, the state's e-permitting system differs from local jurisdiction's, and only tracks building permit subtypes, which makes tracking non-building permit timelines impossible, and reconciling milestones for different kinds of residential development projects across the local and state records management systems difficult. Developing common metrics, improving access to existing reporting tools, and providing training would help jurisdictions better utilize their own data while supporting future statewide analyses.

Implementation considerations:

- Implementing standardized tracking may require staff time and training, which could create challenges for jurisdictions with limited capacity. Technical assistance, templates, and funding could help support implementation.

- To minimize administrative burden, standardized metrics should build on information jurisdictions already collect and report to the state where possible, such as annual housing production data submitted to DLCD (e.g., housing units permitted and produced).
- Jurisdictions use a variety of permitting software and workflows. Standardizing milestone definitions and exported data fields, rather than requiring a single permitting platform, would allow jurisdictions to implement consistent tracking while maintaining local flexibility.

Examples of successful implementation elsewhere/success stories:

- Washington State's Housing Production Dashboard aggregates permit data from local governments using standardized reporting requirements tied to state planning compliance.
- Several Oregon cities already use Accela; updating the database model and local agreements with BCD could improve application and utility.
- **California [Housing Element Annual Progress Report \(APR\)](#):** California requires jurisdictions to prepare and submit Annual Progress Reports using standardized forms, definitions, and guidance developed by the Department of Housing and Community Development. This common reporting framework supports consistent reporting and statewide comparisons

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Targeted Improvements to Specific Review Phases

6. Land Use Reviews

6.1. Simplify Clear & Objective Zoning Regulations

Category: Local action, potential legislation

Actor: Local jurisdiction: planning department

Phase of development: Land use planning

Applicability: Jurisdictions that have implemented detailed clear and objective design or development standards for some or all housing types.

Description

Evaluate and simplify clear and objective zoning and development standards. In many communities, clear and objective standards have become increasingly detailed and prescriptive, particularly in areas with adopted concept plans or master-planned development regulations. While intended to streamline approvals and provide certainty, overly specific requirements related to housing types, site design, building form, and development configuration can limit adaptability and reduce the value of the clear and objective pathway. Jurisdictions can also design clear and objective standards to include optional discretionary alternatives for limited circumstances where strict compliance is impracticable. This approach allows flexibility for minor deviations without triggering a discretionary review process.

Why this helps

Reducing the level of detail required in submittals means less work for developers and their teams to prepare applications and address design details early in the review process. Allowing a wider range of development options to use a clear and objective pathway helps streamline the process compared to when development requires a discretionary review.

Implementation considerations

- In newly urbanizing or UGB expansion areas, creating clear and objective standards that address all the needs of a new neighborhood or subarea (e.g., street layout and parks) can be challenging.

Examples of successful implementation elsewhere/success stories

- A 2025 [Sightline Institute analysis](#) found that Oregon jurisdictions with less prescriptive middle housing regulations, such as allowing duplexes, triplexes, and fourplexes to be either attached or detached and avoiding restrictive minimum unit size requirements, experienced relatively faster middle housing production..
- **Minneapolis, MN:** Widespread zoning reform that made zoning codes simpler and more flexible has been credited with helping increase the housing supply at a much faster rate than other midwestern cities (according to a 2024 [report](#) from the Pew Research Center).

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6.2 Modernization of Final Plat Procedures

Category: Local best practice

Actor: Cities and counties

Phase of development: Land Use, and Public Infrastructure Review for Final Plats

Applicability: All jurisdictions. Primarily relevant for subdivisions and middle housing land divisions.

Description

Cities, counties, county surveyors, and county recording offices may benefit from evaluating opportunities to modernize final plat review, routing, and approval procedures where consistent with local practices and statutory requirements. Potential improvements may include electronic signatures, digital plat review and submittal, online routing and approval workflows, standardized signature block formats, digital correction workflows, and clearer submittal standards. Collaborative discussion could also explore approaches to electronic signatures, digital mylar review, document retention, and recording requirements where appropriate.

Why this helps

Modernized procedures and digital workflows have the potential to reduce document handling delays, improve coordination between reviewing agencies, increase transparency into review status and outstanding corrections, and provide more predictable timelines for applicants and staff. Where appropriate, these approaches may be particularly beneficial for middle housing land divisions and smaller subdivisions, where administrative delays can represent a large share of the overall project timeline.

Focus group findings: Several focus group participants spoke to this subject. Participants noted that final plat approval can be delayed by administrative processes unrelated to substantive review. In some jurisdictions, final plat processing still relies on physical mylar circulation, wet signatures, manual routing between agencies, and mailing corrected documents or comments between reviewers and applicants. Participants noted that even minor revisions can trigger additional recirculation and processing time late in the development process.

- *"The physical signing of plats, printing on mylar, and coordinating plat notes, font changes, and signatures across multiple agencies can take weeks before a plat is finally recorded."* (Developer)
- *"Requiring wet signatures on mylars seems unnecessary—digital signatures would be easier."* (Engineer, Special District Agency, Portland Metro)
- *"Jurisdictions should utilize tools like DocuSign because electronic signatures are safe and official. Requiring notarized signatures, physical plat documents, and manual routing adds unnecessary time late in the process."* (Developer, Portland Metro, Central Oregon, and the Oregon Coast)

Implementation considerations

- Best paired with [Opportunities to Standardize Final Plat Requirements](#) and [Opportunities to Coordinate Final Plat Review Sequencing](#).
- Assess local readiness for digital workflows. Transitioning to digital review may require investments in equipment, software, training, and document management systems.

- Coordinate implementation approaches. Cities, counties, county surveyors, and recording offices may benefit from collaboratively evaluating digital review practices, electronic signatures, and document management approaches to identify opportunities that are compatible with existing legal and operational requirements.

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6.3 Opportunities to Standardize Final Plat Requirements

Category: Local best practice

Actor: Cities and counties

Phase of development: Land use, and public infrastructure review for final plats

Applicability: All jurisdictions. Primarily relevant for subdivisions and middle housing land divisions.

Description

Cities, counties, county surveyors, utility providers, and recording offices may benefit from exploring opportunities to improve consistency in final plat submittal and approval practices. Opportunities for coordination could include more consistent formatting and submittal requirements, standardized signature blocks and plat notes, shared review procedures and checklists, alignment of recording expectations, and clearer approaches to technical corrections, resubmittals, and approval sequencing.

Applicants working across multiple jurisdictions may encounter differing expectations related to plat formatting, review sequencing, correction procedures, signature requirements, and recording coordination. Additional collaboration efforts could help identify opportunities to reduce unnecessary administrative variation while maintaining local review authority and flexibility to address context-specific needs.

Why this helps

Greater consistency in procedures and requirements has the potential to improve predictability for applicants and reviewers, reduce avoidable correction cycles and administrative coordination delays, and support clearer expectations throughout final plat review. Where appropriate, increased consistency may also complement modernization efforts and facilitate coordinated review among participating agencies.

Focus group findings: Several focus group participants reflected on this topic.

- Developers, surveyors, and engineers working across multiple jurisdictions noted that relatively minor differences in local requirements can result in repeated revisions, recirculation of plats, and extended coordination between agencies late in the development process.
 - Participants consistently identified final plat review and recording as one of the most significant administrative bottlenecks in the development process. Some described challenges caused by inconsistent formatting standards, differing plat note requirements, varying correction procedures, inconsistent sequencing expectations, and differing review practices between jurisdictions, county surveyors, utility providers, and recording offices.
 - Participants also noted that inconsistent standards and unclear expectations can create uncertainty regarding completeness, correction timelines, and approval sequencing.
 - Participants reflected on how these issues can delay plat recording, lot creation, financing, utility coordination, and building permit issuance even after substantive land use and engineering review has largely been completed. These delays may have a disproportionate impact on smaller subdivisions and middle housing land divisions, where administrative delays can represent a significant share of the overall project timeline and carrying costs.

Implementation considerations

- Best paired with [Opportunities to Modernize Final Plat Procedures](#) and [Opportunities to Coordinate Final Plat Review Sequencing](#).

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6.4 Remove Local Procedural Requirements to have Final Plat Approval via City Council

Category: Local action

Actor: Local jurisdictions: planning departments, governing bodies

Phase of development: Land use review - Final plat

Applicability: Jurisdictions that currently require governing body review or approval of final plats.

Description

Remove local procedural requirements that require final subdivision plats to receive approval from city councils or other governing bodies when the final plat substantially conforms to an already approved preliminary plat and applicable technical requirements.

Why this helps

Allowing administrative approval of final plats can reduce procedural steps and delays associated with governing body meeting schedules. Expediting the final plat stage can help applicants move more quickly to subsequent development activities, including lot recording, lot sales, financing, and issuance of building permits, potentially reducing overall project timelines and carrying costs. This practice is uncommon, but generally unnecessary.

Implementation considerations

- Jurisdictions may choose to retain governing body review authority for unusually complex subdivisions, major public infrastructure issues, or circumstances involving substantial deviations from preliminary plat approvals.

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6.5 Utilize Model Code Resources from the State Where Possible

Category: Local action

Actor: Local jurisdictions: planning departments

Phase of development: Land use

Applicability: Any jurisdiction, but especially relevant where there are multiple jurisdictions in a given region and for smaller jurisdictions that may struggle to keep codes up to date.

Description

Increase consistency between jurisdictions in the standards and review processes a housing developer would encounter for the same type of development through broader adoption of state-provided model codes. Full use of model codes would best achieve this, but even partial incorporation of model code terms and standards in local code supports the goal.

Why this helps

For developers working across multiple jurisdictions, having consistency in the regulations that apply to a given housing type, scale, or form increases the efficiency of housing production at the regional and state level. For smaller jurisdictions, having a code that developers may already be familiar with can help facilitate development by reducing the developer's effort to review and understand local requirements. Adopting model codes can also reduce local capacity burden when implementing new state laws by reducing the cost and time necessary to make conforming code edits at the local level.

Implementation considerations

- Local governments typically want more local control than utilizing model codes directly.
- Many jurisdictions have expressed a preference for minimum standards, templates, and resources vs. model codes.
- Model codes intended to serve as guidance and inspiration may be more valuable to jurisdictions than model regulations that may be directly applied in the case of noncompliance.

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6.6 Remove Neighborhood Meeting Requirements

Category: Local action, potential legislation or model code guidance.

Actor: Local jurisdiction: planning departments

Phase of development: Land use

Applicability: Jurisdictions that require neighborhood meetings for residential applications.

Description

Remove or limit neighborhood meeting requirements for residential land use applications. Neighborhood meetings are commonly required prior to submission or review of discretionary land use applications such as site plan review, planned unit developments, conditional use permits, variances, subdivisions, partition plats, and design review applications.

Why this helps

Removing required neighborhood meetings can reduce procedural steps, scheduling delays, uncertainty, and consultant costs. They can also reduce pressure to redesign projects that already comply with adopted standards. In a survey of developers and regulators approximately one-third noted that neighborhood opposition created an extreme barrier to residential development while another third found it to be a moderate barrier.¹⁶ Neighborhood meetings for applications that are not subject to a hearing or appeal create potential for friction where people are frustrated about an application but cannot do anything about it, because they are statutorily prohibited from appeal.

Implementation considerations

- HB 4037 removed required hearings (on the initial decision), but it did not limit neighborhood meeting requirements.
- Some jurisdictions may view neighborhood meetings as an important mechanism for early communication between applicants and surrounding property owners. Eliminating the requirement may generate concerns about reduced public engagement or neighborhood awareness of pending development activity. In focus groups, several jurisdictions noted that the removal of hearings had led to resident concerns being expressed in other venues. Removal of neighborhood meetings could have a similar effect.
- Neighborhood meetings may also provide opportunities for applicants and nearby residents to identify and resolve concerns early in the process. Eliminating required meetings could shift some unresolved issues into formal public hearings or appeals.
- Jurisdictions implementing this recommendation may choose to retain optional neighborhood meetings, formal mailed notice, and posted notice.
- Jurisdictions may also choose to clearly communicate when and how the public can meaningfully participate in planning decisions and where public influence is intended to occur within the planning system, with broader policy questions about housing types and density generally addressed during comprehensive planning and zoning processes.

¹⁶ Institute for Policy Research and Engagement. "Barriers to Housing Production in Oregon: Summary Report." Prepared for Oregon DLCD. October 2022.

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6.7 Streamline Land Use Review for an Allowed Use on a Lawfully Established Lot

Category: Local best practice

Actor: Local jurisdictions: planning and building departments

Phase of development: Planning and building permit review

Applicability: All jurisdictions, especially where a separate land use permit is required for housing. Will be most beneficial for smaller infill housing projects, including middle housing, and smaller developers.

Description

Allow development to proceed as a building permit review whenever possible, particularly where the proposed housing types are allowed outright and subject to only clear and objective standards.

Jurisdictions could eliminate a separate Type I land use review or offer the option of concurrent land use and building permit review.

Why this helps

Allowing compliant infill housing projects to proceed directly to building permit review can shorten development timelines, lower application and consultant costs, and reduce procedural complexity. Concurrent land use and building code review processes reduce delays and consultant costs. In another survey of developers and regulators, almost half of respondents found the prolonged time it takes to process land use entitlements as an extreme barrier to residential development, while over one-third found the length of time to process building permits as an extreme barrier.¹⁷

Implementation considerations

- Some jurisdictions use Type I land use review as the primary mechanism for verifying zoning compliance prior to building permit issuance. Implementing this recommendation may require revisions to interdepartmental coordination processes, permitting workflows, and application materials.
- Building departments and land use are not always part of the same municipality. In areas where the county serves as the building department and individual cities within that county provide land use reviews, concurrent reviews may work but it would be less practical for the building department to perform the land use review on behalf of multiple jurisdictions.

Examples of successful implementation elsewhere/success stories

- **City of Portland:** Reviews outright-permitted housing developments for zoning compliance through the building permit review process rather than through a separate land use application process.

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¹⁷ Institute for Policy Research and Engagement. "Barriers to Housing Production in Oregon: Summary Report." Prepared for Oregon DLCD. October 2022.

6.8 Use a Hearings Examiner for Appeals

Category: Local best practice

Actor: Local jurisdictions: planning departments, Planning Commissions, City Council; potential for DLCD support

Phase of development: Land use review

Applicability: Jurisdictions where appeals are routed to planning commissions or elected officials.

Description

Assign quasi-judicial land use appeals, and certain residential discretionary residential development decisions to hearings officers rather than Planning Commissions or local governing bodies.

Why this helps

Using a hearing examiner for appeals may help to ensure quasi-judicial decisions are reviewed primarily based on applicable approval criteria, evidentiary records, and adopted law rather than broader political or policy considerations that are more appropriately addressed through legislative planning and zoning processes. In another survey of developers and regulators, over half of respondents found the public hearings in the land use process to be an extreme or moderate barrier to housing development.¹⁸

Hearings officers may also provide greater procedural specialization and familiarity with quasi-judicial evidentiary standards, local approval criteria, and Oregon land use law. This practice may be especially useful in jurisdictions experiencing lengthy or highly contentious quasi-judicial review processes for housing development applications.

Implementation considerations

- Jurisdictions implementing this recommendation will need to clearly define which application types or appeals are appropriate for hearings officer review.
- Smaller jurisdictions may need to consider administrative and cost implications associated with contracted hearings officers or relatively low volumes of quasi-judicial applications. Shared regional services or on-call hearings officers may help address these challenges.
- Some jurisdictions may prefer not to pass appeal decisions to hearings officers.
- Cities may charge a legal retainer fee to cover the cost of hearings officers, so it could increase the cost for applicants.
- DLCD could assist by supporting access to on-call hearings officers for smaller jurisdictions available across the state. DLCD would need a stable funding source to ensure sufficient capacity to support this effort.

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¹⁸ Institute for Policy Research and Engagement. "Barriers to Housing Production in Oregon: Summary Report." Prepared for Oregon DLCD. October 2022.

7. Public Improvements Requirements and Reviews

7.1. Reform Exactions for Transportation Improvements

Category: Local action, state action

Actor: Local jurisdiction: public works department

Phase of development: Planning and infrastructure review

Applicability: All jurisdictions.

Description

To reduce delays from negotiation over transportation-related public improvements, make costs and requirements more predictable by expanding alternatives such as fee-in-lieu payments, and improving compensation tools when developers must build or fund improvements that exceed their project's proportional impact.

While not directly a process-review issue, local governments should consider the sustainability of required transportation improvements. For developers, having to dedicate site area for right-of-way constrains the number of housing units that can be produced and drives up development costs. For local governments, right-sizing transportation requirements alleviates long-term costs for maintaining infrastructure. Scaling infrastructure requirements to be adequate but not excessive for the development to be served is equally important as reforming the process for determining development exactions.

Specific issues to address include:

- **Frontage improvements:** Reduce the cost burden associated with frontage improvements, especially on smaller infill projects.
 - For projects not involving land division, consider setting limits on the maximum cost of required frontage improvements as a percentage of building permit valuation for infill projects (e.g., single-family and middle housing). This could also include reviewing local right-of-way width and street design standards for opportunities to reduce the amount of land and pavement required.
 - Offer options that allow a developer to fund frontage improvements instead of constructing them. Examples include a fee-in-lieu for frontage improvements in infill situations or where adjacent properties are not fully improved. Formation of local improvement districts or waivers of remonstrance are other approaches.
- **Off-site capacity improvements and traffic impact analysis:** Reduce reliance on exactions for vehicular capacity improvements. State transportation policy has shifted toward multimodal connectivity and safety, but some local and state requirements still emphasize vehicle capacity. Site-specific safety and operational improvements may still be needed, but SDCs may offer a more predictable way to fund broader off-site capacity improvements. Allowing development to account for reduced vehicular travel based on factors that support use of alternative modes can also help ensure requirements are aligned with actual impacts.

- ORS 197A.420(6)(a) limits traffic impact analysis (TIA) and off-site exactions for middle housing. However, it does not apply to small single-unit subdivisions or small multi-unit development that exceeds middle housing definitions.
- The state could also clarify for local governments when they are required to apply ODOT's mobility standards. Some jurisdictions apply mobility standards when they are not required, which can lead to exactions to address capacity issues.
- **Compensation for oversizing:** When developers must build improvements larger than needed to serve their project, jurisdictions can use SDC credits, reimbursement districts, or both to compensate them for the added cost.
 - **SDC credit timing and flexibility:** SDC credits can help offset oversizing costs, but limits on duration and transferability can reduce their value. State law (ORS 223.304(5)(d)) requires credits to be used within no more than 10 years, and jurisdictions may, but are not required to, allow transferability. Greater flexibility would make this tool more useful. Changes to credit expiration would require legislation.
 - **Reimbursement districts:** Jurisdictions can also help developers establish reimbursement districts to recover oversizing costs from benefiting properties as they redevelop. Jurisdictions may also build improvements directly and recover costs from future development. Reimbursement districts are typically limited to 10 years but can be extended, making them more flexible than SDC credits in some cases.

Why this helps

Transportation improvements often create more process issues than other public improvements because local governments have more discretion in setting standards and determining proportionality. Clearer standards would improve predictability, reduce uncertainty, and lower cost burdens, especially for small and infill projects.

- **Survey findings:** In the survey conducted for this study, 36% of producers noted that determining the required infrastructure improvements posed a significant challenge for them. Appeals can add cost and delay for applicants.
- **Focus group findings:** Several focus group participants raised this topic.
 - *"A minor arterial was reclassified to a major arterial, and as a result we lost 4,000 square feet of developable space on a 12,000 square foot lot. No eminent domain, no payment for this land— but we were still required to put in all of the public infrastructure and maintain it."* (Private-sector Planner, Oregon Coast)
 - *"Infrastructure, infrastructure, infrastructure. It kills so many infill projects. Especially when they are small infill like quadplexes."* (Developer, Portland Metro)
 - *"No idea what dedication requirements will be for a project. The dedication sometimes results in unfeasibility because it results in having to dedicate 15% of the lot. Appealed twice, took it all the way to the City Attorney who agreed— but that was two months later, and a lot of money wasted."* (Developer, Portland Metro)
- **Case study findings:** According to the developer of Gooseberry Trails, the City of Portland's public improvement requirements were a major contributor to the project's delays. In addition to having to add a new street where the developer felt a driveway was more appropriate, the developer faced evolving and late rising requirements involving street width, turning radii, utility spacing, and

fire access standards. This required redesigning plans that had already been approved and reconstructing some of the infrastructure that had already been installed.

Implementation considerations

- Implementation may be challenging because there is no universal method for assessing proportionality, and local PWDS may offer limited flexibility. Local governments may also see legal or operational risk in allowing exceptions.
- Setting financial limits on the cost of frontage improvement requirements helps ensure these will not be overly burdensome for developers, which is the issue developers are typically most concerned about. However, financial limits are most effective when paired with sustainable funding mechanisms, such as SDCs, fee-in-lieu programs, or local improvement districts, that allow jurisdictions to deliver needed infrastructure without relying disproportionately on individual development projects. Financial limits also do not eliminate the legal obligation to ensure required improvements are roughly proportionate to impact, given that impact may not scale with development cost.
- A broader review of street cross-sections and designs may complement implementation to ensure the jurisdiction is prioritizing needed improvements in ways that align with local goals and needs. Right-sizing transportation infrastructure can also reduce long-term public maintenance and replacement liabilities while preserving land for housing.
- If developers are not required to build improvements, it becomes more important that SDCs or in lieu fees are sufficient to cover the cost of the public sector building the improvements, which is often higher than the cost of private sector construction. Identifying sustainable funding sources is therefore an important complement to reducing reliance on project-specific exactions.

Examples of successful implementation elsewhere/success stories

- **Oregon City, OR:** New single-family detached and middle housing is required to provide frontage improvements subject to a limit of 10% of total construction costs.¹⁹
- **Fee-in-lieu options for frontage improvements:** Fee-in-lieu programs allow applicants to pay a fee instead of constructing required frontage improvements when immediate construction would be impractical or would result in isolated improvements. Jurisdictions can use these funds to construct coordinated improvements as adjacent properties develop.
 - **Puyallup, WA:** Allows applicants to request a fee in lieu of constructing frontage improvements when doing so would better support coordinated transportation investments. <https://www.puyallupwa.gov/2022/Fee-in-Lieu-Program>
 - **West Richland, WA:** Allows frontage improvement requirements to be modified or waived when construction would not serve the public interest or when an alternative approach better achieves the City's transportation objectives. <https://ecode360.com/49362892#49362898>
- **Reimbursement districts for oversized improvements.** Reimbursement districts allow developers who construct oversized public improvements that benefit future development to recover a

¹⁹ City of Oregon City. Minimum Public Improvement Design Standards for Development. (2023). <https://www.oregoncity.org/DocumentCenter/View/5355/Chapter-1612---Minimum-Public-Improvements--Design-Standards-for-Development---Mar-31-2023>

portion of those costs from future development within the benefiting area. This helps allocate costs more proportionately while reducing the financial burden on the initial developer.

- **City of Hillsboro, OR:** [Reimbursement District Code](#)

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7.2 Proactive Infrastructure Planning by Jurisdictions and Special Districts

Category: Local action

Actor: Local public works, engineering, and transportation departments; special service district utility providers

Phase of development: Planning and infrastructure review

Applicability: All jurisdictions

Description

Engage in infrastructure planning, such as refinement plans for specific areas, corridor plans, or public facility plan updates to improve service providers' ability to identify needed infrastructure improvements and make viable infrastructure funding plans where needed to support infrastructure upgrades serving a broader area. This can reduce time and uncertainty compared to applicants making individual inquiries. It can also help establish systems to provide funding for necessary upgrades while maintaining proportionality for individual developments (e.g., supplemental SDCs, reimbursement districts, or local improvement districts).

Why this helps

There is a more widespread need to coordinate requirements, beyond individual lot development inquiries, to prepare public and private parties for development requirements. The local government may have a role to play in establishing a zone of benefit/reimbursement district or similar for facilities owned by the city or by a utility provider. This will streamline/expedite review by special service districts and was raised during recent DLCD rulemaking as a significant process delay (site-by-site inquiries being quite inefficient).

Implementation considerations

- This will start happening more with Development-Ready Land Inventory requirements for local governments with expanded Goal 10 obligations.

Examples of successful implementation elsewhere/success stories:

- Concept and community planning efforts for new UGB expansion areas in the Metro region include planning for infrastructure needs and infrastructure funding strategies.

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7.3 Align Street and Access Standards Across Departments and with External Reviewers

Category: Local best practice, state action

Actor: Local government(s): cities and counties, ODOT, fire districts

Phase of development: Land use planning, public infrastructure, and building review.

Applicability: All jurisdictions. Particularly relevant for jurisdictions that have many sites along state highways or County roads, and for those whose fire protection is provided by a separate agency from the land use reviewing jurisdiction.

Description

Coordinate land use, engineering, utility, and fire review requirements related to site design, access, circulation, and infrastructure improvements to reduce conflicting direction during project review. This may include aligning standards for frontage improvements, driveway spacing, fire access, stormwater facilities, utility requirements, and street design, as well as reconciling conflicts between development and fire codes. Coordination may also include improving consistency between internal departments and external reviewing agencies.

Why it helps

Aligning standards and improving interdepartmental coordination can reduce conflicting direction to applicants, streamline review, and improve predictability for both staff and developers. Proactively reconciling conflicts between development code, engineering standards, and fire code can also help jurisdictions provide clearer expectations earlier in the development process and reduce the need for iterative redesigns or negotiated exceptions during permit review.

- **Focus group findings:** Participants noted that applicants are often responsible for identifying, mediating, and resolving conflicting requirements between departments or external reviewers on a project-by-project basis. Participants described this as creating added cost, delay, and uncertainty during project review, particularly when conflicts are identified late in the process.
- **Case study findings:** The development team of Gooseberry Trails indicated that they often act as a mediator between different reviewers in the City of Portland. Examples included differing direction related to frontage improvements, driveway spacing, fire access, stormwater design, or street standards.

Implementation considerations

- **Identify where conflicts occur most often.** Jurisdictions should begin by mapping common points of conflict across planning, engineering, utilities, fire, and external reviewers, such as driveway access, frontage improvements, fire lane width, stormwater placement, and street cross sections.
- **Clarify decision-making authority.** Alignment requires clear rules for which standard controls when requirements conflict, who has authority to approve deviations, and how disputes between reviewers are resolved.
- **Create a cross-department review protocol.** Cities and counties may need standing coordination meetings, shared pre-application review procedures, or joint comment letters so

applicants receive consolidated direction rather than separate and potentially conflicting comments.

- **Engage external reviewers early.** ODOT, county road authorities, fire districts, utility providers, and special districts should be included when local standards are updated, especially where they have independent approval authority.

Examples of successful implementation elsewhere/success stories

- **City of Albany:** The City includes its fire department in pre-application meetings to help ensure access requirements are clear early in the process. In the Colonia del Valle Próspero case study, this involvement led to early identification for a condition of approval that allowed for an access to be constructed later than would otherwise be required to recognize the project's phased elements.

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7.4 Update Public Works Design Standards Related to Middle Housing

Category: Local action

Actor: Local jurisdiction: public works departments

Phase of development: Public improvements review

Applicability: Any jurisdiction subject to state middle housing statutes.

Description

Update local jurisdictions' PWDS related to middle housing to reflect recent changes in housing laws and facilitation of these types. This may include providing updated standard details (e.g., for shared utility laterals where permitted). Clarify criteria for what improvements are required and what utility configurations are permitted for middle housing types to ensure consistency with state legislative intent (i.e. not overburdening these types).

Why this helps

- Middle housing has complicated on-site infrastructure (e.g., shared laterals and driveways), including how on-site private improvements connect to the public improvements. It may not be clear to applicants or reviewers what all the appropriate options are.
- On small sites, small differences (e.g., easement widths) can make a difference in what will fit on the site.

Implementation considerations

- The state may be able to fund or otherwise support creating optional model public works standards for things like street widths, improvements, shared facilities, etc.
- The state could explore financial incentives for jurisdictions to adopt the model public works standards.

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7.5 Cite Relevant Public Works Design Standards

Category: Local action

Actor: Local jurisdiction: public works department

Phase of development: Public Improvements

Applicability: All jurisdictions, and all housing types.

Description

Cite relevant public works designs standards (PWDS) when providing comments to applicants ("cite it, write it") for review clarification and streamlining redline comments/iterations.

Why this helps

Pointing applicants to the applicable standards ensures that comments are clearly linked to the standards and that applicants can find additional information on the standards in question when needed. This was raised as a suggestion by a local government official during focus groups because of a perception that applicants don't know where requirements are coming from.

Implementation considerations

- It may increase effort for the reviewers somewhat to identify specific citations.

Examples of successful implementation elsewhere/success stories

- This requirement already applies to building plan reviews.
- Many jurisdictions already cite applicable development code standards in land use review comments.

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7.6 Allow Flexibility on Timing of Minor Public Works Improvements

Category: Local action

Actor: Local public works, engineering, and transportation departments

Phase of development: Planning and infrastructure review

Applicability: All jurisdictions, most beneficial for phased subdivisions.

Description

Allow applicants greater flexibility in sequencing or implementing minor public infrastructure improvements associated with housing development as long as the improvement is bonded, covered by a subdivision or public improvement agreement, subject to city inspection, and completed before occupancy, final acceptance, or another clear milestone. Examples might include allowing developers to construct curb cuts and frontage improvements early in the development process, or on a lot-by-lot basis, depending on applicant's preference.

Why this helps

Providing flexibility for minor public works sequencing decisions can reduce delays and allow developers to phase improvements in ways that better align with financing, seasonal construction schedules, and market conditions.

Implementation considerations

- Jurisdictions would need to clearly identify which infrastructure standards and decisions are appropriate for applicant flexibility and which require standardized sequencing.
- Jurisdictions implementing this recommendation would still need mechanisms to ensure that all required public improvements are fully completed and inspected.

Examples of successful implementation elsewhere/success stories:

- **Keizer, Oregon** allows sidewalk construction in subdivisions to be deferred until the dwelling or structure fronting the sidewalk is built. (This does not apply to required off-site sidewalks and sidewalks fronting public property.)²⁰

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²⁰ City of Keizer, *Keizer Development Code*, § 2.310.06.I, "Sidewalks," accessed June 1, 2026, <https://evogov.s3.amazonaws.com/media/60/media/75195.pdf>.

7.7 Allow Licensed Engineers to Self-Certify Public Improvement Plans

Category: Local action, legislation

Actor: Local jurisdictions

Phase of development: Public improvements review

Applicability: May be most beneficial for small projects with relatively straightforward infrastructure improvements needed.

Description

Oregon already accepts professional self-certification in a limited residential-building context where the professional is licensed, independently certified as a plans examiner, and the project is standards-based. A similar but separately authorized pathway could be created for eligible public improvement plans prepared by Oregon-licensed civil engineers.

Why this helps

- Forgoing the need for a jurisdictional review could save time and money for the applicant and reduce review burdens on the jurisdiction staff.

Implementation consideration

- Such a program would require establishing scope limits, a process for audits, inspection authority, and other safeguards.

Examples of successful implementation elsewhere/success stories

- **New York City's Department of Transportation (DOT)** allows property owners to install required street infrastructure without prior DOT plan review when the plans are professionally self-certified. Under this process, a licensed Professional Engineer, Registered Architect, or Registered Landscape Architect may certify that the proposed infrastructure work strictly complies with applicable DOT publications and meets or exceeds DOT standards and specifications. The professional must submit paperwork documenting their qualifications and certification to be eligible for the program.²¹

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²¹ New York City Department of Transportation. *Instructions for Filing Plans & Guidelines for the Design of Sidewalks, Curbs, Roadways and Other Infrastructure Components*. Revised January 22, 2024; cover page revised January 30, 2026. Accessed June 1, 2026. <https://www.nyc.gov/html/dot/downloads/pdf/instfilingplan.pdf>

8. Building Reviews

8.1. Update Standards for Manufactured Dwelling Parks

Category: Local action, legislation

Actor: State and local jurisdictions

Phase of Development: Planning and building

Applicability: All jurisdictions.

Description

Modernize state and local regulations governing manufactured dwelling parks to reflect current housing products, development practices, accessibility expectations, infrastructure needs, and land use goals. Updates to the Oregon Manufactured Dwelling and Park Specialty Code (MD&P), which was last updated in 2002, could support more efficient land utilization, address outdated parking and design standards, improve ADA compliance, and better accommodate a broader range of housing types and development configurations within manufactured dwelling parks.

Why this helps

Some standards governing manufactured dwelling parks do not reflect contemporary housing products, development practices, or efficient land use patterns. Local zoning requirements and outdated state standards can limit the siting of new parks, miss opportunities to preserve parks, and make the replacement of existing units challenging. Differences between state regulations and local zoning standards can also create uncertainty regarding park development requirements, infrastructure standards, and allowable housing types. Manufactured dwelling parks provide an opportunity for homeownership that is in many cases affordable.

Modernizing manufactured dwelling park standards could support:

- More efficient land use patterns
- Expanded housing choice through tenure and affordability variety
- Infrastructure modernization
- Improved accessibility outcomes
- Replacement and preservation of existing manufactured housing stock
- Development flexibility for contemporary factory-built housing types

Implementation considerations

Modernization of manufactured dwelling park standards would require coordination among state agencies, local jurisdictions, infrastructure providers, home fabricators, home transporters, non-resident park owners, non-owner residents, resident park owners, and industry professionals.

- **State and local coordination:** Updating state statutes and specialty codes while aligning local zoning and development regulations may require substantial interagency coordination.

- **Local zoning and development standards:** Local jurisdictions may need to review and update zoning, siting, parking, landscaping, density, and infrastructure requirements that apply to manufactured dwelling parks. DLCDD may be able to assist with creating a model code.
- **Infrastructure and accessibility upgrades:** Modernization efforts may require upgrades to utilities, circulation systems, ADA accessibility, stormwater systems, and emergency access standards within existing parks.
- **Consistency between state and local standards:** Differences between state specialty codes and local development regulations can create conflicting requirements or unclear review processes. Clarifying these relationships may improve predictability for applicants and reviewers.
- **Financing, taxation, and resident impacts:** Changes to manufactured dwelling park standards or siting requirements would need to consider financing, taxation, and resident protections systems.

The state already has plans to update installation codes. Changing some standards would require rulemaking efforts. See the parallel HAPO report, the Evaluation of State Policies and Programs on Housing Production Study, for additional details.

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