S.B. 1537 Technical Appendix: Impacts of State Policies and Programs on Housing Production



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AI Use Disclosure

This technical appendix report integrates the University of Oregon’s Microsoft Copilot artificial intelligence (AI) ecosystem to support the analysis and presentation of findings, particularly in relation to engagement data and policy interpretation. Additionally, Claude.AI was used to summarize and synthesize publicly available reports to cross-reference report recommendations with prior reports. All AI-assisted outputs were reviewed and refined by the report authors to ensure accuracy, contextual relevance, and alignment with the policy framework under review. Final interpretations and recommendations reflect human judgment and expertise.

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Introduction

This report summarizes the results of research conducted by the University of Oregon's Institute for Policy Research and Engagement (IPRE) in coordination with the Housing Accountability and Production Office (HAPO) to address the requirements of Oregon Senate Bill 1537. Section 5(3) requires HAPO "produce a report summarizing state agency plans, policies, and programs related to reducing or eliminating barriers to the production of housing." The primary purpose of this project is to: (1) identify opportunities to reduce state-level barriers to more housing and (2) set priorities for agency resources and programs that increase housing production.

Technical Appendices to the Summary Report

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Part A: Summary of Background Research Documents

This technical appendix provides summaries of key policy and research documents that inform the development of the Impacts of State Policy and Programs on Housing Production summary report. These documents are cited directly within the summary report where relevant.

IPRE identified and sourced reports from the following:

- Previous IPRE housing research projects conducted in 2018 and 2022;
- Recent state-level convenings and reports related to barriers to housing production;
- Documents and reports related to housing production or prior program assessments identified and provided by HAPO staff and members of the State Agency Work Group;
- Key word search of state agency websites for reports and assessments related to housing production, program evaluation, or streamlining; and a
- Search of relevant journals or publications.

National Level

The Cost of Fragmentation: A Comparison of State Affordable Housing Finance Governance Systems – Terner Center for Housing Innovation (2026)

The Cost of Fragmentation report examines how states structure the governance of their affordable housing finance systems and identifies best practices for reducing administrative fragmentation. Drawing on a landscape scan of all fifty states and detailed case studies of six states—Maryland, Massachusetts, Minnesota, New York, North Carolina, and Oregon—it finds that states rely on an average of 2.5 separate entities to administer the five major affordable housing finance programs, a division that can generate conflicting deadlines, duplicative reviews, and higher carrying costs that ultimately raise development costs and slow production. The report highlights that several states have begun consolidating housing functions, creating cabinet-level housing offices, and adopting "one-stop shop" single-application processes to streamline funding awards. Overall, it emphasizes that strong governance through consolidating functions, investing in staff capacity and systems, and creating unified processes translates over time into lower costs, faster execution, and greater stakeholder confidence in the delivery of affordable housing.

Increasing the Housing Supply by Reducing Costs and Barriers – National Conference of State Legislatures (2024)

The Increasing the Housing Supply by Reducing Costs and Barriers snapshot provides a concise overview of the factors driving the nationwide shortage of rental and owner-occupied housing and the legislative tools states are using to close the gap. It finds that a complex mix of high interest rates, inflation, rising materials costs, lengthy permitting processes, and restrictive zoning is constraining supply and pushing up prices for renters and buyers alike. The report identifies several specific barriers, including zoning that prohibits housing types other than single-family homes, permitting delays that add months to construction timelines, outdated or unnecessary building codes, and minimum parking requirements that can add tens of thousands of dollars per unit. Overall, it emphasizes that state legislatures are responding by revising zoning regulations, streamlining administrative processes, and incentivizing construction through tools such as tax abatements and low-income housing tax credits to expand supply and improve affordability.

Housing Underproduction in the US Report – Up for Growth (2023)

The Housing Underproduction in the U.S. (2023) report examines the scale, causes, and consequences of the nation's persistent housing shortage, emphasizing that underproduction has reached nearly 3.9 million missing homes and is worsening across most regions. It finds that housing demand has outpaced supply due to long-standing structural factors, including exclusionary zoning, regulatory barriers, insufficient investment, and shifting demographic trends accelerated by the COVID-19 pandemic. The report highlights that underproduction is no longer confined to major cities but has spread to suburbs, small towns, and rural areas, contributing to rising housing costs, increased cost burdens for renters, widening racial inequities, and negative impacts on economic growth and workforce stability. Overall, it argues that addressing the crisis will require comprehensive policy reforms, including reducing regulatory barriers, increasing housing diversity and density, investing in infrastructure and construction innovation, and strengthening collaboration across public and private sectors to expand housing supply and improve affordability.

From the Housing to the Ground – Lincoln Institute of Land Policy (2023)

The From the House to the Ground report (2023), by the Lincoln Institute of Land Policy and Brookings Metro, examines the challenges states face in implementing housing reforms after legislation is passed. It finds that while many states have adopted policies to increase housing production, affordability, and diversity of housing types, successful outcomes depend heavily on complex implementation processes involving state agencies and local governments. The report highlights that implementation requires iterative rulemaking, strong public and political support, sufficient administrative capacity, and clear data systems for monitoring progress, all of which vary widely across states and communities. It also emphasizes that policy design choices affect how effectively reforms are carried out, and that meaningful impacts on housing supply may take several years to materialize. Overall, the report underscores that passing housing legislation is only the first step, and that sustained coordination, resources, and realistic timelines are essential to achieving improved housing affordability and production.

Incentivizing Housing Production: State Laws from Across the Country to Encourage or Require Municipal Action – Terner Center for Housing Innovation (2023)

The Incentivizing Housing Production: State Laws from Across the Country report (2023) examines how state governments use legislative tools to encourage or require local governments to increase housing supply, particularly in response to nationwide underproduction and affordability challenges. Drawing on a database of 144 state laws, the report finds that states intervene in local land use through a combination of policy approaches, including planning requirements, state standards that override local zoning, financial incentives ("carrots"), and penalties for noncompliance ("sticks). These policies target a range of goals, such as expanding overall housing supply, promoting affordable housing, advancing fair housing, and supporting sustainable, transit-oriented development. Overall, the report emphasizes that while state-level action can play a critical role in overcoming local barriers to housing production, the effectiveness of these policies depends on design, implementation, and ongoing coordination between state and local governments.

Regulatory Barriers and Affordable Housing: Problems and Solutions (Evidence Matters) – U.S. Department of Housing and Urban Development (2018)

The Spring 2018 edition of HUD's Evidence Matters focuses on the role of local zoning and land use regulation in constraining the supply of affordable housing and the strategies state and local governments are using to address it. Through a lead feature, a research spotlight, and an in-practice article, the issue finds that density limits, height restrictions, parking requirements, lengthy permitting and approval processes, and "not in my backyard" (NIMBY) opposition are primary drivers of restricted housing supply and rising prices. It reviews the history and purpose of zoning, surveys the current state of research on the costs that regulations impose on housing production, and examines legislative efforts in Massachusetts and California to streamline permitting and ease restrictive zoning. The publication emphasizes that while local communities have struggled to overcome regulatory barriers, state governments can encourage and empower local reform through a range of promising approaches that reduce barriers and expand affordable housing.

Development Process Efficiency: Cutting Through the Red Tape – National Association of Home Builders / Abt Associates (2015)

The Development Process Efficiency: Cutting Through the Red Tape report examines the land development review and approval process as an often overlooked but significant driver of housing costs and identifies practical strategies for making it faster, more predictable, and less costly. It finds that lengthy and unpredictable approvals tie up builders' capital, accumulate carrying costs, and disproportionately burden affordable housing, while the need to navigate different requirements across multiple jurisdictions compounds the problem. Drawing on case studies from communities such as Leesburg, Dallas, New York City, Montgomery County, and Columbus, the report catalogs strategies including consolidating and streamlining review, one-stop permitting, increased interagency coordination, expedited review tracks, online permitting, staff-capacity investments, accountability measures, and state-level assistance to local governments. It emphasizes that improving the efficiency and predictability of the development process is among the most effective ways to reduce housing costs and support production at all price levels.

Smart Growth Policies: An Evaluation of Programs and Outcomes - Lincoln Institute of Land Policy (2009)

The book Smart Growth Policies: An Evaluation of Programs and Outcomes (Lincoln Institute of Land Policy, 2009) provides a comprehensive, comparative assessment of state-level smart growth initiatives across the United States. Developed by a team of researchers, it evaluates how these policies have influenced development patterns, transportation, and environmental outcomes by comparing states with and without formal smart growth programs using a standardized set of indicators. The study finds that while smart growth policies can be effective in achieving specific objectives such as promoting compact development or protecting open space, outcomes vary widely across states, and no single state performs strongly across all goals. Overall, the work emphasizes that the effectiveness of smart growth depends on policy design, implementation, and local context, highlighting the need for coordinated, long-term approaches to managing growth and land use.

Evaluating Smart Growth: State and Local Policy Outcomes – Lincoln Institute of Land Policy (2009)

The Evaluating Smart Growth: State and Local Policy Outcomes report presents an objectives-based evaluation of state smart growth policies, comparing states with well-established statewide programs against states using other land management approaches. It finds that no state performed well across every goal, but that states generally succeeded in the areas they prioritized—for example, Oregon's urban growth boundaries reduced development on farmland and slowed congestion growth, even as its affordable housing objectives lagged. The report concludes that achieving smart growth is possible but requires sustained focus on clear goals, regional coordination of state and local policies, and specific implementation mechanisms rather than broad declarations of intent. Overall, it emphasizes that no single approach fits every state, and it serves as a concise companion to the Lincoln Institute's more detailed evaluation of smart growth programs summarized above.

A Primer on State Development Plans – Gerrit Knaap & Rebecca Lewis (2009)

This working paper reviews the practice of state development planning across five states to assess its promise as a tool for coordinating land use and pursuing greenhouse gas reduction targets. It notes that such comprehensive state plans are relatively rare and most common in small Eastern states, even as state climate action planning has become more widespread. The paper finds that state development plans vary widely in how well they align across state agencies and between state and local plans, and that while they hold real promise for addressing climate change, they generally need stronger design and more durable connections between plans. Overall, it emphasizes that the effectiveness of these plans depends on the strength of their coordination and on their stability across changes in gubernatorial administrations.

Regulatory Implementation: Examining Barriers from Regulatory Processes (Cityscape) – U.S. Department of Housing and Urban Development (2005)

The Regulatory Implementation: Examining Barriers from Regulatory Processes article examines how the administration of regulatory processes, as distinct from the substance of the regulations themselves, affects the availability and affordability of housing. It identifies two principal barriers: delays in construction and rehabilitation caused by cumbersome decision-making, which add to costs, and the burdens of regulatory implementation that discourage development altogether and reduce overall supply. Drawing on broader scholarship on regulatory reform, the article points to promising directions such as simplifying administrative processes, reducing conflict through consensus building, and adopting more facilitative review and enforcement practices. The article emphasizes that the effects of regulatory processes remain understudied, and that the principal challenge for federal policy is its limited role in shaping the state and local processes where most barriers arise.

Plans Can Matter! The Role of Land Use Plans and State Planning Mandates in Limiting the Development of Hazardous Areas – Raymond J. Burby & Linda C. Dalton (1994)

This article investigates whether formally adopted land use plans and state planning mandates can limit development in areas exposed to natural hazards, drawing on data from 176 local governments across five states. It finds that land use plans can be an effective tool for steering development away from at-risk areas, but that in the absence of state mandates requiring both the preparation of plans and explicit attention to hazards, many local governments simply forgo the opportunity to reduce risk. The authors show that state requirements for local planning produce tangible community benefits that would not otherwise be realized. The article emphasizes the pivotal role of state planning mandates in shaping local behavior—an early and influential finding on how higher-level requirements can drive coordinated local planning and deliver public benefits that voluntary local action alone does not.

Oregon – Housing Focused

Rural Housing Policy Incubator: January 2026 Summary Report – Inspire Oregon (2026)

The Rural Housing Policy Incubator Summary Report documents the outcomes of an October 2025 convening in which more than ninety practitioners, policymakers, and experts developed recommendations for accelerating housing production in Oregon communities of fewer than 10,000 people. Produced through a collaboration between the University of Oregon and Lane County, it organizes its work around four challenges facing small cities: land readiness, infrastructure capacity, access to development capital, and a slow, uncertain land development process. For each, participants refined concrete proposals for the 2026 legislative session and beyond, such as regulatory exemptions for small cities and a clearer "use by right" approval pathway. Overall, the summary report emphasizes that coordinated state action across these areas is needed to reduce barriers and expand housing in rural Oregon.

Housing Production Advisory Council (HPAC) Recommendations Report (2024)

The Housing Production Advisory Council (HPAC) Final Report is a comprehensive, state-directed effort to address Oregon's projected 140,000-unit housing deficit by identifying barriers and recommending reforms across the housing production process. Organized around five key areas—land availability, permitting, codes and design, financing, and workforce capacity—the report evaluates systemic constraints and proposes strategies to accelerate housing development while prioritizing affordability and equity. It finds that major obstacles include limited buildable land, complex and lengthy permitting processes, regulatory requirements that increase costs, insufficient infrastructure funding, and shortages in the construction workforce. Overall, the report emphasizes coordinated state action, increased financial investment, regulatory streamlining, and expanded workforce development as essential to meeting housing production goals and improving housing access statewide.

Potential Evaluation Considerations and Metrics for Local Infrastructure Projects to Support Housing (SB1537)- ECONW (2024)

The Infrastructure Evaluation Considerations report was developed in response to a legislative directive in SB 1537 (2024) Section 16 to create a more consistent and transparent framework for evaluating and prioritizing state funding requests for local infrastructure projects that support housing within urban growth boundaries. The report identifies key challenges in the existing process, including limited standardization and uncertainty about project readiness. It proposes a two-stage evaluation framework centered on infrastructure readiness and housing relevance, with additional considerations such as equity, cost effectiveness, and co-benefits to guide legislative decisions. It finds that infrastructure limitations, particularly related to funding, permitting, and system capacity, are significant barriers to housing development and that better alignment between infrastructure investment and housing needs is essential to accelerating production. Overall, the report emphasizes that a standardized, data informed evaluation approach can improve accountability, prioritize high impact projects, and support more effective coordination between state and local efforts to address Oregon's housing shortage.

Barriers to Housing Production in Oregon Report - IPRE (2022)

The Barriers to Housing Production in Oregon report provides a comprehensive analysis of the factors limiting housing development across the state based on stakeholder surveys, literature review, and policy analysis. It finds that housing production is constrained by a complex set of interacting barriers, with the most significant challenges stemming from high construction and labor costs, shortages in skilled workers, limited availability of development-ready land, and infrastructure constraints. The report also highlights that while regulatory and permitting barriers exist, their impact varies by community, and developers often perceive these process-related obstacles as more severe than public agencies do. Additionally, it identifies a persistent gap in the production of affordable housing, particularly for low- and moderate-income households, driven by both market dynamics and structural barriers. The report emphasizes that addressing Oregon's housing shortage will require coordinated, multi-level policy responses that improve land readiness, streamline development processes, expand infrastructure investment, and better align incentives to support increased housing production across income levels.

What's Up Downtown? A Playbook for Activating Oregon's Upper Stories – IPRE (2022)

The "What's Up Downtown?" report examines the potential of underused upper-story spaces in Oregon's downtown buildings as a strategy to address housing shortages and revitalize communities. Drawing on surveys, interviews, and case studies, the report finds that many upper floors remain vacant or underutilized despite strong community interest in residential and mixed-use redevelopment. It identifies key barriers, including high renovation costs, complex and inflexible regulations, and limited technical and organizational capacity among communities and property owners. Overall, the report emphasizes that coordinated action, flexible policies, increased financial support, and stronger collaboration among interested parties are essential to unlocking upper-story redevelopment as a tool for expanding housing and strengthening downtown vitality.

ODOT Transit and Housing Study (Housing Market Primer) – ECONW (2020)

The ODOT Transit and Housing Study is a legislative report that examines the relationship between transportation systems and housing development in Oregon, with the goal of identifying strategies to increase affordable, transit-supportive housing. It reviews existing policies, market conditions, research, and case studies to better understand how transit access can influence housing availability and affordability. The study finds that fragmented policies, limited transit service, and weak coordination among agencies and interested parties hinder progress. It ultimately recommends aligning state policies and investments, improving transit access, and focusing housing development near transit as key strategies to expand affordable housing while promoting equitable outcomes.

Oregon's Housing Affordability Crisis: Results of a Statewide Survey of Oregon Cities report - IPRE (2018)

The Oregon's Housing Affordability Crisis: Results of a Statewide Survey of Oregon Cities report examines housing needs, barriers, and policy responses across Oregon through a survey of city officials. It finds that housing affordability is widely viewed as a critical issue, with significant unmet demand for affordable and workforce housing, particularly for low- and moderate-income households. The report identifies major barriers including a lack of development-ready land, high land costs, infrastructure funding challenges, and limited local capacity, while also noting that many cities have not adopted recent policy changes and often lack familiarity with available housing tools. Overall, the report highlights gaps between the scale of the housing problem and the effectiveness of current local responses, emphasizing the need for stronger policy implementation, better coordination, and increased resources to improve housing affordability across the state.

The Challenge of Housing Affordability in Oregon – Diller & Sullivan (2018)

This article examines the causes of Oregon's housing affordability crisis and the legal and policy tools available to address it, situating the state's land use planning system within the broader national context. It traces the federal government's role in housing and argues that chronic federal underfunding of low-income housing has left states like Oregon vulnerable to affordability pressures. The article then details Oregon's land use system created by Senate Bill 100 (1973) and Statewide Planning Goal 10, which were designed to curb exclusionary zoning and require local governments to plan and zone sufficient land for housing across all income levels. Drawing on data since 1974, it finds that despite these tools, homes have grown larger and more costly while both rental and owner-occupied housing have become significantly less affordable. Overall, the authors conclude that while Oregon's framework prevents many forms of exclusionary zoning and creates conditions favorable to housing production, regulation alone does not build housing, and weak enforcement, insufficient state funding, and heavy reliance on the private sector mean that emerging tools like inclusionary zoning and "missing middle" reforms are unlikely to fully resolve the crisis.

Oregon – Program Focused

2024 Urban Growth Report – Portland Metro (2024)

The 2024 Urban Growth Report provides a regional assessment of population, housing, and employment trends in the Portland metropolitan area to inform decisions about urban growth boundary (UGB) management. The report evaluates whether existing land supplies within the UGB can accommodate projected growth, emphasizing that land readiness, infrastructure, and development capacity are as important as overall land supply. It finds that the region faces ongoing pressures related to housing affordability, changing demographics, and economic development needs, while also highlighting gaps between housing capacity and projected demand under current scenarios. In this context, the report supports a data-driven approach to growth management, noting that UGB expansions should be considered only when necessary and alongside coordinated investments in housing, infrastructure, and regional planning to ensure equitable and efficient urban development.

Exurban growth inside the urban growth boundary? An examination of development in Oregon cities – Rebecca Lewis & Rober Parker (2021)

The Exurban Growth Inside the Urban Growth Boundary report examines development patterns on land inside Oregon's urban growth boundaries but outside city limits to assess how these areas contribute to housing supply and land use efficiency. Using survey data and spatial analysis, the report finds that these "urbanizable" areas are often developing at low, exurban-style densities despite being intended for future urban development. This pattern can reduce long-term development capacity, complicate infrastructure planning, and contribute to inefficiencies that increase pressure for future UGB expansions. Overall, the report highlights a mismatch between planning goals and actual development outcomes and emphasizes the need for stronger coordination, infrastructure investment, and policy alignment to ensure that land within UGBs is used more efficiently to support housing production.

NPDES Water Quality Permitting Program Evaluation – Oregon Department of Environmental Quality (2016)

Building on earlier program improvement efforts, the NPDES Water Quality Permitting Program Evaluation report assesses Oregon DEQ's permitting system in response to significant backlogs in renewing water quality permits and identifies systemic barriers to timely and consistent permit issuance. Based on a comprehensive external review, the report finds that fragmented leadership, limited community capacity, misalignment with federal requirements, inefficient processes, staffing shortages, unstable funding, and limited performance tracking all contribute to delays. It recommends a coordinated, systemwide set of reforms, including centralized decision-making, improved data systems and permit tools, targeted staffing and funding strategies, and stronger communication and accountability measures. The evaluation emphasizes that sustained improvements will require integrated changes across organizational structure, resources, and processes to restore an effective and timely permitting program.

Analysis of Development on Rural Residential Lands: A report to the HB 2254 Rules Advisory Committee – IPRE (2015)

The Analysis of Development on Rural Residential Lands report (2015), prepared for the Department of Land Conservation and Development to inform rulemaking under House Bill 2254, examines how rural residential lands have developed when brought into or annexed within urban growth boundaries (UGB) in Oregon. The report combines survey data and spatial analysis to evaluate patterns of parcelization, development timing, and housing density, and finds that UGB expansions have generally been small and infrequent, with land often taking significant time to develop after inclusion. It identifies that rural residential lands tend to develop at relatively low or variable densities and that parcel size and prior development strongly influence future urban development capacity. Overall, the report highlights that land supply alone does not guarantee housing production, emphasizing the importance of development readiness, zoning transitions, and market dynamics in shaping effective urban growth and housing outcomes.

Land Use Planning in Oregon: The Quilt and the Struggle for Scale (in Planning for States and Nation-States in the U.S. and Europe) – Ethan Seltzer (2015)

Chapter 2 of the book: Planning for State and Nation-States in the US and Europe, traces the history and structure of Oregon's statewide land use planning program and uses it to explore a central challenge in American planning: matching the scale of planning to the scale of the problems it must address. It describes how Senate Bill 100 (1973) set statewide planning goals and created a state agency to oversee them while leaving actual planning to cities and counties, producing what the chapter describes as a "quilt" of local plans stitched together by a common state framework rather than a single state plan. Reviewing decades of evidence, it finds that this approach has effectively contained sprawl and preserved farm and forest land, and that research has not clearly linked urban growth boundaries to higher housing prices, pointing instead to income and economic growth. The chapter emphasizes that Oregon's lasting contribution is its demonstration that accountable relationships across local, regional, and state scales can coexist and even work together.

Wastewater Permitting Program Improvements and Measures – Oregon Department of Environmental Quality (2013)

The 2013 Wastewater Permitting Program Improvements report provides an update to the Oregon Legislature and Environmental Quality Commission on the status and performance of the state’s wastewater permitting system under Senate Bill 45 (2005). It describes efforts to improve permit quality, reduce backlogs, and adopt a watershed-based approach that better integrates permitting, monitoring, and enforcement activities. The report finds that while new tools such as standardized templates, staff training, and electronic tracking systems have improved efficiency and consistency, challenges including staffing shortages, budget constraints, and litigation have limited progress. Overall, it emphasizes ongoing efforts to strengthen program effectiveness through continued process improvements, stable funding, and coordinated management to meet long term water quality goals.

Oregon Planners' Journal: SB 100 40th Anniversary Special Issue – Oregon Chapter, American Planning Association (2013)

This special issue of the Oregon Planners' Journal marks the fortieth anniversary of Senate Bill 100, the 1973 law that established Oregon's statewide planning program, and reflects on its history, achievements, and continuing tensions. Its lead article offers a concise history of Oregon land use planning—from early local zoning through SB 100, the creation of statewide goals, and the use of urban growth boundaries. A companion article traces how the property-rights ballot measures of the 2000s (Measures 7, 37, and 49) tested and reshaped the program by raising the question of whether government must compensate landowners when regulation reduces property value. The issue emphasizes that Oregon's planning system, though widely regarded as a national model, remains politically contested and depends on ongoing advocacy and adaptation to endure.

Governor's Regulatory Streamlining and Simplification Project: Creating a Roadmap to Improve Regulatory Effectiveness – Oregon Department of Justice / Office of the Governor (2012)

The Governor's Regulatory Streamlining and Simplification Project Final Proposal, submitted to Governor John Kitzhaber, presents a long-term roadmap for improving the timeliness, certainty, and outcomes of Oregon's state-level regulatory and permitting processes without weakening the substantive protections embedded in state law. Launched in 2011 to advance the 2010 Oregon Business Plan's regulatory goals and informed by state agency and stakeholder surveys plus eight regional outreach meetings, the proposal finds that siloed agency operations, incompatible IT systems, overlapping multi-jurisdictional authority (especially in natural resource and wetlands permitting), and a risk-averse agency culture make processes unduly slow, costly, and uncertain. It recommends five strategic initiatives: adopting a consistent management system across agencies, developing a unified statewide information technology system enabling "one-stop" permitting, aligning the state's various improvement initiatives, assuring accountability while embracing innovation and incentives, and advancing select pilot projects. The report repeatedly identifies industrial land readiness and wetlands mitigation as priority challenges and frames regulatory streamlining as a decade-long effort requiring disciplined executive leadership and coordination across federal, state, and local government.

The Big Look: Final Report to the 2009 Legislature – Oregon Task Force on Land Use Planning (2009)

The Big Look report presents the conclusions of a three-year, legislatively directed review of Oregon's statewide land use planning system, the first comprehensive reassessment since the program began in 1973. Examining the program's effectiveness and the respective roles of state and local governments, the task force found that while Oregon's system has successfully protected farm and forest lands and contained sprawl, it has grown overly complex and rigid over 35 years. Rather than an overhaul, it recommends a set of strategic adjustments, especially a more flexible system that responds to regional variation, stronger incentives for cities and counties to plan cooperatively, and closer coordination of land use with transportation and economic development. It emphasizes that Oregon's land use system remains fundamentally sound but needs greater flexibility, regional coordination, and simplicity to meet future growth, infrastructure, and climate challenges.

Other State Regulatory Approaches

Unlocking Small Multifamily Housing through Building Code Reform – Boston Indicators (2026)

This report examines how Massachusetts's building code regulates small multifamily housing (roughly 3 to 24 units) under the same framework as much larger buildings, raising construction costs in ways that suppress "missing middle" housing. It explains that crossing from two units to three shifts a project from the residential code to the more demanding commercial code, a jump that significantly increases costs and pushes builders toward either single-family homes or very large buildings. Drawing on interviews and reform models from other states, it finds that this two-code system reflects longstanding policy choices rather than proportionate safety needs. Overall, the report recommends creating a dedicated code pathway for small multifamily housing and strengthening the state's code-review capacity, arguing that building code reform, alongside zoning reform, is essential to meeting Massachusetts's housing goals.

Policy Scan: Tools to Increase Housing Production Memo – Legislative Policy and Research Office (2025)

The Oregon Legislative Report on Tools to Increase Housing Production provides a national scan of policies and strategies that could help Oregon address its housing shortage, rising costs, and affordability challenges. Prepared in response to a legislative request, the report reviews approaches from other states across key areas such as zoning reform, financing, modular housing, regulatory streamlining, and targeted programs for specific populations. It finds that increasing density, expanding financial tools, reducing regulatory barriers, and supporting alternative housing types are among the most effective methods for boosting housing supply. Overall, the report highlights a range of adaptable strategies that Oregon could implement to accelerate housing production and improve affordability statewide.

Executive Order 25-02 Assessing Regulatory Efficiency and Addressing Washington's Affordable Housing Crisis (2025)

Executive Order 25-02, issued by Governor Bob Ferguson, directs Washington State agencies to review regulations that may hinder housing development in response to rising housing costs and homelessness. The order requires state agencies to review and streamline rules that may hinder housing development, assess opportunities such as the use of state-owned land, and identify strategies to expand housing supply. It finds that regulatory complexity and limited coordination can constrain housing production and emphasizes the need for faster permitting and stronger interagency collaboration. The order also prioritizes housing-related permits and encourages coordination across agencies, aiming to improve regulatory efficiency and expand housing availability without creating new legal rights or conflicting with existing laws.

Transmittal of State Agency Responses to Executive Order 25-02 – Washington Department of Commerce Housing Division (2025)

The Department of Commerce Housing Division transmitted consolidated responses from state agencies to Executive Order 25-02, which directed agencies to identify regulatory barriers, propose regulatory and non-regulatory strategies, and inventory surplus state land to support the State's housing production goal of 1.1 million new units by 2040. The transmittal memorandum documents the collection process, participation by state entities, the organization of submissions, and the compiled deliverables provided to the Governor's Office.

Pennsylvania Red Tape Reduction: A case study – Institute for Responsive Government (2025)

The Pennsylvania Red Tape Reduction: A Case Study is an evaluative report that analyzes the implementation and outcomes of permitting reforms initiated under Governor Josh Shapiro's Executive Order 2023-07, which aimed to improve the efficiency, transparency, and predictability of permitting, licensing, and certification processes. The document examines how the executive order required agencies to catalog permits, establish processing time targets, and introduce accountability measures such as a fee-refund guarantee for delays, and then assesses how these mandates were carried out in practice. It finds that the reform's success was driven by strong executive leadership, dedicated implementation units, and data-driven performance management, which enabled agencies to identify administrative bottlenecks and significantly reduce processing times. Overall, the report positions Pennsylvania's experience as a case study demonstrating how directive-based reform, supported by coordination, capacity, and process redesign, can reduce administrative burdens and improve government service delivery.

Executive Order 2023-07 – Building Efficiency in the Commonwealth's Permitting, Licensing, and Certification Processes – Pennsylvania (2023)

Executive Order 2023-07, issued by Governor Josh Shapiro, is a statewide directive aimed at improving the efficiency, transparency, and predictability of permitting, licensing, and certification processes across executive agencies. It requires agencies to catalog all permits and related requirements within 90 days, enabling the establishment of standardized processing time targets and a performance framework that may include fee refunds when timelines are exceeded. The order also emphasizes digital modernization to enhance application systems and data tracking, while maintaining compliance with existing legal authorities and constraints. Overall, it establishes a data-driven, accountability-focused approach to streamline administrative processes and support economic activity.

Do Smart Growth Instruments in Maryland Make a Difference? – Rebecca Lewis (2011)

This doctoral dissertation evaluates the effectiveness of Maryland's 1997 "smart growth" legislation, which sought to manage growth by targeting state resources for infrastructure toward designated Priority Funding Areas while steering investment away from rural areas and toward redevelopment. It examines whether spatially targeting state spending actually directed development into the intended areas and discouraged it elsewhere. It finds that the performance of these instruments was mixed and generally modest, largely because implementation was inconsistent and the instruments were poorly integrated with local planning and state budgeting, a coordination failure that limited their influence on where development actually occurred. Overall, it emphasizes that spatially targeted incentives must be carefully aligned with existing state and local processes to be effective, and that where development pressure is strong and local planning weak, state spending alone is unlikely to reshape development decisions.

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Part B: Analytical Framework

This section builds from the framework presented in Chapter 2 of the summary report and provides additional context for how the research team identified the role that state agencies play related to housing production.

State Government Tools that Impact Housing

In some respects, state governments can be thought of as the “middle managers” of housing policy. While states hold broad legal authority, that authority is often delegated to cities. For example, in 1919 the State of Oregon established local zoning authority which is now codified in Oregon Revised Statutes 227.090. While local governments oversee local development review and approval, the state establishes rules that can direct or influence local policy. While cities manage the mechanics of where buildings go and states set the rules of the game, the federal government acts as the chief financier and sets industry standards through tax credits and mortgage insurance to make housing development economically viable while setting national "floor" protections for fair housing and civil rights.

In short, states have a variety of tools they use that can inhibit or enhance housing production. Following is a list of the tools that can be used to achieve desired housing and other policy outcomes:

- **Planning**: establishing strategies for achieving outcomes – either at the state agency level or through requirements for local government planning
- **Funding/Incentives:** giving financial incentives (direct or in-kind) to the private sector to provide the desired public facilities or programs (an alternative to direct public Investment)
- **Investment**: Building or funding public facilities; providing public programs
- **Technical Assistance**: Providing resources and guidance to support planning, funding, and investment efforts
- **Regulation**: Requiring local governments or the private sector to preserve or provide certain public facilities, amenities, environmental resources, or services
- **Coordination**: Getting federal, state, local, nonprofit, and private sector actors to cooperate, and to do so efficiently: not just public-private partnerships, but also public-public partnerships

A core challenge states face in evaluating the direct outcomes of housing related requirements is what urban planning scholars call a “principal-agent” problem.[1] The state (the principal) can require local government (the agent) to adopt and implement housing actions, but the state

[1] William A. Fischel, The Homevoter Hypothesis (Harvard University Press, 2001)

cannot force private or nonprofit developers to building housing units. The missing mechanism here is particularly important: state authority over local government is limited to land-use regulation and planning (which they can mandate), but actual housing production depends on private developers' decisions to build, which neither state nor local government can directly compel.

How State Policies are Created

This study is about how state agency actions affect housing production. But, where do state agency actions come from? In Oregon, state policies are developed through a tiered system that begins with legislative intent (including policy set through legislative actions) and evolves through agency-level planning and formal administrative rulemaking. This process ensures that broad laws passed by the Oregon Legislative Assembly are translated into specific, enforceable regulations while maintaining transparency and public accountability.

State Legislative Actions

State policy is established through the legislative process, where ideas are transformed into statutes by the Oregon Legislative Assembly. This cycle begins when a citizen, state agency, or other entity submits an idea to change, amend, or create a new law is presented to a Legislative Member. The Member decides to sponsor the bill and introduce it to their respective chamber and requests that the attorneys in the Legislative Counsel's office draft the bill in the proper legal language. The bill is then presented to the Secretary of Senate (Senate Chamber) or Chief Clerk of the House (House Chamber), who assigns the bill a number and sends it back to the Legislative Counsel's office to verify it is in proper legal form and style. The bill is then sent to the Legislative Chamber for its first reading.

After the bill's first reading, the Speaker refers it to a committee. The bill is also forwarded to the Legislative Fiscal Officer and Legislative Revenue Officer for the determination of fiscal or revenue impact the measure might have. These committees serve as the primary engine for policy development, holding public hearings to gather testimony from citizens and experts, and conducting "work sessions" to debate and amend the text. For a bill to become law, it must pass both chambers in identical form and be signed by the Governor, ultimately creating the statutory mandate that agencies later refine through their administrative processes.

Agency Planning and Program Development

Before a formal rule is drafted, state agencies engage in internal planning and program development. This phase is often triggered by new legislation or a shifting statewide priority, such as Oregon’s 19 Statewide Planning Goals. Agencies like the Department of Land Conservation and Development (DLCD) or the Department of Environmental Quality (DEQ) assess existing data, define strategic objectives, and design the framework for new programs. During this period, agencies often form Rulemaking Advisory Committees (RACs), which consist of interested parties, subject matter experts, and affected community members who provide early input on the policy's feasibility and potential impact.

Administrative Rulemaking Process

Many policies are established and implemented at the state agency level. Once a policy framework is established, the agency must follow the formal Administrative Procedures Act (APA) to create Oregon Administrative Rules (OARs). These rules have the force of law and clarify how statutes will be implemented. The process officially begins when the agency files a Notice of Proposed Rulemaking with the Secretary of State. This notice must include a "Statement of Need" and a "Fiscal Impact Statement" to explain why the rule is necessary and how much it will cost small businesses or the public. A public comment period follows, often including public hearings where Oregonians can testify or submit written feedback to shape the final language.

Permitting and Implementation

Some policies may require permitting processes, where rules are applied to specific real-world actions. For example, in land use or environmental policy, agencies develop standardized permitting processes that ensure individual projects comply with the overarching OARs. This phase often involves "pre-application" meetings and technical reviews to align private or local actions with state standards. Throughout this entire cycle, the Oregon Department of Justice and Legislative Counsel provide oversight to ensure that the agency's new policies do not exceed the legal authority granted by the legislature.

The Housing Production Process

Housing production can be thought of as a process that requires a broad range of inputs and is affected by a broad range of factors. Housing is often characterized as a bundle of services: shelter, proximity to daily needs (jobs, shopping, recreation), amenities (location, type and quality of internal construction, landscaping, views), prestige, and access to public services (quality of schools, parks). A functioning housing market reflects the housing choices of individual households as influenced by dozens of factors in complex ways.

Moreover, housing production occurs in a dynamic economy that is influenced by a broad array of factors. Increasingly, economists are advocating the view of the economy as a complex adaptive system.[2] In our view, housing markets also exhibit characteristics of complex adaptive systems. IPRE reviewed several housing production frameworks which are summarized here.

Exhibit 1 was used in IPRE's 2022 Barriers to Housing Production report to identify five major categories of factors that affect land prices and production:

- **Category 1 – Supply of Buildable Land**. These barriers relate to government policy that affects which land is buildable, what is allowed to be constructed, and how infrastructure is provided to this land. These barriers affect which land is developable, the allowed density and bulk, what public facility improvements are mandated, and which land is off

[2] **Martin, R. L. (2020)**. When more is not better: Overcoming America's obsession with economic efficiency. Harvard Business Review Press.

limits for development. This category also includes access to public services and infrastructure as well as the financing necessary to extend public services.

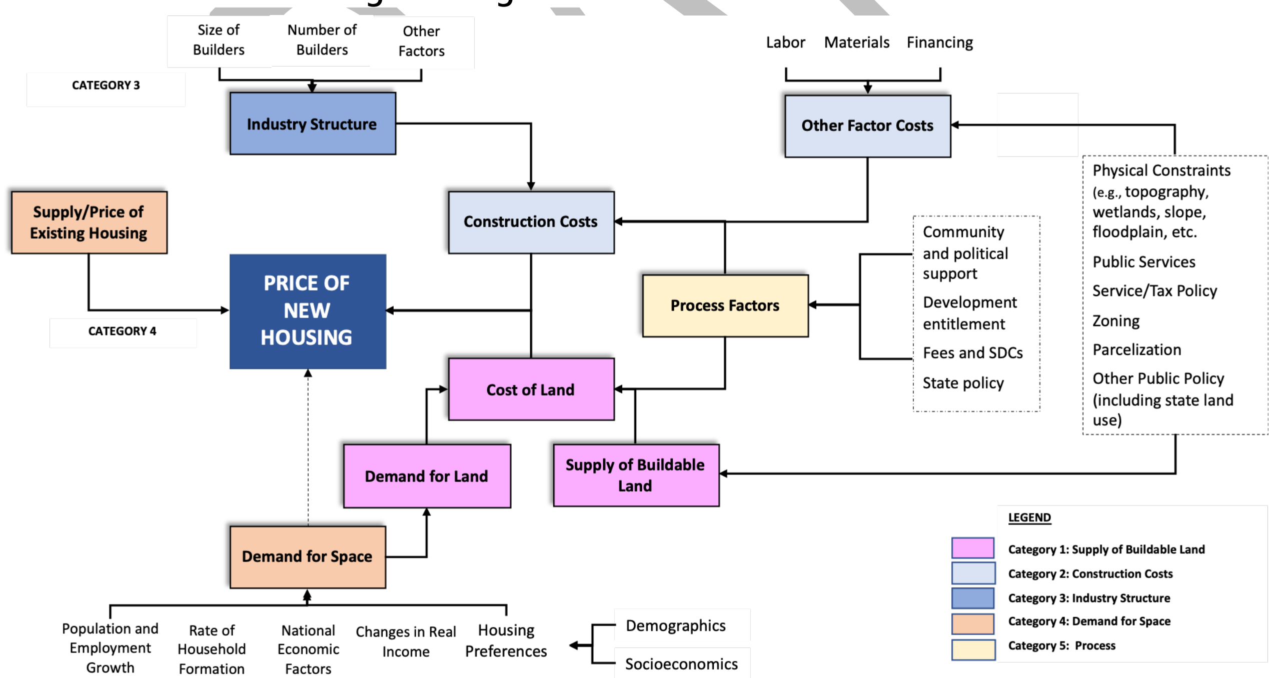
- **Category 2 – Construction Costs Factors**. These barriers relate to the cost of inputs into construction including labor and materials. This also includes access to financing for various types of housing and land development

- **Category 3 – Industry Structure Factors**. This relates to the housing industry and how many developers, builders, and contractors, skilled labor and construction workers exist to build housing. This category also relates to types of development constructed by the development industry in terms of scale and infill versus greenfield.

- **Category 4 – Demand Factors**. These factors relate to the demand side and matching the income and demographic characteristics of residents with the housing supply provided. This category also relates to competition from specific income groups or other types of housing.

- **Category 5 – Process Factors**. These factors relate to the planning process including public hearings, the time and cost of permitting, and the cost of development fees.

Exhibit 1. Factors Affecting Housing Price



Source: IPRE; Adapted from Terry Moore of ECONorthwest

The **Council of Community Housing Organizations (CCHO)**, a San Francisco based housing advocacy organization, developed a useful process diagram on the process of developing a housing unit.[3] CCHO identifies four phases in the process:

- Phase I: Planning Approvals
- Phase II: Financing
- Phase III: Construction
- Phase IV: Post-Construction

ECOnorthwest, an Oregon-based consultant that has assisted DLCD on the Oregon Housing Needs Analysis (ONHA) and other housing projects uses a slightly different framework. This framework, shown in Exhibit 2, has five steps: (1) site selection and land control; (2) project design and permitting; (3) financing; (4) construction; and (5) operations.

Exhibit 2. Housing production process and common public levers at each step

Site Selection + Land Control	Project Design + Permitting	Financing	Construction	Operations
Acquisition / site control	Built form (design/ density)	Grants	Parking Cost	Yield/rentable area
Zoning	Permitting timeline	Loans	Infrastructure cost	Tax abatements
Placemaking*	Permitting fees		Required materials	Reporting requirements
Growth management	SDC fees*		Contracting	Rent subsidies
	Design costs		Certifications	Tenant protections
			Inspections	

Source: ECONorthwest.

Exhibit 3 summarizes the five-phase housing production process IPRE uses for this report. This framework is built from several sources; the five phases in the process are described in more detail below.

[3] **Council of Community Housing Organizations (2019)** *Demystifying the Development Process: How Housing Actually Gets Built.* https://sfccho.medium.com/demystifying-the-development-process-how-housing-actually-gets-built-1fa589d0d111 (last accessed July 22, 2026)

Exhibit 3. Housing Production Process

Phase I: Land Readiness

Key Activities:
- Land added to Urban Growth Boundary (UGB)
- Comprehensive planning within UGB
- Plan designation applied
- Annexation
- Zoning applied
- Environmental reviews
  - Wetland delineation
  - Resource inventories
  - Phase 1 contamination
- Backbone infrastructure provided
  - Functional plans
  - Capital Improvement Plans (CIPs)
  - Funding

Phase II: Project Concept & Feasibility

Key Activities:
- Define project concept
- Conduct market analyses and feasibility studies
- Identify and evaluate potential sites
- Perform initial financial modeling and risk assessment
  - Capital Stacks for subsidized housing
  - Tax exemptions (Multi Unit Property Tax Exemption - MUPTE/Vertical Housing Tax Exemption - VHTE)

Phase III: Pre-development & Permitting

Key Activities:
- Acquire or secure land rights
- Develop detailed site, development, and building plans with architects and engineers
- Secure construction financing
- Obtain permits

Phase IV: Construction

Key Activities:
- Site Preparation: clearing, grading, and excavation
- Foundation: footings /slab, plumbing and electrical
- Framing: walls, and roof trusses
- Rough-Ins: electrical, plumbing, and HVAC systems
- Finishes: drywall, roofing, siding, landscaping

Phase V: Occupancy

Key Activities:
- Final Inspections
- Final Walkthrough
- Securing Permanent Financing (multi-unit housing)
- Certificate of Occupancy (CO)

Note: Some activities span multiple phases

Source: IPRE

Phase 1: Land Readiness

Land is a prerequisite for housing production; however, not all land is ready for development. Sites must be served by adequate infrastructure, and land must be available for purchase or control by developers. Under Oregon's statewide land use planning program, responsibility for ensuring residential land readiness rests largely with municipalities.

Research conducted by the University of Oregon's Institute for Policy Research & Engagement for Business Oregon on industrial land readiness identified three distinct perspectives on land readiness, each associated with different planning time horizons:

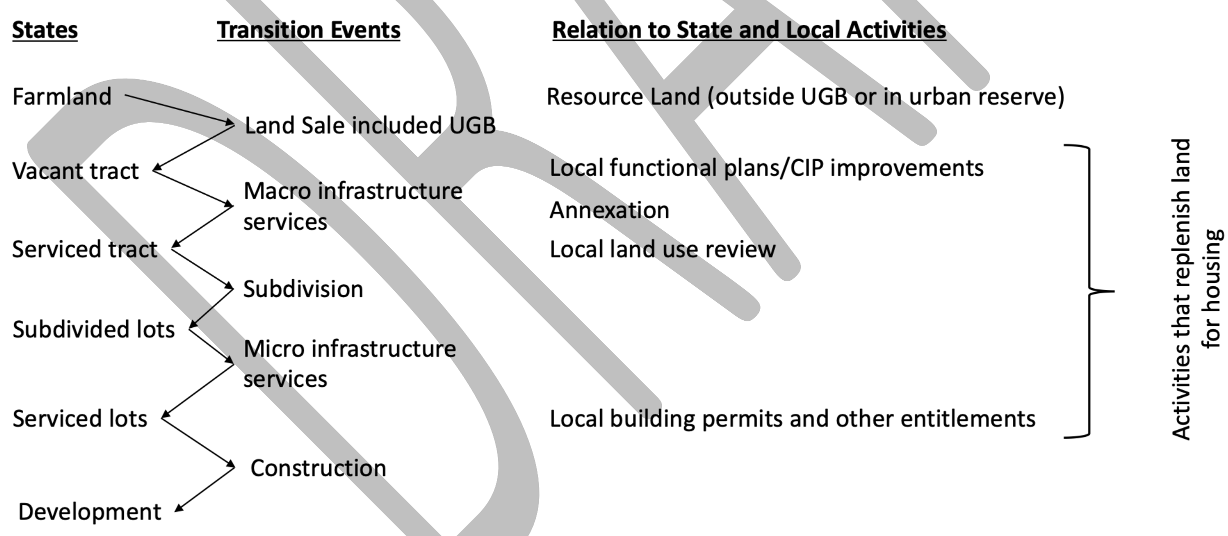
- **Long-Range Planning**. Oregon's land use system requires municipalities to maintain a 20-year supply of buildable land. This perspective reflects the roles of cities and the Department of Land Conservation and Development (DLCD).
- **Site Readiness**. Site readiness refers to the process of preparing land for development through strategic investments in public infrastructure and services. This includes extending backbone infrastructure and coordinating key public facilities. In Oregon, these activities are primarily addressed through Statewide Planning Goal 11 (Public Facilities and Services), Goal 12 (Transportation), related functional plans (e.g., water, wastewater, parks, schools), and capital improvement plans.

- **Site Development**. This perspective reflects the needs of developers or businesses seeking land that is ready for near-term or immediate development.

The importance of aligning these perspectives across timeframes is well documented in the research literature. In Land Market Monitoring for Smart Urban Growth (2001), the authors present a conceptual framework that links different land states to the activities—referred to as "transition events"—that move land from greenfields to developable parcels. Exhibit 4 illustrates this framework, with annotations added to connect the conceptual model to the specific roles and responsibilities of state and local agencies in Oregon.

Under this framework, land development begins with farmland or other large parcels. In Oregon, such land is typically located outside an Urban Growth Boundary (UGB) or within an urban reserve. The first major policy action is a UGB amendment, which places land into what DLCD defines as an "urbanizable" state.[4] A subsequent step may involve annexation into a city. Following annexation, the city typically provides major backbone infrastructure—such as water and sewer mains and arterial transportation access—to the site. Depending on the size and intended use, land may be subdivided and developed in phases or developed as a single large employment or residential project. Most Oregon cities require developers to construct on-site infrastructure improvements as part of the development process.[7]

Exhibit 4. Land States and Transition Events that Lead to Land Readiness for Development



Source: IPRE Barriers to Housing Production Report, 2022; Adapted from Knaap, 2001, Land Market Monitoring for Smart Urban Growth, page 245

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[4] We note that residential development can also occur on lands granted exceptions to Goal 3 or 4 and zoned for rural residential uses.

Phase 2: Project Concept and Feasibility

The second phase of housing development is defined by strategic planning and data gathering. This phase is critical for managing risk for the entire development lifecycle. Developers begin by defining project concepts that align with identified housing needs, particularly for affordable housing initiatives, and conduct thorough market analyses to gauge economic viability.[5] Potential sites are identified and evaluated, and initial financial modeling of the concept is conducted.

While direct regulatory hurdles are less common in this phase, it can be heavily influenced by systemic barriers. The developer's ability to assess housing needs and align with market demand is foundational to a project's success. A project's viability is also dependent on the developer's mission and expertise, which reflects the broader industry structure factors of the development community.[6] A lack of analysis and planning in this initial stage is a primary driver of inefficiency and risk, potentially doubling or tripling costs and deterring investor participation later in the process. This highlights a crucial principle: robust planning is a strategic maneuver to navigate subsequent complexities.

Phase 3: Pre-Development and Permitting

This phase is a complex and often lengthy stage in the housing production process where a project transitions from a concept to a fully-approved plan ready for construction. It involves detailed design work, securing construction financing, and, most critically, obtaining the necessary regulatory approvals and permits.[7] This phase includes site level infrastructure. This phase typically begins after site control has been secured and a development team has been assembled. The primary objective is to obtain all necessary approvals and permits from local, state, and federal authorities to begin construction.

During this phase, developers focus on several key activities.[8] First, they conduct due diligence, which involves a detailed site review, including environmental assessments, geotechnical studies, and a review of zoning ordinances and building codes.[9] This information is used to finalize the project's design and ensure it complies with all applicable regulations.

For subdivisions, the developer will work with engineers and planners to draft a subdivision plat and design infrastructure to local standards. Most communities have specific standards for subdivisions as well as review procedures. Moreover, most communities require on-site

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[5] **Massachusetts Housing Partnership.** (n.d.). *The housing development process*. Housing Toolbox for Massachusetts Communities. https://www.housingtoolbox.org/development-process (Retrieved July 22, 2026)

[6] **Formigle, I.** (n.d.). *The real estate development process—Risks and milestones*. CrowdStreet. https://crowdstreet.com/resources/investment-fundamentals/risks-milestones-real-estate-development-process (Retrieved July 22, 2026)

[7] **Collins, J.** (2019, April 16). *Four key causes of construction project inefficiency*. Innovative Management Solutions. https://ims-web.com/blogs/project-management/four-key-causes-of-construction-project-inefficiency/ (Retrieved July 22, 2026)

[8] **Iskalo Development Corp.** (2021, June 14). *Steps of the pre-development process*. https://iskalo.com/insights/steps-of-the-pre-development-process/ (Retrieved July 22, 2026)

[9] **National Association of Home Builders.** (2019). *Land development checklist*. https://www.nahb.org/~/media/NAHB/advocacy/docs/industry-issues/land-use-101/orientation/land-development-checklist (Retrieved July 22, 2026)

infrastructure to be financed and built by the developer. The site plans will identify the location of buildings. Buildings will be required to conform to local setbacks and other standards.

With respect to structures, architects and engineers create detailed architectural and engineering plans that specify everything from the building's layout and structural design to its mechanical and electrical systems.

These plans are then submitted to the local government's planning and building departments for review. This is where the permitting process begins, often requiring multiple rounds of revisions and public hearings. Securing approvals can be a complex and unpredictable process, with timelines that vary widely based on the project's scale, location, and any public opposition it may face. The successful completion of this phase culminates in the issuance of a building permit, marking the official green light for construction to begin.

Phase 4: Construction

The construction phase proceeds after required site and building plans are completed, development entitlements are in place, and financing is secured. While many pre-development risks are mitigated, construction still presents its own set of challenges. The process is a sequential workflow with key municipal inspections at each stage to ensure quality and code compliance.[10] It begins with site preparation and foundation work, followed by framing, mechanical system rough-ins, and the installation of insulation and drywall. The phase concludes with the application of exterior and interior finishes, and landscaping.

Phase 5: Occupancy

The final phase marks the transition from a construction project to a living dwelling. This stage is contingent upon final inspections and the issuance of a Certificate of Occupancy (CO). The CO formally permits the property to be inhabited and allows its operational phase to commence.[11] For multi-family projects, marketing, leasing, and property management operations are fully established. A critical financial milestone is achieving "stabilization," which allows the short-term construction loan to be paid off by a long-term permanent mortgage.[12]

Housing Production as a System: Regulatory and Process Taxonomy

The discussion above provides a framework for housing development from initial concept to final occupancy. This study focuses on the interaction between state regulation and housing production. A foundational part of this research is the inventory of state policies, programs,

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[10] **Brinkman, M.** (2018, October 22). *Residential building inspection: A step-by-step guide* [Conference session]. ICC 2018 Annual Conference, Richmond, VA, United States. https://cdn-www-v2.iccsafe.org/wp-content/uploads/Residential-Building-Inspection-a-step-by-step-guide.pdf (Retrieved July 22, 2026)

[11] **Oregon Building Codes Division.** (n.d.). *Issuing a certificate of occupancy*. Oregon Department of Consumer and Business Services. https://www.oregon.gov/bcd/epermitting/help/c-of-o/Pages/issuing-c-of-o.aspx (Retrieved July 22, 2026)

[12] **Formigle, I.** (n.d.). *The real estate development process—Risks and milestones*. CrowdStreet. https://crowdstreet.com/resources/investment-fundamentals/risks-milestones-real-estate-development-process (Retrieved July 22, 2026)

procedures, and permits. A taxonomy of policies is useful in organizing the inventory in a manner that allows evaluation of how they interact with housing policy.

- **Land Supply:** This category encompasses issues related to the availability, suitability, and regulatory constraints on land designated or potentially available for residential development.
- **State Financing Programs**: This refers to the accessibility, adequacy, and impact of state-level financial incentives, grants, loans, and tax credits designed to support various stages of housing development, particularly affordable and moderate-income housing.
- **Infrastructure**: This category pertains to the presence, capacity, and funding mechanisms for essential public services and utilities required for new housing developments. This includes water supply, wastewater treatment, stormwater management systems, and transportation networks.
- **Process**: This barrier category addresses the efficiency, predictability, and complexity of administrative procedures, coordination requirements, and inter-agency interactions involved in moving a housing project from concept to completion. It includes planning reviews, inter-agency consultations, and overall project management within governmental frameworks.
- **Permitting**: This involves the timelines, costs, and specific requirements associated with obtaining necessary permits and approvals from state and local authorities at various stages of the development lifecycle, from initial land use approvals to building permits and utility connections.

The inventory uses this taxonomy and was used to inform design of the multi-party survey. The inventory is presented in Part C of this document.

Part C: Policy and Program Inventory

This appendix inventories state programs and policies relevant to housing production and is organized by administering state agency. Programs administered jointly by more than one agency appear under each relevant agency table.

This inventory reflects actions identified through a review of state agency websites, reviewed by HAPO partners, and further refined the State Agency Work Group. The State Agency Work Group coordinated agency review of the draft inventory through the completion of a questionnaire and Phase 1 interviews. IPRE made additional entries when discovered through background research and continued agency and interested party engagement.

An Excel spreadsheet of the policy and program inventory with additional columns detailing source, inclusion of inventory entries within engagement methods, notes on updated entries, related ORS and OAR, and relationship to housing production is maintained separately.

The categories are defined as follows:

- **Plans:** Documents mandated by state or federal law or adopted by administrative decision statutes or administrative rules that dictate infrastructure or housing locations and investments.
- **Finance:** Grants or loans that fund the infrastructure, land development, or housing construction costs directly. This includes planning, design, site acquisition and preparation, engineering, and construction relevant costs. "Shovel-ready."
- **State agency programs:** State agency programs or initiatives that interact with infrastructure, land development, or housing construction. These programs may also administer grants or loans and provide technical assistance or resources. These include federal programs administered at the state level. The administrative and organizational structure that manages specific resources for a defined public purpose.
- **Technical assistance and resources:** Grants or direct support to assist local government or housing producers in planning and policy implementation that create the conditions or the capacity to build housing.
- **Policies and regulations:** State or federal statutes or administrative rules that dictate whether or how infrastructure, land development, or construction occurs or under what appropriate terms and conditions.
- **Procedures and permitting:** Internal agency guidance or guidelines that interpret or implement policies and regulations. Review processes, assessments, permitting.

Oregon Department of Business Development - Business Oregon

Category	Name	Description	Webpage
Finance	Seismic Rehabilitation Grants	The Seismic Rehabilitation Grant Program (SRGP) is a competitive grant offered by the State of Oregon to assist in the seismic retrofit of critical public buildings, including public schools and emergency services facilities such as fire stations, police stations, and hospitals. The program provides up to $2.5 million for eligible projects.	https://www.oregon.gov/biz/programs/srgp/pages/default.aspx
Finance	Brownfields Properties Revitalization Fund	The Brownfields Properties Revitalization Fund (BPRF) assists in the cleanup and redevelopment of contaminated properties (brownfields) to support economic development and environmental health. The program provides funding to address environmental hazards, making sites suitable for reuse. The goal is to revitalize underused properties, promoting community improvement.	https://www.oregon.gov/biz/programs/Brownfields_Properties_Revitalization_Fund/Pages/default.aspx
Finance	Brownfields Redevelopment Fund and Brownfields Cleanup Fund	The Brownfields Redevelopment Fund (BRF) and Cleanup Fund (BCF) provide financial assistance for the assessment and cleanup of brownfield properties to facilitate property redevelopment. The Brownfields program supports the revitalization of contaminated properties that are underutilized due to environmental concerns. The goal is to make these properties viable for reuse, contributing to economic development and community improvement.	https://www.oregon.gov/biz/programs/brownfields/pages/default.aspx
Finance	Community Development Block Grant (CDBG)	The Community Development Block Grant (CDBG) program, administered by the U.S. Department of Housing and Urban Development (HUD) through Business Oregon, provides grants and technical assistance to develop livable urban communities for low- and moderate-income individuals. The program aims to expand economic opportunities and provide housing and suitable living environments.	https://www.oregon.gov/biz/programs/CDBG/Pages/default.aspx
Finance	Housing Infrastructure Support Fund (HISP) Program	The Housing Infrastructure Support Fund (HISF) provides grants to municipalities and technical assistance providers to support infrastructure planning for housing. This includes assistance with water, sewer, stormwater, and transportation infrastructure.	https://www.oregon.gov/biz/programs/HISF/Pages/default.aspx
Finance	Infrastructure Housing Development Projects (IHDP) Program	The Infrastructure Housing Development Projects (IHDP) program provides grants for infrastructure projects that support housing development across Oregon. Allocated through SB 1530 and HB 4134, it targets investments in infrastructure to help increase housing supply statewide.	https://www.oregon.gov/biz/programs/IHDP/Pages/default.aspx
Finance	Housing Infrastructure Financing Program (HIFP)	House Bill 3031 (2025) created the Housing Infrastructure Financing Program (HIFP) and directed the Oregon Infrastructure Finance Authority (IFA), which resides within Business Oregon, to administer the program. The purpose of HIFP is to provide grants, loans and forgivable loans to entities for water, wastewater, stormwater and/or transportation infrastructure for a specified proposed housing development. Initial funding for the program was $10 million in lottery bonds. The bond sale is anticipated to occur in May 2026.	https://www.oregon.gov/biz/programs/HIFP/Pages/default.aspx

Category	Name	Description	Webpage
Finance	Safe Drinking Water Revolving Loan Fund (SDWRLF) - Design, engineering, and construction projects	The Safe Drinking Water Revolving Loan Fund (SDWRLF) offers low-cost financing to public water systems for planning, design, and construction of drinking water infrastructure improvements. The program aims to enhance the quality and accessibility of safe drinking water, particularly for communities in need.	https://www.oregon.gov/biz/programs/sdwrlf/pages/default.aspx
Finance	Special Public Works Fund (SPWF)	The Special Public Works Fund (SPWF) provides low-cost loans and limited grants to municipalities for infrastructure development that supports industrial growth, commercial enterprise, and job creation. Other infrastructure development such as system extensions to serve residential development is an eligible activity as are emergency projects, energy systems, levee certification, and telecommunication systems.	https://www.oregon.gov/biz/programs/spwf/pages/default.aspx
Finance	Sustainable Infrastructure Planning Projects (SIPP) - As part of the SDW	The Sustainable Infrastructure Planning Projects (SIPP) supports water systems with planning activities that promote sustainable infrastructure. This program offers up to $50,000 per project for activities like feasibility studies, asset management plans, water rate studies, and security risk assessments. Priority is given to systems serving fewer than 300 service connections. The funding is provided as a 100% forgivable loan and must be completed within two years.	https://www.oregon.gov/oha/ph/HealthyEnvironments/DrinkingWater/SRF/Pages/sipp.aspx
Finance	Water/Wastewater Fund (WWF) - Infrastructure Project Loan	The WWF provides financial assistance for public infrastructure projects related to drinking water, wastewater, and stormwater systems. It offers below-market loans, reduced interest rates, and partial grants to municipalities, tribes, and other eligible entities. The program is available to help entities in danger of falling into noncompliance with drinking water and water quality regulations.	https://www.oregon.gov/biz/programs/wwf/pages/default.aspx
Finance	Water/Wastewater Fund (WWF) - Planning Grant	The Water/Wastewater Financing Program offers loans and grants for municipalities, tribal councils, ports, and special districts to improve drinking water, wastewater, or stormwater systems. This state-funded program helps achieve or maintain regulatory compliance for these systems.	https://www.oregon.gov/biz/programs/wwf/pages/default.aspx
Finance	Regional Infrastructure Fund	The 2013 Oregon Legislature created the Regional Infrastructure Fund to provide grants and loans to local governments for Regional Solutions implementation projects including long-range planning, research, and design. Business Oregon administers the lottery-funded Regional Infrastructure Fund and established the Grant & Loan Review Committee who makes the final determination of project and award amounts. The committee is comprised of a geographically diverse, odd number of members from the Business Oregon Commission and the IFA Board. At least one member must be a representative from a city and one from a county. In partnership with Regional Solutions.	https://www.oregon.gov/biz/aboutus/boards/regional_infrastructure_fund/pages/default.aspx
Plan	Business Oregon Strategic Plan (2024- 2027)	The Business Oregon Strategic Plan lays out the agency's key priorities and strategies for 2024 - 2027.	https://www.oregon.gov/biz/Publications/OBDD_Strategic_Plan.pdf

Category	Name	Description	Webpage
Plan	Equitable Economic Recovery Plan (2021)	The Economic Recovery Plan was enacted in 2021 to guide Oregon's equitable economy recovery following the COVID-19 pandemic. The plan identified seven key issue areas including broadband, access to capital, workforce innovation, workforce housing, manufacturing, childcare, and systematic improvements.	https://www.oregon.gov/biz/reports/pages/economic-recovery-plan.aspx
Plan	Oregon Statewide Economic Development Strategy (in process)	As directed by the Business Oregon Strategic Plan, Business Oregon is assessing the current state approach to economic development and seeking to leverage those strategies. The strategy builds on Governor Kotek's Prosperity Roadmap. The draft framework is organized into eight distinct action areas. This effort is on-going.	https://www.oregon.gov/biz/aboutus/oreds/pages/default.aspx
Technical Assistance or Resources	Circuit Riders Technical Assistance	The Circuit Rider Program provides technical and engineering assistance to community water systems serving populations under 10,000, and nonprofit transient and non-transient water systems. Through the Drinking Water State Revolving Fund (DWSRF), the program offers short-term assistance, typically under 10 hours, at no cost. Additional state funds support assistance to non-eligible systems, except federally owned ones.	https://www.oregon.gov/oha/ph/healthyenvironments/drinkingwater/operations/pages/circuitrider.aspx
Technical Assistance or Resources	One-Stop Financing Roundtable (Infrastructure)	The One-Stop program, facilitated by Business Oregon, helps communities navigate and access funding solutions for public works projects. Stakeholders, including city managers, engineers, and elected officials, can request a one-stop meeting to discuss potential projects and secure funding. These meetings bring together key agencies and experts to offer financing options and provide guidance on the next steps for the project.	https://www.oregon.gov/biz/Publications/One-Stop.pdf
Technical Assistance or Resources	Regional Service Areas / Regional Development Officers (RDOs)	Business Oregon divides the state into Regional Service Areas, each staffed by a local Regional Development Officer whom businesses and communities can connect with as the starting point to the agency's suite of programs and funding opportunities.	https://www.oregon.gov/biz/aboutus/regions/pages/default.aspx
Procedures or Permitting	Infrastructure Finance Authority (IFA)	The Infrastructure Finance Authority (IFA) Board is a nine-member independent board with oversight of much of Business Oregon's infrastructure financing programs. Six board members are appointed by the Governor, three are direct appointments from the state legislature and treasurer's office. The board has designated a subcommittee for the Community Development Block Grant program.	https://www.oregon.gov/biz/aboutus/boards/ifa/pages/default.aspx

Department of Consumer and Business Services – Building Codes Division

Category	Name	Description	Webpage
Policies or Regulations	Building code adoption processes	BCD works with building code advisory boards to adopt, amend, and interpret the specialty codes that make up the Oregon State Building Code. The process includes code development, board review, rulemaking, and inspector training phases. Updates to Oregon State Building Code are derived from the most appropriate version of the national code, which is updated on a roughly three-year cycle, with Oregon's amendment process beginning approximately midway into each code cycle.	https://www.oregon.gov/bcd/codes-stand/pages/code-adoption.aspx

Category	Name	Description	Webpage
Policies or Regulations	Energy Efficiency Provisions of the ORSC and OSSC	The Oregon Energy Efficiency Specialty Code (OEESC) and Residential Energy Code provisions (Ch. 11 of ORSC) establish energy efficiency standards for the construction and renovation of buildings in Oregon. It is adopted and administered by the Building Codes Division (BCD) under ORS 455.	https://www.oregon.gov/bcd/codes-stand/pages/energy-efficiency.aspx
Policies or Regulations	Oregon Residential Specialty Code (ORSC)	The division works with building officials, technical committees, advisory boards, and the public to adopt, amend, and interpret the Oregon Residential Specialty Code (ORSC). This code applies to the construction, reconstruction, and repair of one- and two-family dwellings and townhouses.	https://www.oregon.gov/bcd/codes-stand/pages/residential-structures.aspx
Policies or Regulations	Oregon Structural Specialty Code (OSSC)	The Oregon Structural Specialty Code (OSSC) establishes the minimum requirements for the construction, reconstruction, alteration and repair of buildings and other structures, as well as the installation of mechanical devices and equipment. The division works with building officials, technical committees, advisory boards, and the public to adopt, amend, and interpret the provisions of the OSSC.	https://www.oregon.gov/bcd/codes-stand/Pages/commercial-structures.aspx
Procedures or Permitting	Manufactured Home Ownership Document System (MHODS)	This is a system for recording the ownership of manufactured homes in Oregon. Since the land beneath the home is owned by the mobile home park but the structure itself is not, the process for recording ownership and transferring ownership is different than typical processes.	https://www.oregon.gov/bcd/man-home-own/Documents/ManHomeOwnDocTransacGuideInteractive.pdf
Procedures or Permitting	Manufactured Home Permit, Inspection and Insignia Application	Facilities where manufactured dwellings are constructed, and each manufactured dwelling, are inspected for compliance with federal regulations and standards	https://www.oregon.gov/bcd/permit-services/Pages/manufactured-dwelling-services.aspx
Procedures or Permitting	Prefabricated Structure Insignia of Compliance	Registered manufacturers of prefabricated structures must apply for an Oregon insignia of compliance if their structures will be installed, or offered for sale, rent, or lease in Oregon. A separate application is required for each Oregon approved plan number, and where projects are intended for different installation locations.	https://www.oregon.gov/bcd/permit-services/Pages/prefab-forms.aspx
Procedures or Permitting	Prefabricated Structure Inspection Request	Each prefabricated structure must have an attached Oregon Insignia of Compliance and be inspected as required by the Oregon Building Codes Division (BCD). Complete this form to request an inspection. Inspections will not be performed unless plans are approved by the BCD.	https://www.oregon.gov/bcd/permit-services/Pages/prefab-forms.aspx
Procedures or Permitting	Prefabricated Structure Plan Review	This form is used to obtain approval from the division of the construction documents for a prefabricated structure.	https://www.oregon.gov/bcd/permit-services/Pages/prefab-forms.aspx
Procedures or Permitting	Building Advisory Boards	There are seven advisory boards that assist the division in carrying out its mission: Board of Boiler Rules, Building Code Structures Board, Construction Industry Energy Board, Electrical and Elevator Board, Mechanical Board, Residential and Manufactured Structures Board, and State Plumbing Board.	https://www.oregon.gov/bcd/boards/Pages/index.aspx
State (Agency) Program	Manufactured Dwelling Design and Construction	The division is responsible for ensuring manufactured dwellings or homes designed and constructed in Oregon meet the U.S. Department of Housing and Urban Development (HUD) standards where the division is the service provider. Inspections and insignias of compliance (HUD tags); Dealer/distributor disclosure statement	https://www.oregon.gov/bcd/permit-services/Pages/manufactured-dwelling-services.aspx

Category	Name	Description	Webpage
State (Agency) Program	Master Plans Program	The Statewide Master Plan Review Program is established in Oregon Revised Statute (ORS) 455.685, as a customer choice optional plan review path to the standard local building department plan review process. This option is intended to improve regulatory efficiencies and may be useful for designs that will be replicated in a specific area, or in multiple areas in Oregon. This optional path does not waive any requirements for obtaining local permits for construction from the local building department. Coordination with the local municipality will help ensure compliance with any applicable local land use laws and any site-specific local requirements necessary for obtaining a building permit.	https://www.oregon.gov/bcd/permit-services/pages/master-plans.aspx
State (Agency) Program	Oregon State Building Codes	The Building Codes Division adopts, amends, and interprets specialty codes that make up the Oregon State Building Code. The division administers each code through specialized code programs. Program staff members work with local building officials, industry professionals, advisory boards, and the public to adopt new codes and standards, approve new methods and materials, and maintain a uniform building code throughout the state.	https://www.oregon.gov/bcd/codes-stand/Pages/index.aspx
State (Agency) Program	Prefabricated Structures Program	The goal of the program is to provide plan review, inspections, and compliance to registered businesses intending to sell, lease, or install prefabricated structures in Oregon. This ensures that construction of prefabricated units complies with Oregon law and building codes.	https://www.oregon.gov/bcd/permit-services/Documents/prefabricated-structures-guide.pdf
State (Agency) Program	Housing Accountability and Production Office	The goal of HAPO is to accelerate the housing production process. It is a partnership between DLCD and BCD and is focused on producing permit ready plans, model codes, and recommendations for streamlining the housing production process.	https://www.oregon.gov/lcd/hapo/pages/hapo.aspx
Technical Assistance and Resources	Building Evaluation Support Agreement (BESA)	The Building Evaluation Support Agreement ("BESA"), is a voluntary agreement that jurisdictions may use to request and share Building Official services between building departments, such as plan review and inspection services.	https://www.oregon.gov/bcd/jurisdictions/pages/besa.aspx
Technical Assistance or Resources	State of Oregon ePermitting	ePermitting is a BCD administered online permit service program. Contractors and homeowners can go online anywhere, or from any device, to purchase a building permit or schedule an inspection. The division also administers the Minor Label Program for minor electrical, plumbing, and elevator installations and repairs.	https://www.oregon.gov/bcd/permit-services/Pages/index.aspx
Technical Assistance or Resources	BCD Building Department Services	The division provides building department services for some counties including Curry, Grant, Morrow, Umatilla, and others on a temporary basis.	https://www.oregon.gov/bcd/permit-services/Pages/index.aspx
Technical Assistance or Resources	Technical Bulletins, Interpretations, and Alternate Methods (BCD)	The Building Codes Division issues technical bulletins, code interpretations, and rulings on alternate methods under ORS 455. These documents provide guidance on code compliance and may affect housing production timelines and design options.	https://www.oregon.gov/bcd/codes-stand/pages/technical-bulletins.aspx
Technical Assistance or Resources	Licensing and Certification Requirements (Building Officials and Inspectors)	ORS 455.715–455.740 establishes licensing and certification requirements for building officials and inspectors in Oregon, governing who may conduct plan reviews and inspections under the statewide building code.	https://www.oregon.gov/bcd/license-cert/Pages/index.aspx

Category	Name	Description	Webpage
Technical Assistance and Resources	Permit Ready Plans Program	The Permit-Ready Plans Program by the Oregon Building Codes Division offers pre-approved, code-compliant building plans for various residential and commercial structures. These plans streamline the permitting process by eliminating the need for extensive plan review, speeding up approval times. Available plans cover structures like decks, post-frame buildings, detached garages, and other common projects. The program is designed to make building simpler and more efficient for both homeowners and contractors. While the plans are ready for use, modifications may require additional local review and approval. The program continues to expand with more plan options.	https://www.oregon.gov/bcd/permit-services/Pages/permit-ready-plans.aspx
Technical Assistance or Resources	Oregon Inspector Training Program	The Oregon Inspector Training Program was established to develop a workforce of skilled inspectors who are knowledgeable about the statewide building code. The state-administered program provides practicum courses for entry-level residential building inspectors.	https://www.oregon.gov/bcd/inspector-training/Pages/index.aspx

Department of Environmental Quality

Category	Name	Description	Webpage
Finance	Clean Water State Revolving Fund (CWSRF)	The Clean Water State Revolving Fund (CWSRF) provides low-interest loans to public agencies and certified nonprofits in Oregon for water quality projects. The program is state-funded, with federal backing through the Environmental Protection Agency (EPA). It supports a wide range of projects, including wastewater treatment, stormwater management, water conservation, and energy efficiency.	https://www.oregon.gov/deq/wq/cwsrf/Pages/default.aspx
Finance	Low-Embodied Carbon Housing Program	Part of Oregon's Climate Equity and Resilience Through Action (CERTA) grant. The Program incentivizes lower-embodied carbon housing production, helping Oregon to meet our climate goals while also addressing the need for more affordable housing.	https://www.oregon.gov/deq/mm/Built%20Environment/Pages/LEChousing.aspx
Plan	DEQ Built Environment Strategic Plan	The Built Environment Strategic Plan marks an expansion and deepening of DEQ's Materials Management approach to strategic planning and builds upon the work of the built environment program over the past ten years.	https://www.oregon.gov/deq/mm/built%20environment/pages/strategic-plan.aspx
Plan	Department of Environmental Quality Strategic Plan 2025- 2027	The DEQ Strategic Plan 2025-2027 sets the agency's overarching direction, identifying five priority goals for the two-year period: building a culture of care, improving tribal relations, prioritizing environmental justice, proactively adapting to address emerging environmental issues, and supporting the Environmental Quality Commission. It establishes the agency's mission, vision, and values and includes measurable actions to guide implementation.	https://www.oregon.gov/deq/about-us/Documents/DEQStrategicPlan2527.pdf
Plan	Materials Management in Oregon - 2050 Vision and Framework for Action	Approved by the Environmental Quality Commission in 2012 (and updated in 2020), this statewide plan establishes a long-term vision for how materials and waste are managed in Oregon, calling for Oregonians to produce and use materials responsibly while conserving resources and protecting the environment. The accompanying Framework for Action is a flexible platform of actions guiding progress toward the 2050 Vision, shifting the state from managing waste to managing materials across their full life cycle.	https://www.oregon.gov/deq/filterdocs/mmanagementor.pdf

Category	Name	Description	Webpage
Plan	Water Quality 2035 Vision and Strategy	The Water Quality 2035 Vision and Strategy (2015) sets an overarching vision for DEQ's Water Quality Program along with vision statements for six sub-program areas and interim goals to track progress toward 2035. It identifies key strategic priorities and work tasks, includes detailed five-year work plans for each sub-program, and aligns water quality program planning with the agency's budget development process.	https://www.oregon.gov/deq/FilterDocs/wqvisstrat.pdf
Policies or Regulations	Water Quality Standards (OAR 340-041)	OAR 340-041 sets Oregon's water quality standards, including designated beneficial uses and numeric/narrative criteria for waterbodies. These standards drive permitting requirements for construction and development activities that may affect water quality.	https://www.oregon.gov/deq/wq/pages/wqstandards.aspx
Policies or Regulations	Heating Oil Tanks Program	The Heating Oil Tank Program handles issues related to: Tanks storing fuel oil (typically Number 1 and 2 diesel oil) to heat buildings for human habitation. Requirements for the voluntary decommissioning of heating oil tanks. Reporting releases from heating oil tanks and the cleanup of soil and groundwater contamination. Rules for contractors working on heating oil tanks and the cleanup of soil contamination.	https://www.oregon.gov/deq/tanks/pages/default.aspx
Policies or Regulations	Total Daily Maximum Load (TMDL)	The federal Clean Water Act requires states, or the U.S. Environmental Protection Agency, to develop a TMDL for each water body on the state's polluted waters list, also known as the 303(d) list (Integrated Report). The TMDL process is just one strategy used to clean up polluted waters.	https://www.oregon.gov/deq/wq/tmdls/Pages/default.aspx
Policies or Regulations	Water Quality Certification (Clean Water Act Section 401)	The 401 Water Quality Certification Program reviews and evaluates the water quality impacts of projects which require a federal permit or license to conduct any activity that may result in a discharge (including dredge and fill material) in waters of the United States under Section 401 of the CWA. Section 401 of the CWA gives states and tribes the authority to issue state water quality certifications for projects that require a federal license or permit that may result in a discharge to waters of the US. The certification states that the discharge will comply with applicable provisions of the CWA, including state water quality standards. Oregon's water quality standards specify the designated use of a waterbody (e.g., for water supply or recreation), pollutant limits necessary to protect the designated use (in the form of numeric or narrative criteria), and policies to ensure that existing water uses will not be degraded by pollutant discharges.	https://www.oregon.gov/deq/wq/wqpermits/pages/section-401.aspx
Policies or Regulations	Onsite Septic Systems Rules (OAR 340-071)	OAR 340-071 governs onsite septic systems (onsite wastewater treatment systems) in Oregon, setting standards for design, installation, and operation. These rules apply where properties cannot connect to public sewer systems.	https://www.oregon.gov/deq/residential/pages/onsite.aspx
Policies or Regulations	Sewer System Construction and Design Standards (OAR 340-052)	OAR 340-052 establishes construction and design standards for sewer systems in Oregon, governing how wastewater infrastructure must be built and what approvals are required before construction.	https://www.oregon.gov/deq/wq/pages/default.aspx

Category	Name	Description	Webpage
Procedures or Permitting	Prospective Purchaser Agreement	A Prospective Purchaser Agreement is a legally binding agreement between DEQ and a prospective purchaser or lessee of real property. A PPA limits the purchaser's or lessee's liability to DEQ for environmental cleanup of the property. In return for this liability release, the PPA must provide the state with a substantial public benefit (see below). The PPA does not provide protection from liability a purchaser or lessee may have under federal law or from liability for any new contamination that may occur after the purchaser or lessee acquires the property. A PPA must be negotiated with DEQ before the purchaser or lessee acquires an interest in the property.	https://www.oregon.gov/deq/hazards-and-cleanup/env-cleanup/pages/prospective-purchaser-agreements.aspx
Procedures or Permitting	No Further Action Determination	DEQ's Cleanup and Leaking Underground Storage Tank (LUST) programs manage a wide variety of sites with different levels and types of contamination from hazardous substances, including petroleum. Some sites may have one contaminant in a small area of shallow soil, while others may have high concentrations of many substances in soil, surface water, sediments or groundwater. A common goal of the Cleanup and LUST programs is to lead these sites to No Further Action (NFA) determinations.	https://www.oregon.gov/deq/FilterDocs/NoFurtherActionDecisions.pdf
Procedures or Permitting	1200 Series Construction Stormwater Permits	This permit is required if construction has the potential to discharge to surface waters or to a conveyance system that leads to surface waters of the state in Oregon and do not have coverage under another NPDES permit. This permit applies to any construction activity and materials or equipment staging and stockpiling that will disturb one or more acres of land or less than one acre of land but is part of a common plan of development or sale that will ultimately disturb one or more acres of land (e.g. subdivisions). This also applies to construction activity that may discharge stormwater to surface waters of the state that may be a significant contributor to pollutants or may cause an exceedance of a water quality standard.	https://www.oregon.gov/deq/wq/wqpermits/pages/stormwater-construction.aspx
Procedures or Permitting	Land Use Compatibility Statement (LUCS)	DEQ uses a LUCS form to determine whether a DEQ permit or approval will be consistent with local government comprehensive plans and land use regulations. A LUCS is required for nearly all DEQ permits and certain approvals of plans or related activities that affect land use prior to issuance of a DEQ permit or approval.	https://www.oregon.gov/deq/permits/pages/lucs.aspx
Procedures or Permitting	MS4 Phase I	A municipal separate storm sewer system, commonly called an MS4, is a conveyance or system of conveyances, such as roads with drainage systems, municipal streets, catch basins, curbs, gutters, constructed channels or storm drains, owned or operated by a governmental entity that discharges to waters of the state. Municipalities that need to obtain an MS4 permit are classified as either a "Phase I" or "Phase II" MS4. Phase I MS4s cover areas with populations greater than 100,000 (large and medium) while regulated Phase II (small) MS4s serve populations less than 100,000 and are located within a Census Bureau designated "urbanized area" (UA). Federal regulations also provide the EPA and the states the discretion to require other MS4s outside of UAs to apply for a permit.	https://www.oregon.gov/deq/wq/wqpermits/pages/ms4-permits.aspx

Category	Name	Description	Webpage
Procedures or Permitting	MS4 Phase II	A municipal separate storm sewer system, commonly called an MS4, is a conveyance or system of conveyances, such as roads with drainage systems, municipal streets, catch basins, curbs, gutters, constructed channels or storm drains, owned or operated by a governmental entity that discharges to waters of the state. Municipalities that need to obtain an MS4 permit are classified as either a "Phase I" or "Phase II" MS4. Phase I MS4s cover areas with populations greater than 100,000 (large and medium) while regulated Phase II (small) MS4s serve populations less than 100,000 and are located within a Census Bureau designated "urbanized area" (UA). Federal regulations also provide the EPA and the states the discretion to require other MS4s outside of UAs to apply for a permit.	https://www.oregon.gov/deq/wq/wqpermits/pages/ms4-permits.aspx
Procedures or Permitting	Wastewater Discharge Permits / NPDES Framework (OAR 340-045)	OAR 340-045 establishes Oregon's wastewater discharge permit framework under the National Pollution Discharge and Elimination System (NPDES), including permits for stormwater discharges from construction activities and municipal systems.	https://www.oregon.gov/deq/wq/wqpermits/pages/default.aspx
Procedures or Permitting	National Pollution Discharge and Elimination System Permits	Oregon's Department of Environmental Quality (DEQ), acting as the EPA-delegated authority under the federal Clean Water Act, administers National Pollutant Discharge Elimination System (NPDES) permits that regulate facilities discharging pollutants from point sources—such as a pipe—into surface waters by establishing pollutant discharge limits, monitoring requirements, and other conditions designed to protect water quality.	https://www.oregon.gov/deq/wq/wqpermits/Pages/WQ-Permitting-Program-Review.aspx
Procedures or Permitting	Septic System Permitting	Onsite septic systems are regulated by the DEQ's Onsite Wastewater Management Program under Oregon Administrative Rules Chapter 340, Division 071, which requires a permit—typically preceded by a site evaluation of the property's soil and groundwater conditions—to install, alter, or repair a system serving buildings not connected to a community sewer, with permitting and inspection carried out either directly by DEQ (in Curry, Jackson, and Josephine counties) or by contracted local government agents in the state's other 33 counties	https://www.oregon.gov/deq/residential/pages/onsite-about.aspx
Procedures or Permitting	Site Assessment (Environmental Cleanup)	Site Assessment Program is tasked with discovering and assessing hazardous substance sites that may require further action to protect health and the environment, ranking sites based on threat to human health and the environment and overseeing limited removal and remedial actions. This program affects construction on or near a known contaminated site. Once a site is cleared for construction, DEQ provides a No Further Action decision. DEQ offers the Voluntary Cleanup program, to provide oversight to property owners and others wishing to investigate and clean up hazardous substance sites in a voluntary, cooperative manner.	https://www.oregon.gov/deq/hazards-and-cleanup/env-cleanup/pages/site-assessment.aspx

Category	Name	Description	Webpage
Procedures or Permitting	Underground Injection Control	An underground injection system places fluids (mainly stormwater, but also water for aquifer storage and recovery, low temperature geothermal return water, treated drinking water and other fluids) below the ground. The most common UIC systems in Oregon are stormwater drywells, which are usually found on large parking lot surfaces or streets. DEQ operates Oregon's UIC Program through authorization from the Environmental Protection Agency. Under this program, DEQ issues permits to UIC system operators, handles enforcement of systems to make sure they are working properly, and conducts rule revisions when program changes are necessary. The program is administered under the Code of Federal Regulations title 40, parts 144 to 146.	https://www.oregon.gov/deq/wq/wqpermits/pages/uic.aspx
State (Agency) Program	Asbestos Program	This program helps homeowners identify and remediate asbestos within their homes. While DEQ does not perform remediation in private residences, they can provide homeowners with advice and put them in contact with licensed professionals.	https://www.oregon.gov/deq/Hazards-and-Cleanup/Pages/Asbestos-for-Homeowners.aspx
State (Agency) Program	Built Environment Program	The Built Environment Program is life cycle program within DEQ's Materials Management Program. The mission of the Built Environment Program is to build relationships, influence policy, and support work that accelerates progress toward eliminating harmful impacts of the built environment, enhancing the well-being of people and place (both natural and human-made), and creating a more just future for all beings. The Built Environment Program includes topics such as housing, embodied carbon, reducing exposure to toxins, infrastructure, space efficiency, reuse, amongst others.	https://www.oregon.gov/deq/FilterDocs/ADU-ResBldgLCA-Report.pdf
State (Agency) Program	Drinking Water Protection Program	The Drinking Water Protection Program, administered by the Oregon Department of Environmental Quality (DEQ), aims to safeguard the state's public drinking water sources from contamination. This initiative works in collaboration with the Oregon Health Authority and focuses on over 2,500 public water systems across Oregon. The program provides technical assistance, resources, and guidance to communities and water suppliers to implement effective source water protection measures.	https://www.oregon.gov/deq/wq/dwp/Pages/default.aspx
State (Agency) Program	Land Quality Program	DEQ Land Quality Programs include hazardous cleanup, solid and hazardous waste, underground storage tanks, and materials management. The program encompasses several core program areas including environmental clean-up, asbestos, tanks program, food waste, brownfields, and materials management, amongst others.	https://www.oregon.gov/deq/pages/land-quality.aspx
State (Agency) Program	Materials Management Program	DEQ's materials management programs help consumers and industry make more sustainable choices for Oregon's future. The State of Oregon has a 2050 Vision in which Oregonians produce and use materials responsibly, conserve resources, protect the environment and live well. To accomplish this, DEQ uses a whole life cycle materials management approach to reduce the impacts of materials we use. Materials management is an approach to serving human needs by using/reusing resources most productively and sustainably throughout their life cycles, generally minimizing the amount of materials involved and all the associated environmental impacts. This approach presents rich and transformative opportunities for DEQ and all Oregonians to better protect our environment. This program area includes recycling, composting, waste prevention, built environment, and material recovery, equity and wellbeing, amongst others.	Department of Environmental Quality : Materials Management Programs at DEQ : Materials Management : State of Oregon

Category	Name	Description	Webpage
State (Agency) Program	Onsite Wastewater Management Program (Septic Systems)	DEQ oversees rules, records, licensing, and permitting for septic systems.	https://www.oregon.gov/deq/residential/pages/onsite.aspx
State (Agency) Program	Regional Brownfields Program	DEQ performs Site-Specific Assessments, including Phase I Environmental Site Assessments, which are funded by EPA and designed to promote redevelopment or property transfer. An SSA generates detailed information on environmental conditions at a site, and provides recommendations and cost estimates for cleanup, as needed. An SSA helps remove environmental stigma from a property by providing information on whether it is contaminated - and to what extent. DEQ addresses concerns about the site in an advisory capacity; neither DEQ nor EPA will require additional action unless an SSA documents an imminent threat to human health or the environment.	https://www.oregon.gov/deq/Hazards-and-Cleanup/env-cleanup/Pages/Brownfields.aspx
State (Agency) Program	Solid Waste Program	DEQ issues solid waste disposal site permits, and other permits related to deconstruction and disposal of materials as part of demolition. This program is within DEQ's Materials Management Program.	https://www.oregon.gov/deq/mm/swpermits/Pages/default.aspx
State (Agency) Program	Water Quality Program	The Water Quality Program's mission is to protect and improve Oregon's water quality. Protecting Oregon's rivers, lakes, streams and groundwater quality keeps these waters safe for a multitude of beneficial uses such as drinking water, fish habitat, recreation and irrigation. Oversees TMDL implementation and monitoring, water quality grants, drinking water protection, clean water state revolving fund, ballast water and invasive species.	https://www.oregon.gov/deq/wq/pages/default.aspx
Technical Assistance or Resources	One-Stop Financing Roundtable (Infrastructure)	The One-Stop program, facilitated by Business Oregon, helps communities navigate and access funding solutions for public works projects. Stakeholders, including city managers, engineers, and elected officials, can request a one-stop meeting to discuss potential projects and secure funding. These meetings bring together key agencies and experts to offer financing options and provide guidance on the next steps for the project.	https://www.oregon.gov/biz/Publications/One-Stop.pdf

Department of Land Conservation and Development

Category	Name	Description	Webpage
Finance	Community Green Infrastructure Program	The Community Green Infrastructure (CGI) Grant Program provides funding for projects that create or enhance green infrastructure, such as parks, rain gardens, urban forests, and wetland restoration. These projects aim to improve environmental quality, public health, and community livability, while addressing climate change and stormwater management. It also supports native seed banks, green infrastructure master plans, and community-based economic development projects.	https://www.oregon.gov/lcd/cgi/pages/default.aspx

Category	Name	Description	Webpage
Plan	Oregon Department of Land Conversation and Development Strategic Plan	This plan covers 2023-2031 and guides the role of DLCD. It aims to promote both economic/community development and the protection of Oregon's working lands, and to uphold Oregon's statewide planning system as the state grapples with new challenges such as housing shortages and more severe natural disasters.	https://www.oregon.gov/lcd/Publications/2023-2031_Strategic_Plan_Signed.pdf
Policies or Regulations	Climate Friendly and Equitable Communities (CFEC)	The Climate-Friendly and Equitable Communities (CFEC) program requires cities and counties in the state's metropolitan regions with populations over 50,000 to update their comprehensive plans, zoning, and transportation system plans by reforming parking mandates, designating walkable mixed-use "Climate-Friendly Areas," and expanding housing and transportation choices, all in order to reduce greenhouse gas pollution from transportation and promote more equitable planning outcomes	https://www.oregon.gov/lcd/cl/pages/cfec.aspx
Policies or Regulations	Oregon Housing Needs Analysis (OHNA)	The Oregon Housing Needs Analysis (OHNA) is the first substantial update to Statewide Planning Goal 10: Housing since its establishment over 50 years ago. The OHNA framework establishes a coordinated statewide approach to housing planning that focuses on equitable outcomes and fair housing principles, a data-driven methodology for estimating housing need, and more state support.	https://www.oregon.gov/lcd/housing/Pages/ohna.aspx
Policies or Regulations	Urban Growth Boundary (UGB) Statutes	An urban growth boundary is expanded through a joint effort involving the city and county, and in coordination with special districts that provide important services in the urban area. A city must first determine how much land is needed for urban development over the next 20 years and if the city can reasonably accommodate that need within the existing urban growth boundary. If there is not enough land, the city may expand its urban growth boundary while avoiding farm and forest land to the greatest extent reasonable. Once land is included in an urban growth boundary, it is eligible for annexation to a city. Adding land to an existing city limit through annexation is required to be consistent with a City and County's Urban Growth Management Agreement. Annexations and application of urban zoning actions require a post-acknowledgement plan amendment.	https://secure.sos.state.or.us/oard/displayDivisionRules.action?selectedDivision=3074
Policies or Regulations	Urban Growth Boundary (UGB) Streamlining (Division 38 rule)	The methods described in this division are intended to achieve the following objectives provided in ORS 197A.302: Become, as a result of reduced costs, complexity and time, the methods that are used by most cities with growing populations to manage their urban growth boundaries; (b) Encourage, to the extent practicable given market conditions, the development of urban areas in which individuals desire to live and work and that are increasingly efficient in terms of land uses and in terms of public facilities and services; (c) Encourage the conservation of important farm and forest lands, particularly lands that are needed to sustain agricultural and forest products industries;(d) Encourage cities to increase the development capacity within their urban growth boundaries;(e) Encourage the provision of an adequate supply of serviceable land that is planned for needed urban residential and industrial development; and (f) Assist residents in understanding the major local government decisions that are likely to determine the form of a city's growth.	https://secure.sos.state.or.us/oard/displayDivisionRules.action?selectedDivision=3088

Category	Name	Description	Webpage
Policies or Regulations	Contextualized Housing Need (CHN)	The Contextualized Housing Need (CHN) is a community's assessment of its housing needs. The CHN ground-truths its allocated housing need and production target through the lens of Affirmatively Furthering Fair Housing.	https://www.oregon.gov/lcd/Housing/Pages/Planning_Program.aspx; https://www.oregon.gov/lcd/Housing/Documents/2026_v2_Housing_Explainer_CHN.pdf
Policies or Regulations	Housing Capacity Analysis (HNA)	A Housing Capacity Analysis (HCA), formerly called a Housing Needs Analysis (HNA), determines whether a community has enough buildable residential land to support its housing needs over the next 20 years.	https://www.oregon.gov/lcd/Housing/Pages/Planning_Program.aspx; https://www.oregon.gov/lcd/Housing/Documents/2026_v2_Housing_Explainer_HCA.pdf
Policies or Regulations	Housing Coordination Strategy (HCS)	A Housing Coordination Strategy (HCS) is a regional action plan that is similar in structure to a local HPS, but distinct in that it reflects actions across the region. The HCS includes a list of actions including policies, programs, or coordinated efforts that the regional entity will undertake to promote housing production, affordability, and choice across the communities in the region. (Required for Metro)	https://www.oregon.gov/lcd/Housing/Pages/Planning_Program.aspx
Policies or Regulations	Housing Production Strategy (HPS)	Oregon's Housing Production Strategy (HPS) requirement, established under ORS 197A.015 and OHNA rulemaking, requires certain cities to adopt strategies for producing needed housing types. Cities must identify and adopt actions to implement their housing need findings from the OHNA process.	https://www.oregon.gov/lcd/housing/pages/hps.aspx
Policies or Regulations	Middle Housing (HB 2001 / ORS 197A.420 / OAR 660-046)	House Bill 2001 (2019) and subsequent rules (OAR Chapter 660, Division 46) require cities above certain population thresholds to allow middle housing types—including duplexes, triplexes, quadplexes, townhouses, and cottage clusters—in areas zoned for single-family residential use.	https://www.oregon.gov/lcd/housing/pages/middle-housing.aspx
Policies or Regulations	Statewide Planning Goals (Goals 1–19)	Oregon's 19 Statewide Planning Goals, established under ORS 197 and OAR Chapter 660, form the foundation of the state's land use planning system. They address land use, economic development, housing, transportation, natural hazards, and conservation of natural resources.	https://www.oregon.gov/lcd/OP/Pages/Goals.aspx
Policies or Regulations	Development-Ready Land Inventory (DRLI)	The Development-Ready Land Inventory (DRLI) is an emerging practice under ORS 197A.210 and the OHNA framework. It tracks land within UGBs that is suitably zoned, serviced, and available for near-term residential development, informing housing capacity analysis.	https://www.oregon.gov/lcd/housing/Pages/ohna.aspx
Policies or Regulations	Recent Legislative Reforms (SB 1537, SB 974, HB 3395)	A series of recent legislative reforms have significantly changed Oregon housing law: SB 1537 (2024) created the MIRL program and other housing tools; SB 974 (2025) addressed housing production; HB 3395 (2023) made changes to housing approvals. These laws affect planning, permitting, and financing of housing statewide.	
Policies or Regulations	Goal 5 / Local Wetland Inventories (OAR 660-016, 660-023, 141-086)	Statewide Planning Goal 5 and its implementing rules (OAR 660-016, 660-023, and 141-086) require local governments to inventory and protect natural resources including wetlands and riparian areas. Local wetland inventories trigger the DSL notification and permitting process for new development.	https://www.oregon.gov/lcd/OP/Pages/Goal5.aspx

Category	Name	Description	Webpage
Policies or Regulations	OAR 660-012-0010 (Transportation System Planning vs. Project Development)	OAR 660-012-0010 defines the distinction between transportation system planning (the long-range planning process) and project development (design and construction), a key procedural boundary in Oregon's coordinated land use and transportation planning framework.	https://secure.sos.state.or.us/oard/displayDivisionRules.action?selectedDivision=3062
Policies or Regulations	OAR 660-012-0060 ('Significant Effect' Test for Plan/Zone Amendments)	OAR 660-012-0060 establishes the 'significant effect' test that local jurisdictions must apply when evaluating whether proposed comprehensive plan amendments or zone changes will significantly affect a transportation facility, triggering mitigation requirements.	https://secure.sos.state.or.us/oard/displayDivisionRules.action?selectedDivision=3062
Policies or Regulations	Post-acknowledgement Plan Amendment (PAPA)	Post-Acknowledgment Plan Amendment (PAPA) is any change a city or county makes to its already-acknowledged comprehensive plan, supporting plans, or implementing land use regulations, and state law (Oregon Administrative Rules Chapter 660, Division 018) requires the local government to notify the Department of Land Conservation and Development (DLCD)—generally by filing a notice of proposed change at least 35 days before the first evidentiary hearing and again upon adoption, typically through the PAPA Online tool—so that DLCD can provide weekly public notice and review the amendment for consistency with Oregon's statewide planning goals	https://www.oregon.gov/lcd/cpu/pages/plan-amendments.aspx
Policies or Regulations	Exception Lands vs. Resource Lands Prioritization (Goal 14 Rules)	Statewide Planning Goal 14 rules govern how cities prioritize land types when expanding urban growth boundaries, requiring that exception lands (already committed to non-resource use) be considered before farm or forest resource lands.	https://www.oregon.gov/lcd/up/pages/urban-planning.aspx
Policies or Regulations	Transportation Planning Rule	The Transportation Planning Rule (OAR 660, Division 12) implements Statewide Planning Goal 12 (Transportation) and directs transportation planning in coordination with land use planning. It requires most cities and counties to prepare and adopt transportation system plans as part of their comprehensive plans and includes provisions (such as Section 0060) requiring jurisdictions to assess whether proposed plan amendments or zone changes will significantly affect the transportation system.	https://secure.sos.state.or.us/oard/displayDivisionRules.action?selectedDivision=3062
Procedures or Permitting	Land Conservation and Development Commission	Oregon's Land Conservation and Development Commission (LCDC), assisted by the department, adopts state land-use goals and implements rules, assures local plan compliance with the goals, coordinates state and local planning, and oversees the coastal zone management program.	https://www.oregon.gov/lcd/Commission/Pages/index.aspx?utm_medium=email&utm_source=govdelivery
Procedures or Permitting	DLCD Regional Representatives	The DLCD regional representatives (reps) are a vital link to the local communities around the state. Each has broad knowledge of land use planning in specific geographic areas, as well as department rules and procedures. They help local officials and the public better understand the statewide planning goals, and related land use rules and regulations in Oregon. The reps participate on the Governor's regional solutions teams as key participants focused on problem-solving and solution-oriented projects.	https://www.oregon.gov/lcd/CPU/Pages/Regional-Representatives.aspx

Category	Name	Description	Webpage
Procedures or Permitting	Periodic Review	Periodic Review is a term used in Oregon law to describe the periodic evaluation and revision of a local comprehensive plan. Since 1981, state law (ORS 197.628 - 636) has called for cities and counties to review their comprehensive plans according to a periodic schedule established by the Land Conservation and Development Commission (LCDC). In 2007, the legislature revised the requirements of Periodic Review to include only those cities with a population greater than 10,000. Also, the legislature scaled back the requirements of periodic review to include only the fundamental building blocks of local planning. Comprehensive plans must make adequate provisions for economic development, needed housing, transportation, public facilities and services, and urban growth. LCDC has not adopted a periodic review schedule in recent years due to lack of regular funding.	https://www.oregon.gov/lcd/CPU/Pages/Periodic-Review.aspx
State (Agency) Program	Urbanization Planning Program	DLCD's urban planning work implements Statewide Planning Goal 14 (Urbanization), which provides for an orderly and efficient transition from rural to urban land use. Every Oregon city maintains an urban growth boundary (UGB) designating where it expects to grow over a 20-year period; DLCD provides technical assistance, reviews UGB amendments, and helps cities plan for housing, employment, transportation, and public facilities within the boundary.	https://www.oregon.gov/lcd/up/pages/urban-planning.aspx
State (Agency) Program	Housing Accountability and Production Office	The goal of HAPO is to accelerate the housing production process. It is a partnership between DLCD and BCD and is focused on producing permit ready plans, model codes, and recommendations for streamlining the housing production process.	https://www.oregon.gov/lcd/hapo/pages/hapo.aspx
State (Agency) Program	Housing Program	DLCD's Housing Program works with local governments to plan for and increase the production of housing to meet Oregonians' needs in a more affordable, fair, and equitable way.	https://www.oregon.gov/lcd/Housing/Pages/index.aspx
State (Agency) Program	Oregon Land Use Planning Program	Oregon's statewide land use planning program — originated in 1973 under Senate Bill 100 — balances the protection of farm, forest land, and the conservation of natural resources, with the orderly development and formation of livable communities. Oregon's land use planning program encourages and supports coordination among local government and enables community engagement at each step of a land use decision-making. Under the program, all cities and counties have adopted comprehensive plans that meet mandatory state standards. The standards are based on the 19 Statewide Planning Goals that address land use, economic development, housing, transportation, natural hazards, and conservation of natural resources. Technical assistance in the form of expertise and grants to local governments are key elements of the program.	https://www.oregon.gov/lcd/OP/Pages/Goals.aspx
State (Agency) Program	Transportation Growth Management Program	Transportation and Growth Management (TGM) is a joint program of DLCD and ODOT working to create thriving, livable places with diverse transportation choices. TGM programs include Code Assistance, Quick Response, Education and Outreach, TSP Assessment, and Parking Reform and Management. TGM also provides technical assistance and resources to local governments.	https://www.oregon.gov/lcd/TGM/Pages/About.aspx

Category	Name	Description	Webpage
Technical Assistance or Resources	National Flood Insurance Program	DLCD provides general technical assistance, conduct community assistance visits or contacts, offer training, and answer general questions on floodplain management and mapping at the state level. DLCD helps cities, counties, and tribes participate in the National Flood Insurance Program (NFIP) and prepare communities for flooding. Through the National Flood Insurance Program, the Federal Emergency Management Agency (FEMA) provides insurance to property owners, renters, and businesses for physical damage caused by floods.	https://www.oregon.gov/lcd/NH/Pages/NFIP.aspx
Technical Assistance or Resources	HAPO Technical Assistance Funds	Grant funding to local governments to comply with housing laws, reduce permitting and land use barriers to housing production, and support reliable and effective implementation of local procedures and standards relating to the approval of residential development projects.	https://www.oregon.gov/lcd/Housing/Documents/HAPO_Technical_Assistance_Funding_Policy.pdf
Technical Assistance or Resources	Housing Planning Assistance	Grants to help Oregon communities prepare and update local land use plans and implement ordinances that respond to identified housing needs, growth management, and resource protection issues.	https://www.oregon.gov/lcd/housing/pages/assistance-funding.aspx
Technical Assistance or Resources	Wetland Technical Assistance Grants	Funded by Senate Bill 5528 (which appropriated $500,000 to DLCD for the 2025-2027 biennium), these grants support wetland-related planning work that facilitates housing development on buildable lands. Grant sizes vary based on the type of planning work proposed, helping local governments balance wetland resource protection with the need to plan for housing production.	https://www.oregon.gov/lcd/about/pages/grants.aspx
Technical Assistance or Resources	Code Assistance (TGM)	The Code Assistance program offers local governments support in updating development regulations to promote sustainable land use and transportation. This includes designing multi-modal transportation systems, increasing walking and biking access, and improving urban growth management. Projects can be completed in one or two phases, focusing on code amendments or evaluation of current regulations.	https://www.oregon.gov/lcd/TGM/Pages/Code-Assistance.aspx
Technical Assistance or Resources	Education and Outreach (TGM)	The Education and Outreach program under the Transportation and Growth Management (TGM) initiative offers workshops, lectures, conferences, and publications to support Oregon local governments with transportation and land use planning. These resources help communities address challenges like urban design, transportation networks, housing development, and downtown revitalization, aiming to foster sustainable and livable communities.	https://www.oregon.gov/lcd/TGM/Pages/Education-Outreach.aspx
Technical Assistance or Resources	Parking Reform and Management (TGM)	The Parking Reform and Management program helps Oregon local governments address parking challenges, especially in downtown areas. It supports the development of parking management plans and the reduction or elimination of off-street parking mandates. This reform improves housing availability, supports businesses, reduces climate pollution, and enhances transportation safety. The program is typically conducted in phases with both data collection and the development of actionable plans.	https://www.oregon.gov/lcd/TGM/Pages/Parking-Reform-and-Management.aspx
Technical Assistance or Resources	Quick Response Program (TGM)	The Quick Response Program assists local governments and special districts in implementing transportation and land use plans. It supports small-scale, short-term projects that bridge long-range planning and development readiness. These projects often focus on multi-modal transportation improvements and are intended to facilitate development within three years.	https://www.oregon.gov/lcd/TGM/Pages/Quick-Response.aspx

Category	Name	Description	Webpage
Technical Assistance or Resources	TGM Planning Grants	The TGM Planning Grants provide funding to Oregon local governments for transportation and land use planning projects that promote sustainable, multi-modal transportation systems. These grants support the integration of land use and transportation planning to create more livable, accessible, and economically viable communities.	https://www.oregon.gov/lcd/TGM/Pages/Planning-Grants.aspx
Technical Assistance or Resources	Transportation System Plan Assessment (TGM)	The Transportation System Plan (TSP) Assessment helps local governments evaluate their existing transportation system plans for potential updates. The TSP assessment reviews the current plan against Oregon's requirements and projected needs, identifying strengths, weaknesses, and areas for improvement. The assessment provides guidance for future updates and helps localities prepare for grant applications.	https://www.oregon.gov/lcd/TGM/Pages/TSP-Assessment.aspx
Technical Assistance or Resources	Urban Growth Boundary Expansion Planning Grant	These grants will support local governments in completing the comprehensive planning for land within a city's urban growth boundary that is not yet annexed and requires annexation to facilitate development.	https://www.oregon.gov/lcd/About/Pages/Grants.aspx
Technical Assistance or Resources	Technical Assistance Grants	The Technical Assistance (TA) grants are competitive awards to local communities that fund projects to update a comprehensive plan, to update local land use ordinances, or other planning compliance projects. The grants must align with the priorities provided in DLCD's Grants Allocation Plan.	https://www.oregon.gov/lcd/cpu/pages/community-grants.aspx

Department of State Lands

Category	Name	Description	Webpage
Plan	Oregon Department of State Lands Strategic Plan 2022- 2027	The Department of State Lands 2022-2027 Strategic Plan sets the agency's direction and priorities over the five-year period and guides its work managing state-owned lands and waterways, protecting wetlands and waters, and generating revenue for the Common School Fund. The agency reports annually on progress toward the plan's projects and goals.	https://www.oregon.gov/dsl/Documents/DSL_22-27_StrategicPlan.pdf
Plans	Advance Aquatic Resource Plans	Advance Aquatic Resource Plans (AARPs) offer a flexible framework for cities, counties, and community groups to plan ahead for future projects within large areas of developable land that may be constrained by the presence of wetlands. The plans help communities balance the need for wetland resource protection with economic development, and require a sponsoring community to work with agencies, jurisdictions, landowners, and other parties to agree on plan objectives and content.	https://www.oregon.gov/dsl/wetlands-waters/Pages/local-gov-planning.aspx%20%20https://www.oregon.gov/dsl/wetlands-waters/Documents/AdvanceAquaticResourcePlans.pdf
Policies or Regulations	Compensatory Wetland Mitigation	Projects likely to permanently impact or remove wetlands or waters require compensatory mitigation to compensate for the loss of societal and environmental benefits. Department staff work with permit applicants to explore alternative site designs and locations to avoid or minimize impacts.	https://www.oregon.gov/dsl/wetlands-waters/pages/mitigating-impacts.aspx
Policies or Regulations	Approval of Local Wetlands Inventory	DSL conducts technical reviews of local wetland inventories, prepared by local jurisdictions under state land use Goal 5, and issues approval. Once approved, the LWI is incorporated into the statewide wetlands inventory and must be used in lieu of the national inventory for wetland land use notifications.	https://www.oregon.gov/dsl/wetlands-waters/pages/local-gov-planning.aspx

Category	Name	Description	Webpage
Policies or Regulations	State Wetlands Inventory	DSL maintains a Statewide Wetlands Inventory web map that displays the approximate locations of wetlands and waters throughout Oregon. The map also shows areas where soil is likely to be wetter longer, indicating there may be unmapped wetlands present. SWI web map data sources are described in detail in the SWI Map Layer Descriptions and Limitations document. Site determinations and delineations are part of the SWI but are not available digitally. In 2025 DSL began receiving GIS with delineation submittals.	https://www.oregon.gov/dsl/wetlands-waters/Pages/inventories-maps.aspx
Policies or Regulations	Local Wetlands Inventory	Professional consultants and local governments have created inventories of wetlands and waters in various areas throughout Oregon. These inventories identify approximate locations of wetlands and waters. There may be unmapped wetlands or waters in these areas that are still regulated. More accurate LWI wetlands and waters mapping may replace the SWI map national layers within the study area of the LWI. LWI mapping is for planning purposes. DSL approved wetland delineation mapping supersedes LWI mapping and is required for state Removal-Fill (and federal Clean Water Act) permits.	https://www.oregon.gov/dsl/wetlands-waters/Pages/inventories-maps.aspx https://www.oregon.gov/dsl/wetlands-waters/Documents/DSLSWILayerLimitations.pdf
Policies or Regulations	Wetland Determination	An offsite determination consists of reviewing wetlands and soils maps, aerial photos and other information to determine if wetlands or other regulated water bodies (such as creeks) are present, likely to be present, or unlikely to be present. An onsite determination by DSL, can verify whether there are regulated wetlands on a site. As capacity allows, DSL staff may be available for a requested or DSL recommended site visit, however, DSL requires signed authorization to access the property by the owner or legal agent, as well as a fee.	https://www.oregon.gov/dsl/wetlands-waters/pages/identification.aspx
Policies or Regulations	Wetland Land Use Notices	Cities and counties are required by law to submit a Wetland Land Use Notification Form to DSL within five days of receiving a local land use application if an activity is proposed on a parcel within or partially within resources identified on the State Wetlands Inventory, or wetlands or waters on the applicable Local Wetlands Inventory maps. The purpose of this notice process is to provide notification to landowners and local governments about the need for delineation, a removal-fill permit, and prevent unintentional violations of the Removal-Fill Law.	https://www.oregon.gov/dsl/wetlands-waters/pages/local-gov-planning.aspx
Policies or Regulations	Removal-Fill Law (ORS 196.600–196.990 / OAR 141-085, 141-090, 141-093)	Oregon's Removal-Fill Law (ORS 196.600–196.990) and associated DSL rules (OAR 141-085, 141-090, 141-093) regulate activities that remove, fill, or alter wetlands and waters of the state. Permits are required for significant ground-disturbing activities in regulated areas.	https://www.oregon.gov/dsl/wetlands-waters/pages/removal-fill.aspx
Procedures or Permitting	Land Sales and Exchanges	Approximately 1.5 million acres of surface and subsurface lands across Oregon are managed by the Department of State Lands. The Department occasionally sells and exchanges land owned by DSL for full market value to maximize revenue contributed to the Common School Fund. DSL also conducts planning activities on some large parcels of land with the potential to be developed for industrial, commercial, and residential use, the proceeds from which benefit the Common School Fund. Generally, it is the policy of the State Land Board to retain mineral rights. DSL also processes some land transactions on behalf of other state agencies.	https://www.oregon.gov/dsl/lands/Pages/land-sales.aspx

Category	Name	Description	Webpage
Procedures or Permitting	Removal Fill Permit	Required for projects that add, remove, or move more than 50 cubic yards of material in most wetlands or waters, projects that add, remove, or move any amount of material in essential salmonid habitat, Oregon state waterways, and adjacent lands within a quarter mile of waterways, and designated mitigation sites.	https://www.oregon.gov/dsl/wetlands-waters/pages/removal-fill.aspx
Procedures or Permitting	Wetland Delineation	If wetlands or waters have been detected on a site, the next step is to work with a professional consultant to identify the boundaries of the protected resource. Delineating boundaries helps determine where a project could potentially impact a resource. When wetlands or waters are present, a delineation report needs to be submitted. The report combines site mapping with other information, like site history and characteristics. Delineation reports are prepared by environmental consultants who assess the site and submit the report to DSL for review and approval. Approved report findings are typically valid for five years unless new information necessitates revision. The DSL approval letter will describe the criteria under which a removal-fill permit will be required for projects within the wetlands and waters.	https://www.oregon.gov/dsl/wetlands-waters/Pages/Identification.aspx
Technical Assistance and Resources	Technical Assistance (DSL)	DSL provides land use planning assistance to cities and counties to help meet Statewide Land Use Planning Goals, particularly Goal 5 (Natural Resources). The Department's aquatic resource planner coordinates with DLCD to offer both technical and planning assistance to local governments completing wetland inventories and related tasks, including working with wetland consultants, participating in public meetings, and giving educational presentations on wetland inventories, wetland land use notices, and DSL's regulatory programs.	https://www.oregon.gov/dsl/wetlands-waters/Pages/local-gov-planning.aspx
Technical Assistance or Resources	State owned or managed lands inventory	DSL maintains maps and an inventory of state-owned and state-managed lands, including rangelands, agricultural lands, forest lands, and other parcels managed on behalf of the Common School Fund. The inventory provides public access to information on the location and status of these lands.	https://www.oregon.gov/dsl/lands/pages/maps-inventory.aspx

Oregon Department of Transportation

Category	Name	Description	Webpage
Finance	Carbon Reduction Program	The Carbon Reduction Program, established by the Bipartisan Infrastructure Law, allocates $82 million over five years to fund projects that reduce greenhouse gas emissions from transportation in Oregon. The program prioritizes transportation solutions such as cleaner vehicle infrastructure and multimodal projects, especially in small urban and rural areas. The Oregon Department of Transportation (ODOT) manages the funding and project selection, with significant funds set aside for local and tribal governments.	https://www.oregon.gov/odot/climate/pages/carbonreductionprogram.aspx
Finance	Community Charging Rebates Program	The Community Charging Rebates Program offers rebates to support the installation of Level 2 electric vehicle (EV) charging stations at strategic locations in Oregon. The program targets public parking areas, workplaces, and multi-family housing to expand EV infrastructure, particularly in underserved and rural communities.	https://www.oregon.gov/odot/climate/pages/communitychargingrebates.aspx

Category	Name	Description	Webpage
Finance	Connect Oregon	This program has been used to fund bicycle, pedestrian, and transit projects, although its main purpose is to finance the construction of marine, rail, and aviation transport. Eligible programs include land acquisition, capital construction costs, new or renovation of existing buildings, equipment with a 20-year useful life (must remain with the project), and design and engineering professional services	https://www.oregon.gov/odot/Programs/Pages/ConnectOregon.aspx
Finance	Innovative Mobility Program	The Innovative Mobility Program (IMP) seeks to enhance access to public and active transportation in underserved communities across Oregon. Funded by the Bipartisan Infrastructure Law and state dollars, it aims to reduce car trips, greenhouse gas emissions, and improve transportation equity. It offers grants to support shared mobility services, infrastructure improvements, and educational programs.	https://www.oregon.gov/odot/rptd/pages/innovative-mobility-program.aspx
Finance	Oregon Community Paths Program	The Oregon Community Paths Program (OCP) funds the development, reconstruction, and major improvements of multiuse paths to enhance walking and biking access. It focuses on projects that improve active transportation safety and connectivity, supporting Oregon's multimodal transportation goals. The program is funded through both state and federal sources and promotes community connections by expanding and maintaining these transportation routes.	https://www.oregon.gov/odot/Programs/Pages/OCP.aspx
Finance	Safe Routes to Schools - General Funding	The Safe Routes to School (SRTS) Program aims to improve safety and increase active transportation for children traveling to and from school. It provides funding to support infrastructure improvements, education programs, and encouragement initiatives that promote walking and biking. This program is designed to reduce traffic-related injuries, promote physical activity, and make walking and biking safer for students.	https://www.oregonsaferoutes.org/find-funding/
Finance	Statewide Transportation Improvement Fund	The Statewide Transportation Improvement Fund (STIF) program was established in Section 122 of House Bill 2017 to provide a dedicated source of funding for improving, maintaining, and expanding public transportation for all users. Every two years, public transportation funding is made available to support access to jobs, improve mobility, relieve congestion, and reduce greenhouse gas emissions in Oregon.	https://www.oregon.gov/odot/RPTD/Pages/Statewide-Transportation-Improvement-Fund.aspx
Finance	Oregon Transportation Infrastructure Bank	The Oregon Transportation Infrastructure Bank (OTIB) is a statewide revolving loan program designed to provide financial assistance for transportation projects. Established in 1996 and formally enacted in 1997, it offers innovative financing solutions to address the state's transportation infrastructure needs. Allowable activities for funding include the construction, maintenance, and improvement of transportation infrastructure, such as roadways, bridges, and transit systems.	https://www.oregon.gov/odot/About/Pages/OTIB.aspx
Finance	Small City Allotment Program	The Small City Allotment (SCA) Program offers annual state funding to incorporated cities with populations of 5,000 or fewer to address transportation projects. The program allocates funding competitively within five regions, with emphasis on improving streets that are inadequate for the capacity they serve or in poor condition. This program is designed to enhance local transportation safety and infrastructure.	https://www.oregon.gov/odot/LocalGov/Pages/SCA_Program.aspx

Category	Name	Description	Webpage
Plan	Oregon Transportation Plan (OTP)	OTP sets the vision for policies which guide transportation development and financing. Current version adopted 2023. Emphasis on equity, safety, and climate friendliness in transportation planning decisions •Fair and Equitable Payment options for low to middle income residents without access to multimodal transportation • Adjust user-based pricing programs to account for longer daily-miles-traveled for rural residents	https://www.oregon.gov/odot/Planning/Pages/Plans.aspx
Plan	Oregon Highway Plan (OHP) – update in process	The Oregon Highway Plan (OHP) contains policy, performance measures, and definitions and classifications for the highway system. It is a guide for decisions of cities, counties, planners, and engineers statewide. It tells the public how investments in the system will be identified and prioritized. The new OHP will update and replace the current one that is out of date. It's had amendments but not a full update since its adoption in 1999. The new OHP will help implement the 2023 Oregon Transportation Plan (OTP) and other recent state goals, rules, and policies.	https://www.oregon.gov/odot/Planning/Pages/Oregon-Highway-Plan-Update.aspx
Policies or Regulations	Climate Friendly and Equitable Communities (CFEC)	The Climate-Friendly and Equitable Communities (CFEC) program requires cities and counties in the state's metropolitan regions with populations over 50,000 to update their comprehensive plans, zoning, and transportation system plans by reforming parking mandates, designating walkable mixed-use "Climate-Friendly Areas," and expanding housing and transportation choices, all in order to reduce greenhouse gas pollution from transportation and promote more equitable planning outcomes	https://www.oregon.gov/lcd/cl/pages/cfec.aspx
Policies or Regulations	Traffic Impact Analysis (TIA)	ODOT may require an individual applying for an approach permit (access permit) to submit a traffic impact analysis in conjunction with the application for the approach permit (ORS 374.314)	https://www.oregonlegislature.gov/bills_laws/ors/ors374.html
Policies or Regulations	OAR 660-012-0010 (Transportation System Planning vs. Project Development)	OAR 660-012-0010 defines the distinction between transportation system planning (the long-range planning process) and project development (design and construction), a key procedural boundary in Oregon's coordinated land use and transportation planning framework.	https://secure.sos.state.or.us/oard/displayDivisionRules.action?selectedDivision=3062
Policies or Regulations	OAR 660-012-0060 ('Significant Effect' Test for Plan/Zone Amendments)	OAR 660-012-0060 establishes the 'significant effect' test that local jurisdictions must apply when evaluating whether proposed comprehensive plan amendments or zone changes will significantly affect a transportation facility, triggering mitigation requirements.	https://secure.sos.state.or.us/oard/displayDivisionRules.action?selectedDivision=3062
Policies or Regulations	Transportation Planning Rule	The Transportation Planning Rule (OAR 660, Division 12) implements Statewide Planning Goal 12 (Transportation) and directs transportation planning in coordination with land use planning. It requires most cities and counties to prepare and adopt transportation system plans as part of their comprehensive plans and includes provisions (such as Section 0060) requiring jurisdictions to assess whether proposed plan amendments or zone changes will significantly affect the transportation system.	https://secure.sos.state.or.us/oard/displayDivisionRules.action?selectedDivision=3062

Category	Name	Description	Webpage
Procedures and Permitting	ODOT Development Review	ODOT develops plans for the state highway system and for an integrated, multi- modal transportation system. Local cities and counties plan for land use and economic development within their boundaries. While jurisdiction over each decision process is separate, in reality, transportation planning decisions impact the viability of land uses, and land use decisions impact the functions of the transportation system. ODOT development review provides input about the relationship of local land use decisions to the safety and operations of local highway facilities and opportunities to improve transportation systems to support both local objectives and the function of affected state facilities.	https://www.oregon.gov/odot/Planning/Documents/Development-Review-Guidelines-and-Appendices.pdf
Procedures or Permitting	Access (Driveway) Permits	Administered by ODOT's Access Management Unit, which controls how and where the department allows access to state highways from adjacent land, a state highway approach permit is the written permission that ORS 374.305(1) requires anyone to obtain before building a new approach or changing the use of an existing connection — issued through a four-step sequence of pre-application, application processing and a final approve/deny decision, approval of the approach design with a Permit to Construct, and construction inspection followed by a Permit to Operate, Maintain and Use, and unavailable altogether to a property that holds no access right to the highway.	https://www.oregon.gov/odot/Engineering/Pages/Access-Management.aspx
Procedures or Permitting	ORS Chapter 366–383 (Highways)	ORS Chapters 366–383 establish state authority over Oregon's highway system, including construction, maintenance, access management, and utility accommodation. These statutes govern how state highways interact with adjacent land development and housing projects.	https://www.oregonlegislature.gov/bills_laws/ors/ors366.html
Procedures or Permitting	OAR Chapter 731 (ODOT Rules – Access, Mobility, Development Review)	OAR Chapter 731 contains ODOT's administrative rules implementing highway access management, mobility standards, and development review requirements for projects affecting state highway facilities.	https://secure.sos.state.or.us/oard/displayChapterRules.action?selectedChapter=189
Procedures or Permitting	Utility Permits	A Utility Permit is a permit for the installation, maintenance, and operation of utility service lines on state highway right of way such as pipelines, pole lines, and buried cables for gas, water, electric and communication services. While a utility service line may be publicly or privately owned, it must provide service to the general public to be eligible for a Utility permit.	https://www.oregon.gov/odot/maintenance/pages/permits.aspx
State (Agency) Program	Transportation Growth Management Program	Transportation and Growth Management (TGM) is a joint program of DLCD and ODOT working to create thriving, livable places with diverse transportation choices. TGM programs include Code Assistance, Quick Response, Education and Outreach, TSP Assessment, and Parking Reform and Management. TGM also provides technical assistance and resources to local governments.	https://www.oregon.gov/lcd/TGM/Pages/About.aspx

Category	Name	Description	Webpage
Technical Assistance or Resources	Urban Travel Demand Model	The Oregon Department of Transportation (ODOT) provides various technical tools for transportation planning and analysis to support local and state agencies. These tools help evaluate the impacts of transportation decisions, such as changes in travel forecasts, traffic safety, or multimodal analysis. The suite includes safety analysis tools, intersection calculators, traffic volume development, and modeling tools for evaluating the operation of bikeways and pedestrian facilities. These resources are designed to assist agencies and planners in making informed decisions about infrastructure projects and policies.	https://www.oregon.gov/odot/planning/pages/technical-tools.aspx
Technical Assistance or Resources	Code Assistance (TGM)	The Code Assistance program offers local governments support in updating development regulations to promote sustainable land use and transportation. This includes designing multi-modal transportation systems, increasing walking and biking access, and improving urban growth management. Projects can be completed in one or two phases, focusing on code amendments or evaluation of current regulations.	https://www.oregon.gov/lcd/TGM/Pages/Code-Assistance.aspx
Technical Assistance or Resources	Education and Outreach (TGM)	The Education and Outreach program under the Transportation and Growth Management (TGM) initiative offers workshops, lectures, conferences, and publications to support Oregon local governments with transportation and land use planning. These resources help communities address challenges like urban design, transportation networks, housing development, and downtown revitalization, aiming to foster sustainable and livable communities.	https://www.oregon.gov/lcd/TGM/Pages/Education-Outreach.aspx
Technical Assistance or Resources	Parking Reform and Management (TGM)	The Parking Reform and Management program helps Oregon local governments address parking challenges, especially in downtown areas. It supports the development of parking management plans and the reduction or elimination of off-street parking mandates. This reform improves housing availability, supports businesses, reduces climate pollution, and enhances transportation safety. The program is typically conducted in phases with both data collection and the development of actionable plans.	https://www.oregon.gov/lcd/TGM/Pages/Parking-Reform-and-Management.aspx
Technical Assistance or Resources	Quick Response Program (TGM)	The Quick Response Program assists local governments and special districts in implementing transportation and land use plans. It supports small-scale, short-term projects that bridge long-range planning and development readiness. These projects often focus on multi-modal transportation improvements and are intended to facilitate development within three years.	https://www.oregon.gov/lcd/TGM/Pages/Quick-Response.aspx
Technical Assistance or Resources	TGM Planning Grants	The TGM Planning Grants provide funding to Oregon local governments for transportation and land use planning projects that promote sustainable, multi-modal transportation systems. These grants support the integration of land use and transportation planning to create more livable, accessible, and economically viable communities.	https://www.oregon.gov/lcd/TGM/Pages/Planning-Grants.aspx
Technical Assistance or Resources	Transportation System Plan Assessment	The Transportation System Plan (TSP) Assessment helps local governments evaluate their existing transportation system plans for potential updates. The TSP assessment reviews the current plan against Oregon's requirements and projected needs, identifying strengths, weaknesses, and areas for improvement. The assessment provides guidance for future updates and helps localities prepare for grant applications.	https://www.oregon.gov/lcd/TGM/Pages/TSP-Assessment.aspx

Category	Name	Description	Webpage
Policies or Regulations	Mobility policies and standards	Mobility policies and standards are detailed in the Oregon Highway Plan and guided by procedures detailed in the ODOT Mobility Procedures Manual. Policies for mobility include volume-to-capacity targets, Intelligent Transportation Systems, operational and capacity improvements, and transportation options. Policy 1F in the OHP details the Highway Mobility Policy	https://www.oregon.gov/odot/Planning/Documents/OHP.pdf https://www.oregon.gov/odot/projectdel/pages/mobility-planning.aspx

Oregon Health Authority – Drinking Water Services

Category	Name	Description	Webpage
Finance	Water Well Abandonment, Repair, and Replacement Fund	This fund provides grants to qualifying low- to moderate-income homeowners and tribal members to permanently abandon, repair, or replace a household water well that is dry, declining, or damaged by wildfire. The fund reimburses 100% of eligible costs up to $40,000 per grant for wells used for essential in-home purposes such as drinking, cooking, and bathing.	https://www.oregon.gov/owrd/programs/gwwl/warrf/pages/default.aspx
Finance	Safe Drinking Water Revolving Loan Fund (SDWRLF) - Design, engineering, and construction projects	The Safe Drinking Water Revolving Loan Fund (SDWRLF) offers low-cost financing to public water systems for planning, design, and construction of drinking water infrastructure improvements. The program aims to enhance the quality and accessibility of safe drinking water, particularly for communities in need.	https://www.oregon.gov/biz/programs/sdwrlf/pages/default.aspx
Finance	Sustainable Infrastructure Planning Projects (SIPP) - As part of the SDW	The Sustainable Infrastructure Planning Projects (SIPP) supports water systems with planning activities that promote sustainable infrastructure. This program offers up to $50,000 per project for activities like feasibility studies, asset management plans, water rate studies, and security risk assessments. Priority is given to systems serving fewer than 300 service connections. The funding is provided as a 100% forgivable loan and must be completed within two years.	https://www.oregon.gov/oha/ph/HealthyEnvironments/DrinkingWater/SRF/Pages/sipp.aspx
Policies or Regulations	Oregon Very Small (OVS) Drinking Water System	Effective January 1, 2022, water systems serving 4 to 14 service connections and commercial or public premises used by 10 to 24 people at least 60 days per year have been renamed Oregon Very Small (OVS) from State Regulated. New Oregon Administrative Rules 333-061-0100 retain the most important elements for public health protection and are more achievable for water suppliers with limited resources. Cursory review of OVS systems are done by DWS or County Health Departments.	https://www.oregon.gov/oha/ph/healthyenvironments/drinkingwater/rules/pages/ovss.aspx
Policies or Regulations	Community Drinking Water Systems	"Community Water System" means a public water system that has 15 or more service connections used by year-round residents, or that regularly serves 25 or more year-round residents. OAR 330- 061-0020; community water system is federally defined.	https://oregon.public.law/rules/oar_333-061-0020
Policies or Regulations	Construction Standards (for drinking water systems)	Standards for construction of new public water systems and major additions and modifications to existing public water systems.	https://www.oregon.gov/oha/PH/HEALTHYENVIRONMENTS/DRINKINGWATER/PLANREVIEW/Documents/OAR-333-061-0050.pdf

Category	Name	Description	Webpage
Policies or Regulations	Waiver from Construction Standards (for drinking water systems)	Drinking Water Services may grant waivers from construction standards for drinking water systems under some conditions.	https://www.oregon.gov/oha/PH/HEALTHYENVIRONMENTS/DRINKINGWATER/PLANREVIEW/Documents/OAR-333-061-0050.pdf
Policies or Regulations	Drinking Water Quality Act (ORS 448.115–448.285)	The Drinking Water Quality Act (ORS 448.115–448.285) regulates public drinking water systems in Oregon, setting safety standards and oversight authority for the Oregon Health Authority. Compliance with this act is required for new public water systems serving new development.	https://www.oregonlegislature.gov/bills_laws/ors/ors448.html
Policies or Regulations	Drinking Water Rules (OAR Chapter 333, Division 61)	OAR Chapter 333, Division 61 contains comprehensive regulations for public water systems in Oregon, covering water quality standards, system design, operation, and reporting requirements administered by the Oregon Health Authority.	https://www.oregon.gov/oha/ph/healthyenvironments/drinkingwater/rules/pages/index.aspx
Procedures or Permitting	Domestic Well Testing Act and Real Estate Transaction (RET)	The Domestic Well Testing Act (ORS 448.271) applies to the sale or exchange of real estate with a domestic well. A domestic well is used for purposes like drinking, cooking, washing, or bathing. During the real estate transaction (RET), the seller must test the well's water quality and share the results and the RET form to comply with the Domestic Well Testing Act. Properties with spring wells, irrigation only wells, or well located on undeveloped land are exempt from these rules.	https://www.oregon.gov/oha/PH/HEALTHYENVIRONMENTS/DRINKINGWATER/SOURCEWATER/DOMESTICWELLSAFETY/Pages/Testing-Regulations.aspx
Procedures or Permitting	Plan Review (water system, infrastructure)	Plan review approval through Drinking Water Services (DWS) is required before construction begins on major additions or major modifications of water systems. Major additions may include, but are not limited to, new wells, reservoirs, water lines, continuous chlorination, pump stations, and chemical treatment. Includes a LUCS step as part of materials for plan review. LUCS is completed by applicant in consultation with local planning authority.	https://www.oregon.gov/oha/ph/healthyenvironments/drinkingwater/planreview/pages/index.aspx
State (Agency) Program	Drinking Water Services	Oregon Drinking Water Services (DWS) administers and enforces drinking water quality standards for public water systems in the state of Oregon. DWS focuses resources in the areas of highest public health benefit and promotes voluntary compliance with state and federal drinking water standards. DWS also emphasizes prevention of contamination through source water protection, provides technical assistance to water systems and provides water system operator training.	https://www.oregon.gov/oha/ph/healthyenvironments/drinkingwater/pages/index.aspx
State (Agency) Program	Drinking Water Protection Program	The Drinking Water Protection Program, administered by the Oregon Department of Environmental Quality (DEQ), aims to safeguard the state's public drinking water sources from contamination. This initiative works in collaboration with the Oregon Health Authority and focuses on over 2,500 public water systems across Oregon. The program provides technical assistance, resources, and guidance to communities and water suppliers to implement effective source water protection measures.	https://www.oregon.gov/deq/wq/dwp/Pages/default.aspx
Technical Assistance or Resources	Cross Connection and Backflow Prevention Program	Assists water suppliers and users to protect from backflow hazards. Provides technical assistance, training, and online resources.	https://www.oregon.gov/oha/PH/HEALTHYENVIRONMENTS/DRINKINGWATER/CROSSCONNECTION/Pages/index.aspx

Category	Name	Description	Webpage
Technical Assistance or Resources	Oregon's Domestic Well Safety Program (DWSP)	Protects groundwater for the 23% of Oregonians which use domestic/private wells for their primary potable water source, partners with local health and state agency departments, and offers well testing services for owners and during real estate transactions; water well abandonment, repair, and replacement fund	https://www.oregon.gov/oha/PH/HealthyEnvironments/DrinkingWater/SourceWater/DomesticWellSafety/Pages/index.aspx
Technical Assistance or Resources	Circuit Riders Technical Assistance	The Circuit Rider Program provides technical and engineering assistance to community water systems serving populations under 10,000, and nonprofit transient and non-transient water systems. Through the Drinking Water State Revolving Fund (DWSRF), the program offers short-term assistance, typically under 10 hours, at no cost. Additional state funds support assistance to non-eligible systems, except federally owned ones.	https://www.oregon.gov/oha/ph/healthyenvironments/drinkingwater/operations/pages/circuitrider.aspx

Oregon Housing and Community Services

Category	Name	Description	Webpage
Finance	CDBG-DR: Affordable Housing Development (AHD)	The AHD program supports affordable housing recovery in areas impacted by the 2020 wildfires and straight-line winds. Managed by Oregon Housing and Community Services (OHCS), it funds county governments or designated entities to develop affordable rental and homeownership opportunities. It includes new construction, rehabilitation, and infrastructure improvements in disaster-affected counties. The program ensures long-term housing options for low- and moderate-income (LMI) households.	https://www.oregon.gov/ohcs/disaster-recovery/reoregon/community-support-services/Pages/affordable-housing-development.aspx
Finance	CDBG-DR: Planning, Infrastructure and Economic Revitalization (PIER)	The PIER Program provides funding to communities affected by the 2020 Labor Day Disasters to support recovery and future resilience. It focuses on rebuilding infrastructure, revitalizing the economy, and planning for sustainable growth. The program uses CDBG-DR funds from HUD.	https://www.oregon.gov/ohcs/disaster-recovery/reoregon/community-support-services/Pages/about-pier.aspx
Finance	Oregon Multifamily Energy Program (OR-MEP)	The Oregon Multifamily Energy Program (OR-MEP) offers incentives for energy efficiency upgrades in multifamily rental properties. To participate, properties must have at least 5 residential units and meet specific eligibility criteria, such as being heated by electric systems and serving low-income residents. The program encourages energy-efficient renovations to reduce utility costs and improve sustainability in multifamily housing. Participants can apply during designated enrollment periods and receive support throughout the process.	https://oregonmultifamilyenergy.com/learn-how-to-participate/
Finance	Section 811 (PSH)	Federal funding available to developers for construction or rehabilitation specifically to create supportive housing for persons with disabilities.	https://www.oregon.gov/ohcs/compliance-monitoring/pages/program-hud-811-project-rental-assistance.aspx

Category	Name	Description	Webpage
Finance	501C3 Conduit Bonds	The 501(c)(3) Conduit Revenue Bonds program offers tax-exempt bonds to qualified nonprofit organizations (501(c)(3) entities) for affordable housing projects. These bonds help lower the cost of funds by providing tax-exempt interest, making it easier for organizations to finance projects, especially those targeting low-income individuals or families. The program can be used for a range of projects, including affordable housing, preservation, acquisition, market-to-affordable conversions, and mixed-income developments. Eligible projects must primarily serve people earning at or below 120% of the Area Median Income (AMI).	https://www.oregon.gov/ohcs/rental-housing/housing-development/development-resources/Pages/501c3-conduit-revenue-bonds-.aspx
Finance	Risk Share Program	The Risk Share Program supports the development and preservation of affordable rental housing in Oregon by offering low-interest, long-term loans to housing developers. Administered by OHCS in partnership with the U.S. Department of Housing and Urban Development (HUD), the program helps reduce financing costs for projects that serve low-income Oregonians. In return, property owners agree to keep rents affordable and meet ongoing requirements that promote housing access and community well-being.	https://www.oregon.gov/ohcs/compliance-monitoring/pages/risk-share-program-compliance.aspx
Finance	Agricultural Workforce Housing Tax Credit	The Agriculture Workforce Housing Tax Credit (AWHTC) program provides state income tax credits to investors who incur costs for constructing, acquiring, installing, or rehabilitating housing for agricultural workers. The program offers a tax credit equal to 50% of eligible costs incurred for farmworker housing projects. The credits can be transferred to contributors and are designed to improve housing options for farmworkers, addressing overcrowded and inadequate conditions.	https://www.oregon.gov/ohcs/development/Pages/agriculture-workforce-housing.aspx
Finance	Construction Loan Guarantee	The Construction Loan Guarantee (CLG) program, managed by Network for Oregon Affordable Housing (NOAH) with funding from Oregon Housing and Community Services (OHCS), provides loan guarantees for affordable housing development projects targeting low- to moderate-income households. The program helps mitigate risks for lenders, making it easier for developers to secure construction financing. It prioritizes projects serving rural areas, small organizations, and culturally specific communities. The guarantees are offered for up to five years, supporting the development of projects that may otherwise face challenges due to economic factors. The program is designed to address housing needs while promoting equitable access to financing.	https://www.oregon.gov/ohcs/rental-housing/housing-development/development-resources/Pages/construction-loan-guarantee.aspx
Finance	General Housing Account Program	The General Housing Account Program (GHAP) aims to expand Oregon's housing supply for low and very low-income individuals, with a special focus on veterans. The program is one of the most flexible funding sources administered by OHCS, providing either grants or low-interest loans for rental housing development projects. GHAP funds can be used statewide, including on Tribal lands.	https://www.oregon.gov/ohcs/rental-housing/housing-development/development-resources/Pages/general-housing-account-program-ghap-veterans.aspx
Finance	General Housing Account Program - Capacity Building	The General Housing Account Program (GHAP) Capacity Building Program provides grants, training, and technical assistance to help build capacity in organizations and communities working on affordable rental housing. The goal is to increase affordable rental housing production, preservation, and sustainability, particularly in areas with high unmet housing needs.	https://www.oregon.gov/ohcs/rental-housing/housing-development/development-resources/pages/general-housing-account-capacity-building.aspx

Category	Name	Description	Webpage
Finance	General Housing Account Program - Veteran's	The GHAP provides funding to expand Oregon's housing supply for low and very low-income families, with a set-aside for veteran housing. It offers both rental housing development and housing for veterans. Funding is flexible, available as either grants or low-interest loans. 25% of the funds are specifically allocated for veteran housing. The program aims to serve households earning at or below 80% of the Area Median Income (AMI) and imposes a 60-year affordability requirement.	https://www.oregon.gov/ohcs/rental-housing/housing-development/development-resources/Pages/general-housing-account-program-ghap-veterans.aspx
Finance	Home Investment Partnerships Program	The Home Investment Partnerships Program (HOME) provides funding for the development of affordable housing for low-income households. It supports activities such as new construction, rehabilitation, and rental assistance, prioritizing households with incomes at or below 50% of the median family income (MFI). HOME funds are allocated by Oregon Housing and Community Services (OHCS) to rural communities without direct HUD allocations. Projects must ensure long-term affordability, with a 60-year affordability requirement.	https://www.oregon.gov/ohcs/rental-housing/housing-development/development-resources/pages/home-homearp-housing-trust-fund.aspx
Finance	Homeownership Development Incubator Program (HDIP)	The Homeownership Development Incubator Program (HDIP) aims to increase affordable homeownership opportunities for low- to moderate-income families up to 120% AMI. Established in 2022, the program provides funding to developers for constructing new homes or converting existing structures for purchase. HDIP focuses on supporting both urban and rural communities, with an emphasis on increasing housing density and addressing the needs of first-generation homebuyers, communities of color, tribal nations, and individuals with disabilities. HDIP also encourages the development of energy-efficient, climate-resilient housing, while building capacity for emerging developers. The program's goal is to create more affordable and sustainable homeownership options in Oregon. HDIP aims to support Oregon's housing developers through capacity-building grants, pre-development funding, and the direct allocation of funds to projects not eligible for other homeownership development funding sources, including homeownership development on Tribal lands and other Tribal homeownership development programs	https://www.oregon.gov/ohcs/homeownership/pages/hdip.aspx
Finance	Housing Development Grant Program (HGDP)	The Housing Development Grant Program (HDGP) "Trust Fund" was created to expand Oregon's housing supply for low- and very low-income families and individuals. HDGP is designed to provide grants to construct new housing, acquire and/or rehabilitate existing structures, or operate housing for low-income households living in multifamily rental housing.	https://www.oregon.gov/ohcs/rental-housing/housing-development/development-resources/pages/housing-development-grant-program.aspx
Finance	Land Acquisition Revolving Loan Program	The Land Acquisition Revolving Loan Program (LAP) helps eligible organizations in Oregon purchase land for affordable housing development. It supports both rental and homeownership projects for low-income individuals and families. The program aims to facilitate affordable housing by offering low-interest loans, with funds targeted for homeownership (40%) and rental housing (60%).	https://www.oregon.gov/ohcs/development/Pages/land-acquisition-revolving-loan.aspx

Category	Name	Description	Webpage
Finance	Local Innovation and Fast Track (LIFT) - Homeownership	The Local Innovation and Fast Track (LIFT) Homeownership Program focuses on creating affordable homeownership opportunities for low- to moderate-income families in Oregon. With a focus on increasing housing supply, LIFT funds are used for new construction of homes, or conversion of non-housing structures, that will be ready for sale within 36 months of receiving a funding reservation. Utilizing Article XI-Q bonds as funding, LIFT Homeownership supports shared equity projects such as community land trusts, leasehold condos, co-ops, and limited equity co-ops to provide permanently affordable homes across Oregon.	https://www.oregon.gov/ohcs/homeownership/pages/lift.aspx
Finance	Local Innovation and Fast Track (LIFT) - Rental	The Local Innovation and Fast Track (LIFT) Rental Program is designed to expand Oregon's supply of affordable rental housing for low-income families. The program funds the construction, conversion, or acquisition of affordable housing units that serve households earning at or below 60% of the County Area Median Income (AMI). It is targeted towards creating new affordable units, with a focus on historically underserved communities, including rural areas and communities of color.	https://www.oregon.gov/ohcs/rental-housing/housing-development/development-resources/Pages/local-innovation-fast-track-rental.aspx
Finance	Low-Income Housing Tax Credit (LIHTC)	The Low-Income Housing Tax Credit (LIHTC) program provides federal tax credits to developers for constructing, acquiring, or rehabilitating affordable rental housing. It supports both multifamily and single-family units, with a focus on maintaining affordability for low-income tenants. Eligible applicants include for-profit, nonprofit developers, and housing authorities. The program has two types of credits: 9% (competitive) and 4% (available with private activity bonds). Projects must meet specific rent and income restrictions to ensure affordability.	https://www.oregon.gov/ohcs/rental-housing/housing-development/development-resources/Pages/low-income-housing-tax-credits.aspx
Finance	Manufactured Home Replacement Program	Incentivizes manufactured homeowners to replace old and energy-inefficient homes with the help of a manufactured home replacement navigator. Provides assistance with the disposal of a current owner-occupied manufactured home, the purchase of a new energy-efficient manufactured home, and the additional work required to make a new manufactured home move-in ready.	https://www.oregon.gov/ohcs/mmcrc/Pages/MHRP.aspx
Finance	Moderate Income Revolving Loan Fund (MIRL)	The Moderate-Income Revolving Loan (MIRL) program was established by Senate Bill 1537 in the 2024 Legislative Session, allocating $75 million in General Fund resources for the Housing Project Revolving Loan Fund. The program intends to support and expand very low-, low- and moderate-income housing production in local communities across the state through a revolving loan structure.	https://www.oregon.gov/ohcs/rental-housing/housing-development/development-resources/pages/moderate-income-revolving-loan.aspx
Finance	Modular Housing Development Fund	The Modular Housing Development Fund (MHDF) is designed to accelerate the production of modular housing in Oregon. With a focus on increasing manufacturing capacity, the fund aims to support the creation of affordable, disaster-resilient housing. The program is particularly focused on addressing housing needs for low- to middle-income residents and aiding wildfire recovery efforts. By expanding modular housing production in both urban and rural areas, the MHDF seeks to address the state's housing shortage and improve availability in communities impacted by disasters. The program prioritizes sustainable, cost-effective housing solutions that can be rapidly deployed to meet urgent needs.	https://www.oregon.gov/ohcs/development/Pages/modular-housing-development-fund.aspx

Category	Name	Description	Webpage
Finance	National Housing Trust Fund	The Housing Trust Fund (HTF) program provides federal funding to develop affordable housing for extremely low-income (ELI) and very low-income households. The program supports the creation and preservation of rental units that are affordable for households earning at or below 30% of the median family income (MFI). The HTF prioritizes projects that create affordable housing for people experiencing homelessness and those at risk of homelessness.	https://www.oregon.gov/ohcs/rental-housing/housing-development/development-resources/pages/home-homearp-housing-trust-fund.aspx
Finance	Oregon Affordable Housing Tax Credit (OAHTC)	The Oregon Affordable Housing Tax Credit (OAHTC) is a state income tax credit designed to lower rents for low-income renters in affordable housing projects. It allows banks to reduce interest rates on loans for affordable housing by 4%, with the difference claimed as a tax credit. The savings from lower interest rates are passed on to tenants in the form of rent reductions. The program primarily benefits households earning less than 50% of the area median income (AMI), and often less than 30% of AMI. To participate, property owners must agree to pass 100% of the interest savings to tenants and comply with long-term affordability requirements. The program supports both for-profit and nonprofit developers, local governments, and housing authorities.	https://www.oregon.gov/ohcs/development/Pages/oregon-affordable-housing-tax-credit.aspx
Finance	Permanent Loan Guarantee	The Permanent Loan Guarantee Program helps affordable housing developers secure financing by guaranteeing a portion of loans for projects aimed at low- to very low-income housing. This reduces lender risk and encourages more favorable loan terms for developers, especially in underserved areas. Eligible organizations include local governments, Federally recognized Tribal Governments, nonprofits, and for-profit businesses, while eligible lenders are state and federally regulated banks, credit unions, and other financial entities. The guarantee can be used during the transition from construction to permanent loans. In case of loan default, the program covers losses up to the guaranteed amount. Applicants must meet specific financial criteria and demonstrate sound development experience. Applications are accepted on a rolling basis with a $500 fee.	https://www.oregon.gov/ohcs/rental-housing/housing-development/development-resources/Pages/permanent-loan-guarantee.aspx
Finance	Permanent Supportive Housing	The Permanent Supportive Housing (PSH) Program provides funding for the development of housing projects aimed at individuals experiencing chronic homelessness. The program includes funding for capital development, project-based rental assistance, and supportive services to ensure long-term affordability and comprehensive services for residents. PSH units must provide on-site support services and serve households at or below 60% of the County Area Median Income (AMI). To be eligible for Permanent Supportive Housing funds, Sponsor's must complete the Oregon Supportive Housing Institute within the last four years or have a recent program monitoring score of 150 or above.	https://www.oregon.gov/ohcs/development/pages/permanent-supportive-housing.aspx
Finance	Predevelopment Funding	The Predevelopment Funding program supports nonprofit, rural, and culturally specific developers by providing loans to cover early-stage costs of affordable housing projects. This helps organizations assess feasibility and prepare projects for full development. It includes two types of loans: the Project Feasibility Loan (PFLP) up to $50,000 and Predevelopment Loan Program (PDLP) up to $750,000. Both loans assist in activities like environmental testing, costs of survey, permits, and other predevelopment costs. PFLP is for smaller organizations, while PDLP is for nonprofit organizations, housing authorities, and tribal nations. There is also a grant option available for agricultural workforce housing projects.	https://www.oregon.gov/ohcs/rental-housing/housing-development/development-resources/Pages/predevelopment-funding.aspx

Category	Name	Description	Webpage
Plan	Oregon Statewide Housing Plan (SWHP)	The SWHP identifies areas of need to build support and coordinate response to Oregon's housing challenges. It is characterized by its focus on data and research and spans 5 years. The plan focused on targeting and serving racial and equitable justice, rural communities, affordable housing, homeownership, permanent supportive housing, and homelessness. The plan is no longer active as it began in 2019 and completed in 2025. The plan was impacted by COVID-19 and therefore adjusted some goals to be more feasible but was overall successful in achieving or exceeding its measurable goals of increasing housing opportunities. A key achievement was assisting in the establishment of the OHNA.	https://www.oregon.gov/ohcs/Pages/oregon-state-wide-housing-plan.aspx
Plan	ReOregon Action Plan	The ReOregon Action Plan was established following the 2020 wildfires which destroyed more than 4,300 homes and burned 1.2 million acres of land. The plan assisted with disaster recovery, including improvements to affordable housing, economic revitalization, and infrastructure redevelopment concerns. $422 million in funding was allocated to Oregon through HUD's Community Block Development Grant Disaster Recovery Funds, over a quarter of which were dedicated to Affordable Housing Development.	https://www.oregon.gov/ohcs/disaster-recovery/reoregon/about-reoregon/Pages/plans-policies-reports.aspx
Policies or Regulations	Oregon Housing Needs Analysis	The Oregon Housing Needs Analysis (OHNA) is the first substantial update to Statewide Planning Goal 10: Housing since its establishment over 50 years ago. The OHNA framework establishes a coordinated statewide approach to housing planning that focuses on equitable outcomes and fair housing principles, a data-driven methodology for estimating housing need, and more state support.	https://www.oregon.gov/lcd/housing/Pages/ohna.aspx
Policies or Regulations	Private Activity Bond Test for 4% LIHTC (H.R.1 / 2025 Federal Law)	Congress passed H.R.1 in July 2025, lowering the 50% financed-by test (for qualifying for 4% LIHTC with private activity bonds) to 25% of aggregate basis for transactions with bond issuances on or after January 1, 2026, or for 2025 bond issuances where at least 5% of aggregate basis is issued in 2026.	https://www.oregon.gov/ohcs/rental-housing/housing-development/development-resources/pages/private-activity-bond-test-4-percent-lihtc-updated-policy.aspx
Policies or Regulations	Oregon Housing and Community Services (ORS 456)	ORS 456 is the primary statutory authority for Oregon Housing and Community Services (OHCS), establishing the agency's powers, duties, and authority to administer housing finance programs, grants, loans, and tax credit allocations.	https://www.oregonlegislature.gov/bills_laws/ors/ors456.html
Policies or Regulations	Oregon Affordable Housing Tax Credit (OAHTC) Statute (ORS 456.690–456.745)	ORS 456.690–456.745 establishes the statutory authority for the Oregon Affordable Housing Tax Credit (OAHTC), which provides a state income tax credit to banks that reduce interest rates on loans for affordable housing, passing the savings to low-income tenants.	https://www.oregon.gov/ohcs/development/Pages/oregon-affordable-housing-tax-credit.aspx
Procedures or Permitting	Oregon Centralized Application (ORCA)	The Oregon Centralized Application (ORCA) is one of the primary ways the state advances housing progress. Through the ORCA, investments that boost housing supply are reviewed against standards that ensure projects are designed and built in ways that help make life more affordable, strengthen local economies, and are responsive to housing needs. This centralized process is an always-open system that accepts applications on a rolling basis. Applications are reviewed against standards, including cost controls, readiness, and policy goals.	https://www.oregon.gov/ohcs/rental-housing/housing-development/oregon-centralized-application-orca/pages/get-help-orca.aspx

Category	Name	Description	Webpage
Procedures or Permitting	Guidance and Documentation (HOD)	The Homeownership Division publishes program manuals, guidance documents, application materials, and related documentation for its homeownership programs (such as LIFT Homeownership and HDIP), setting out eligibility rules, requirements, and procedures for developers, lenders, and partner organizations.	https://www.oregon.gov/ohcs/homeownership/pages/homeownership-development.aspx
State (Agency) Program	Disaster Recovery and Resilience Division	Created in response to the 2020 Labor Day wildfires. Staff and operations are funded by a one-time CDBG-DR allocation from Congress expiring in 2029. Supports communities recovering from the 2020 Wildfires. Administers and implements the long-term recovery programs established under the ReOregon Action Plan and specific to 2020 Wildfire recovery.	https://www.oregon.gov/ohcs/disaster-recovery/Pages/DRR-Home.aspx
State (Agency) Program	Housing Stability Council	The Housing Stability Council members are appointed by the Governor, subject to confirmation by the Senate. The Council, with the advice of the Director of Oregon Housing and Community Services, sets policy, approves or disapproves rules and standards for programs, and approves or disapproves loans and grants.	https://www.oregon.gov/ohcs/hsc/pages/index.aspx
State (Agency) Program	Affordable Rental Housing Division (ARH)	Oversees LIHTC, LIFT, PSH, agricultural workforce housing, Oregon Housing Acquisition Program, GHAP capacity building, Housing Development Grant Program, HOME, Land Acquisition Revolving Loan, Construction Loan Guarantee, Permanent Supportive Housing, Oregon Affordable Housing Tax Credit, Pass-through Bond Financing, 501c3 Bond Program, Housing Preservation, Oregon Housing Bond Fund Housing Development Fund, PSH Sales Tax Exemption.	https://www.oregon.gov/ohcs/Pages/agency-programs.aspx
State (Agency) Program	Homeownership Division (HOD)	Oversees Flex Lending, DPA, Homeownership Centers, LIFT, HDIP, LAP, OAHTC, and Manufactured Dwelling Park Preservation.	https://www.oregon.gov/ohcs/about-us/Pages/agency-divisions.aspx
Technical Assistance and Resources	Technical Assistance (HOD)	The Homeownership Division provides technical assistance to developers, homeownership centers, lenders, and community-based organizations participating in its programs, including guidance on navigating funding processes, program requirements, and the development of affordable homeownership opportunities.	https://www.oregon.gov/ohcs/homeownership/pages/homeownership-development.aspx
Technical Assistance or Resources	Technical Assistance (ARH)	Technical Advisors are specialized OHCS staff assigned to guide development partners through the ORCA system and other Affordable Rental Housing development strategies.	https://www.oregon.gov/ohcs/rental-housing/housing-development/oregon-centralized-application-orca/pages/get-help-orca.aspx

Oregon Parks and Recreation Department – State Historic Preservation Office

Category	Name	Description	Webpage
Finance	Diamonds in the Rough Grant	For restoring or reconstructing the facades of buildings that have been heavily altered over the years. The purpose is to return them to their historic appearances and potentially qualify them for historic designation	https://www.oregon.gov/oprd/oh/pages/grants.aspx
Finance	Preserving Oregon Grant	Offers matching grants for rehabilitation work that supports the preservation of historic resources listed in the National Register of Historic Places or for significant work contributing toward identifying, preserving and/or interpreting archaeological sites	Oregon Parks and Recreation : Grants : Oregon Heritage : State of Oregon

Category	Name	Description	Webpage
Finance	Oregon Main Street Revitalization Grant	The Oregon Main Revitalization Street Grant supports downtown revitalization efforts in communities participating in the Oregon Main Street Network. The purpose of the program is to: 1.) Acquire, rehabilitate, and construct buildings on properties in designated downtown areas statewide; and 2.) Facilitate community revitalization that will lead to private investment, job creation or retention, establishing or expanding viable businesses, or creating a stronger tax base.	https://www.oregon.gov/oprd/OH/Documents/2025ORMainStreetRevitalizationGrantInformation.pdf
Finance	Oregon Special Assessment Property Tax Program (State Tax Credit)	The State Tax Incentive is the Oregon Special Assessment Property Tax Program for Commercial Historic Properties. Oregon was the first in the nation to offer a preservation tax incentive for historic properties in 1975, and it has undergone numerous changes over the years. The Special Assessment program is a 10-year benefit for National Register-listed commercial properties, offering a property tax break in exchange for qualifying work being completed and meeting a spending threshold during the benefit period.	https://www.oregon.gov/oprd/oh/pages/tax-incentives.aspx
Finance	Historic Rehabilitation tax credit (federal)	The federal Historic Rehabilitation Tax Credit provides a 20% income tax credit for the certified rehabilitation of income-producing buildings listed in the National Register of Historic Places. The work must meet the Secretary of the Interior's Standards for Rehabilitation and is reviewed by the SHPO and certified by the National Park Service; the credit is not available for private, owner-occupied residences.	https://www.oregon.gov/oprd/oh/pages/tax-incentives.aspx
Finance	Special Assessment for Historic Properties	A tax incentive for commercial properties (current law is commercial only but there are some grandfathered in residential properties that will have a special assessment until about 2034)	https://www.oregon.gov/oprd/oh/pages/tax-incentives.aspx
Plan	2026 – 2033 Oregon Heritage Plan	The Oregon Heritage Plan is a call to action for heritage efforts across the state to unite around common goals. The Heritage Commission invites individuals and organizations to discuss the goals and strategies in this Plan, consider how they align with organization missions and priorities, and join the Commission in this work.	https://www.oregon.gov/oprd/OH/pages/tools.aspx#2026heritageplan
Plan	2024- 2033 Oregon Historic Preservation Plan	This plan guides work statewide for the next ten years and aims to unite the heritage community in crafting a collective narrative across our special traditions, collections, and places that reflect the history and culture of all Oregonians.	https://www.oregon.gov/oprd/OH/Documents/2024_OR_PreservationPlan_%20English_web.pdf
Policies or Regulations	Archaeological Permitting	An Oregon Archaeological Permit is needed to excavate or collect from an archaeological site on non-federal public or private lands. A permit is also needed to probe for an archaeological site on non-federal public lands. A permit is not required for pedestrian survey if no materials will be collected.	https://www.oregon.gov/oprd/OH/Pages/archaeology.aspx
Policies or Regulations	Archaeological Reporting	SHPO records and maintains archaeological reporting done by qualified archaeologists. These records are recorded in an archaeology bibliographic database and spatially linked in the OARRA. Reports include pedestrian survey reports (typically document results of Section 106 NHPA Area of Potential Effect (APE) inventories, etc.) and monitoring reports (ex. construction monitoring) amongst others.	https://www.oregon.gov/oprd/OH/Documents/Reporting_Guidelines.pdf

Category	Name	Description	Webpage
Policies or Regulations	ORS 358.653 SHPO Consultation	Administrative process reviewing for compliance with state cultural resource protection laws. State and local agencies - for project scopes that involve ground disturbance on non-federal public land or involve work on non-federal publicly owned buildings or structures. Any state agency or political subdivision that owns a historic property consults with the State Historic Preservation Officer to conserve the property and assure it will not be inadvertently transferred, sold, demolished, substantially altered or allowed to deteriorate.	https://www.oregon.gov/oprd/OH/Pages/ProjectReview.aspx
Policies or Regulations	National Historic Preservation Act (NHPA) Section 106	Section 106 of the National Historic Preservation Act (54 U.S.C. 306108) requires federal agencies and federally funded or permitted projects to consider effects on historic properties and consult with SHPO before approving undertakings. This review applies to housing projects receiving federal funding.	https://www.oregon.gov/oprd/OH/Pages/ProjectReview.aspx
Procedures or Permitting	Secretary of the Interior's Standards	The Secretary of the Interior's Standards provides guidance for the treatment (preservation, rehabilitation, restoration, or reconstruction) of historic properties. All SHPO programs apply these standards, including Federal Historic Tax Credit projects and Section 106 review.	https://www.nps.gov/subjects/historicpreservation/standards-and-guidelines.htm
Procedures or Permitting	Programmatic Agreements (Federal)	Programmatic agreements are the most commonly used National Historic Preservation Act (NHPA) Section 106 program alternative. They allow federal agencies to manage a specific program or address an adverse effect through a negotiated agreement with the appropriate SHPO or Tribal Historic Preservation Office and the Advisory Council on Historic Preservation. A programmatic agreement can also establish alternative review processes for recurring activities and reduce the need for project-by-project review in certain programs.	https://www.achp.gov/program_alternatives/pa
State (Agency) Program	Certified Local Government Program	This is a federal program, administered to Oregon by OPRD and SHPO, which promotes historic preservation at the local level. Becoming certified allows local governments to increase opportunities and effectiveness for historic preservation, enjoy partnerships with SHPO and National Park Service, receive special training and workshops, and apply for grants between $5,000 and $20,000. The certification process is lengthy.	https://www.oregon.gov/oprd/oh/pages/clg.aspx
State (Agency) Program	National Register of Historic Places	The National Register of Historic Places is a federal program which is administered in Oregon by OPRD and SHPO. The benefits of the program include tax incentives, grant eligibility, building code leniency, promoting or leveraging the value of heritage in your community, and consideration in planning for federal projects. However, Oregon law requires properties on this list to be subject to local governmental review before demolishing or relocating.	https://www.oregon.gov/oprd/oh/pages/national-register.aspx
State (Agency) Program	Oregon Main Street Program	This program helps revitalize historic or older commercial downtown centers and districts. The Oregon Main Street Revitalization Grant is the funding source for building projects under this program, and it also provides technical assistance to communities that want to draw a plan for revitalization. The goal of revitalizing the downtown areas is to spur economic activity in the area. It allows partnership between OPRD and local organizations, governments, and communities to rebuild downtown districts to align with the goals of that group, distributing state resources for more concentrated efforts. Applicants are usually nonprofit organizations which have a focus in downtown revitalization and is sometimes a local government. At least 50% of funds must go to rural communities.	https://www.oregon.gov/oprd/oh/pages/oms.aspx

Category	Name	Description	Webpage
Technical Assistance and Resources	Oregon Archaeological Records Remote Access (OARRA)	The Oregon SHPO hosts and administers the Oregon Archaeological Records Remote Access (OARRA). A GIS based web portal with information on documented archaeological resources and archaeological survey reports. OARRA is available only to professional archaeologists and researchers who meet criteria.	https://www.oregon.gov/oprd/oh/pages/database-and-mapping-resources.aspx
Technical Assistance and Resources	Oregon Historic Sites Database	Role of SHPO to maintain an inventory of historic properties and known recorded archaeological sites; Same record that reflects inventories from agencies utilizing federal funds and subject to Section 106 review; includes a range of other records from cities, counties, state agencies, public members; has a role/function in national designation of historic properties or sites, archaeological records not public	https://www.oregon.gov/oprd/oh/pages/database-and-mapping-resources.aspx
Technical Assistance or Resources	Certified Local Government Grant (SHPO)	The Certified Local Government (CLG) Grant program provides competitive grants of $5,000–$20,000 to local governments that have achieved CLG certification through SHPO. Grants support local historic preservation activities including survey, planning, and public education.	https://www.oregon.gov/oprd/oh/pages/clg.aspx

Regional Solutions

Category	Name	Description	Webpage
Finance	Regional Infrastructure Fund	The 2013 Oregon Legislature created the Regional Infrastructure Fund to provide grants and loans to local governments for Regional Solutions implementation projects including long-range planning, research, and design. Business Oregon administers the lottery-funded Regional Infrastructure Fund and established the Grant & Loan Review Committee who makes the final determination of project and award amounts. The committee is comprised of a geographically diverse, odd number of members from the Business Oregon Commission and the IFA Board. At least one member must be a representative from a city and one from a county.	https://www.oregon.gov/biz/aboutus/boards/regional_infrastructure_fund/pages/default.aspx
State (Agency) Program	Regional Solutions	Regional Solutions is a community and economic development program that brings together the public, private and civic sectors to advance projects, solve problems, seize opportunities, and respond to emerging local needs.	https://www.oregon.gov/gov/regional-solutions/pages/default.aspx

Federal or State Statutory Framework for Local Governments

Category	Name	Description	Webpage
Policies or Regulations	National Environmental Policy Act (NEPA)	The National Environmental Policy Act (NEPA) requires federal agencies to assess the environmental effects of proposed actions before making decisions. NEPA review applies to housing and infrastructure projects involving federal permits, funding, or approvals.	https://www.energy.gov/nepa/national-environmental-policy-act
Policies or Regulations	Sewer Moratoriums (ORS 197.250)	ORS 197.250 governs when a city can declare sewer moratoriums, restricting new connections to a wastewater system. Moratoriums can significantly limit housing development capacity in affected areas.	https://www.oregonlegislature.gov/bills_laws/ors/ors197.html

Category	Name	Description	Webpage
Policies or Regulations	System Development Charges (SDCs)	System Development Charges (SDCs), authorized under ORS 223.297–223.314, are fees imposed by local governments on new development to fund capital improvements to public infrastructure systems (water, sewer, transportation, parks). SDC levels significantly affect housing development feasibility.	https://www.oregonlegislature.gov/bills_laws/ors/ors223.html
Policies or Regulations	Local Improvement Districts (LIDs) / Development Agreements	Local Improvement Districts (ORS 223.387+) allow local governments to finance public infrastructure improvements by assessing benefiting properties. Development agreements can also be used to allocate infrastructure costs between developers and local governments.	https://www.oregonlegislature.gov/bills_laws/ors/ors223.html
Policies or Regulations	Local Historic Review / Historic Districts	Local governments may establish historic districts and historic review processes under Goal 5 and ORS 197A.400 (clear and objective standards exemptions). These voluntary local programs affect the permitting timeline and design requirements for housing development in or near historic resources.	https://www.oregon.gov/oprd/oh/pages/clg.aspx
Policies or Regulations	Local Permit Review and Inspection Systems	Oregon cities and counties operate local building permit systems. The efficiency of local permit review and inspection systems directly affects housing production timelines and costs.	https://www.oregon.gov/bcd/jurisdictions/pages/index.aspx
Policies or Regulations	HUD Environmental Review (ER) for Federally Funded Housing	Projects receiving HUD funding (including CDBG, HOME, CDBG-DR, and other federal housing grants) must complete a HUD Environmental Review under 24 CFR Part 58 or Part 50 before funds can be committed or drawn. The review assesses site suitability, environmental hazards, and compliance with federal environmental laws.	https://www.hud.gov/program_offices/comm_planning/environment
Policies or Regulations	Urban Renewal / Tax Increment Financing (TIF)	Urban renewal agencies, authorized under ORS 457, use tax increment financing (TIF) to fund infrastructure improvements in designated urban renewal areas. TIF captures increases in property tax revenues generated by new development to repay bonds issued for public improvements and can be used to support housing production.	https://www.oregonlegislature.gov/bills_laws/ors/ors457.html
Procedures or Permitting	Land Use Board of Appeals (LUBA)	The Land Use Board of Appeals (LUBA), established under ORS 197.805–197.855, is Oregon's specialized court for reviewing local land use decisions. LUBA decisions affect the speed and outcome of land use approvals for housing and development projects.	https://www.oregon.gov/luba/pages/index.aspx

Part D: Engagement Process Methods and Summary

The following details the study approach to engagement and a summary of the engagement methods and outcomes.

The following principles shaped the approach to communication and engagement throughout this study. These principles were informed by DLCD's "Equitable Engagement Toolkit" and the DLCD "Racial Equity Framework" and tailored for a focus on specific interest groups and parties instead of a broader public engagement effort. These principles are:

- **Early and consistent communication.** To the extent possible, the dates and intent of our engagement opportunities to interested parties will be communicated early in the process and leading up to specific events or meetings. This approach is to enable interested parties to prioritize how they want to engage in the project and, given several concurrent and inter-related studies, manage requests for their time.
- **Accessibility.** Project information will be provided in multiple formats to accommodate differing levels of access to technology (ex. webpage, project 1-pager) and support a diversity of visual needs (ex. alt text, font size). The design of this study also seeks to provide multiple modes of engagement (survey, focus groups, interviews, written feedback) to accommodate schedules, capacity, and preference through both online and in-person opportunities to reflect interested parties perspectives.
- **Transparency.** The purpose and intended use of information gathered through engagement methods will be clearly stated during engagement activities and within the final deliverable. Information about the project, including the draft findings and recommendations, will be made publicly available on [DLCD's project webpage].
- **Collaboration.** To the extent possible, engagement methods will be designed to support relationship building among interested parties through intentional introductions, open discussions, and a balance of input from participants. This research is designed to use multiple engagement methods and tools to provide a range of ways to participate (e.g., informing, consulting, involving, collaborating).[13]

Engagement methods are detailed in the table below.

[13] International Association for Public Participation (2024) IAP2 Spectrum of Public Participation. Retrieved from https://cdn.ymaws.com/www.iap2.org/resource/resmgr/pillars/iap2_spectrum_2024.pdf

Engagement Strategy	Goal
State Agency Work Group	Provide input on research and information, methods, analysis, and recommendations at key points, identify other relevant interested parties and support engagement as appropriate.
Phase I interviews	Ground background research on key issues, confirm contents of inventory, inform design of survey and focus groups.
Phase II Interviews	To gather perspectives on, but not limited to, housing production barriers, intent and implementation of policies and programs relevant to housing production, agency effectiveness, leveraging state resources, perceived challenges, opportunities for improvement.
Multi-interest group survey	Solicit input from people knowledgeable about how state policies and programs impact housing production to identify specific administrative and regulatory challenges, assess the impact of state agency programs and identify challenge areas for further research, solicit recommendations for improvement, and query perceptions of the effectiveness of state mandated plans in achieving housing production
Focus Groups	In-depth exploration of shared experiences, challenges, and potential solutions; solicit possible solutions within the scope of the study
Deliverable Review	Identify research gaps, refine findings, and clarify recommendations.

State Agency Workgroup

A representative from each agency included within the scope of this study was invited to participate as a member of the State Agency Work Group. See Acknowledgements for full detail.

This Work Group was charged with the following:

- Attend and engage in 4-6 work group meetings
- Provide input and perspective on research tasks
- Review interim and final deliverables and coordinate internally
- Respond to email requests
- Forward resources
- Provide connections to broader networks, partner groups, and other agency staff
- Participate in interviews

State Agency Work Group meetings were held on the following dates:

- State Agency Work Group Kick-Off – Meeting #1 – September 24th, 2025
- State Agency Work Group Kick-Off – Meeting #2 – December 4th, 2025
- State Agency Work Group Kick-Off – Meeting #3 – February 4th, 2026
- State Agency Work Group Kick-Off – Meeting #4 – June 2nd, 2026

Additional requests for review, input, and resources were made as detailed below:

- Request for background materials and reports – October – November 2025 ongoing

- Request to review and provide input on the inventory through completion of a Qualtrics questionnaire: November – December 2025
- Request to schedule Phase I interviews and connect with other relevant agency staff – February – March 2026
- Request to review focus group background materials and provide input – April 2026
- Request to review draft report and coordinate internal review – June 2026
- Request to schedule Phase II interviews and connect with other relevant agency staff – June 2026
- Request to schedule follow-up meetings to clarify report details – June – July 2026

Survey

This appendix documents methods and procedures used by the IPRE to develop and administer the multi-party survey. It provides data on the characteristics of the respondent pool and summarizes key findings related to respondent perceptions of the impacts of state agency actions on housing production in Oregon.

Methods

The survey was distributed under an Institutional Review Board exemption in which survey respondents provided consent to participate in the survey on the basis that personally identifiable information would not be shared.

The purpose of the survey was to solicit input from people knowledgeable about how state policies impact housing production. To understand perspectives on the impacts of state agency actions on housing production, IPRE developed and administered an online survey to selected groups. The survey was administered online in December of 2025 and January of 2026 using a mixed mode approach. For local government, private sector housing developers, consultants, and nonprofit organizations, IPRE administered the survey by sending individualized email solicitations. The email list IPRE assembled included 1,302 names. IPRE partnered with the DLCD, HAPO, League of Oregon Cities, Association of Oregon Counties, Oregon Association of Homebuilders, the Network for Oregon Affordable Housing, housing authorities, OHCS, DSL, and the Oregon chapters of the American Planning Association and Institute of Architects who provided email lists or emailed their members through their distribution lists. Because our methodology targeted specific parties, we present the number of respondents rather than response rates.

Interested Parties included in the survey

<u>Public Sector</u>

- Planners
- Public works
- City managers/administrators/clerks
- Trade board members

<u>Private Sector</u>

- Developers
- Builders
- Trades
- Industry consultants

<u>Nonprofit Sector</u>

- Developers
- Advocacy organizations

A total of 687 individuals participated in the survey. We did not require respondents to answer all questions (sometimes called forced response) so not all survey participants answered every question. To better characterize the size of the respondent pool for each question we present the number of respondents (n) along with the summary data in the tables and charts that follow.

Survey Research Framework

To assess how state agency actions influence housing production in Oregon, the research team implemented a multi-stage, mixed-methods survey framework designed to collect informed perspectives from individuals directly involved in housing development, land use planning, infrastructure, permitting, and housing finance. The framework emphasized respondent expertise, broad interested party representation, and multiple forms of analysis to ensure findings were both rigorous and actionable. The intention of the survey was to filter state agency actions that are most beneficial and detrimental to housing production.

Step 1: Identification of State Agencies and Agency Actions

The first step consisted of developing a comprehensive inventory of state agency actions that potentially influence housing production. The inventory included statutes, administrative rules, programs, funding mechanisms, technical assistance activities, planning requirements, permitting processes, and agency procedures. Actions relate to multiple phases of the development process, including land supply, infrastructure, financing, permitting, and administrative processes.

An interagency working group representing the ten participating state agencies reviewed and refined the inventory to ensure that the list accurately reflected agency responsibilities and included the most relevant actions affecting housing development. This collaborative process provided a common framework that guided all subsequent phases of the survey.

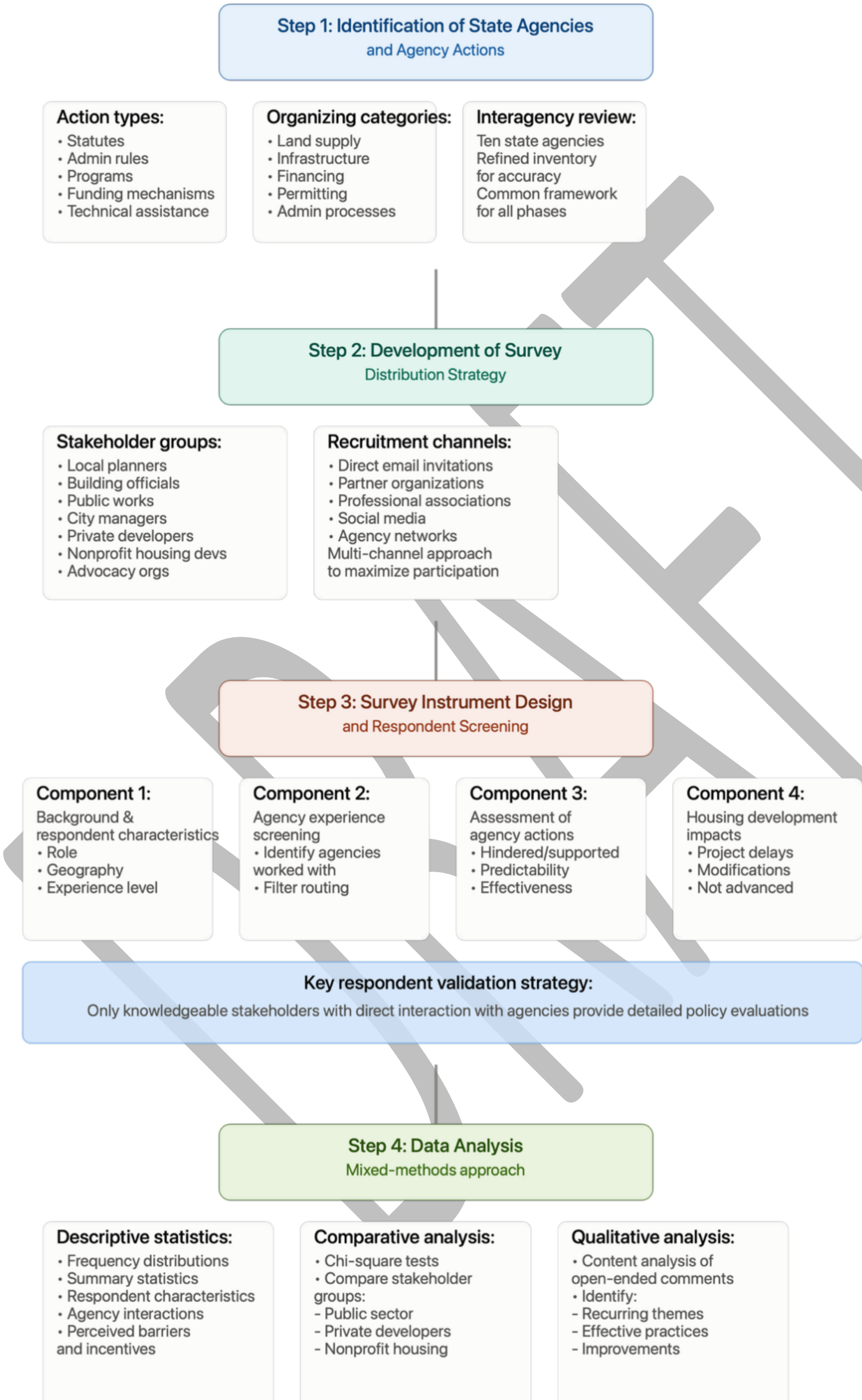
Step 2: Survey Distribution Strategy

The survey was designed to capture perspectives from a broad range of stakeholders with direct experience in housing production and related regulatory systems. Distribution lists were developed representing:

- Local government planners
- Building officials
- Public works professionals
- Wetlands experts
- City managers and administrators
- Private developers and homebuilders
- Construction trades and consultants
- Nonprofit housing developers
- Housing and environmental advocacy organizations
- Industry and professional associations

The survey was distributed through direct email invitations, partner organizations, and broader outreach methods including professional association communications, social media, and agency networks. This multi-channel recruitment approach was intended to maximize participation from individuals actively engaged in housing development and housing-related decision making.

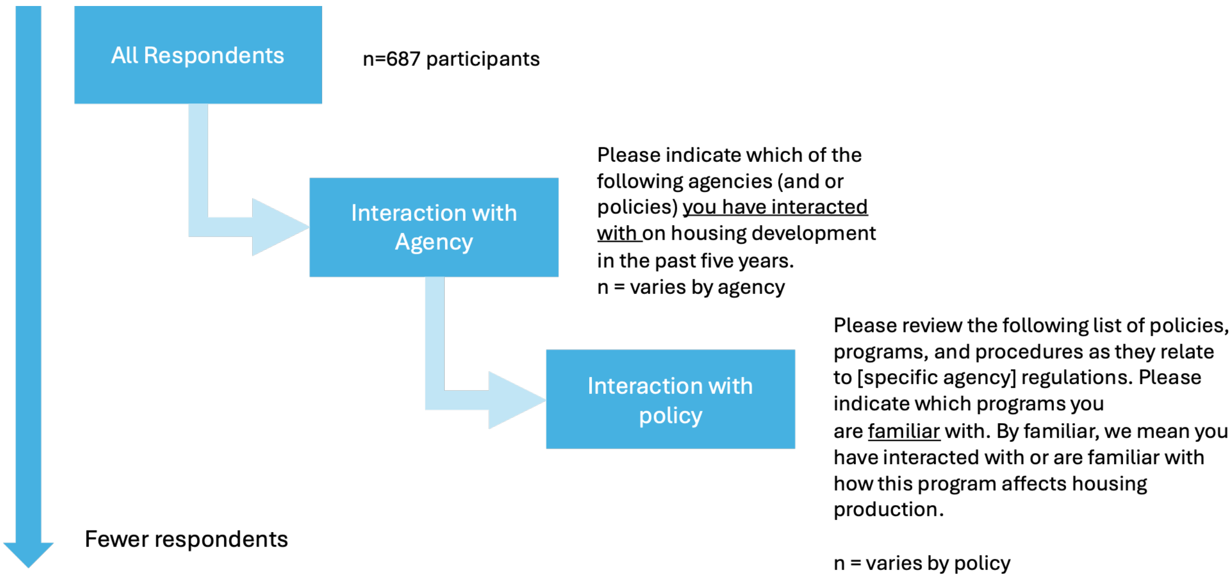
Exhibit 4. Survey Research Process



Step 3: Survey Instrument Design and Respondent Screening

The survey instrument was designed to gather both quantitative and qualitative data while ensuring that respondents provided input only on agency actions with which they had sufficient experience.

Exhibit 5. Participant Screening Process



The instrument consisted of four primary components:

- **Background and Respondent Characteristics**. The survey initially collected information regarding: (1) organizational affiliation; (2) professional role; (3) geographic area of work; (4) housing-related experience; and (5) Self-assessed knowledge of housing production issues. These questions provided context for analyzing responses across different stakeholder groups.
- **Agency Experience Screening.** Respondents were asked to identify which state agencies they had worked with or encountered in the course of housing-related activities over the last five years. Only the agencies selected by respondents were presented for detailed evaluation. This filtering process reduced the likelihood that respondents would provide opinions on agencies or programs with which they had little or no direct experience.
- **Assessment of Agency Actions**. For each agency selected, respondents were directed to specific actions, programs, regulations, or permitting processes associated with that agency. Agency actions were organized in two categories: (1) actions that hinder housing production (e.g., regulations); and (2) actions that benefit housing production (e.g., funding and technical assistance). Respondents evaluated each action using structured closed-ended questions measuring factors such as:
    - Degree to which the action hindered housing production
    - Degree to which the action supported housing production
    - Predictability

- Efficiency
- Clarity
- Overall effectiveness

Respondents who rated an action "extreme" or "significantly" hinder or benefit housing were also given opportunities to provide closed and open-ended comments explaining their experiences and recommendations. With respect to regulations, the survey asked respondents to select any (e.g., select all that apply) of the following list of "What aspects of the program administration or implementation hinder production?"

- ☐ The procedures are difficult to navigate
- ☐ The procedures are rigid
- ☐ It is time consuming to access resources
- ☐ It takes a significant amount of time to hear a decision from this program
- ☐ It takes a significant amount of time to receive approval on this regulation
- ☐ Staff are overwhelmed or not well trained or prepared.
- ☐ Staff are unresponsive to questions
- ☐ This program contradicts another state program
- ☐ This program is not well coordinated with other state policies/programs
- ☐ Rules or procedures are applied inconsistently or vary by region.
- ☐ Program priorities do not respond to need or demand
- ☐ Program increases risks

A different set of options were provided for technical assistance / incentives:

- ☐ The policies or guidelines are clear
- ☐ The policies or guidelines are flexible
- ☐ The process to access this resource does not take a significant amount of time.
- ☐ There is sufficient funding in this program to make a difference
- ☐ The agency provides funding decisions quickly
- ☐ The agency provides approval to proceed quickly
- ☐ Staff are responsive to questions
- ☐ Program priorities are responsive to need or demand
- ☐ The program effectively addresses the stated intent
- ☐ This program is well coordinated with other state policies/programs

Respondent Validation Strategy

A key methodological feature was the use of respondent screening and routing techniques to improve response quality. Rather than collecting opinions from the general public, the survey focused on knowledgeable stakeholders in the housing production sphere and limited detailed policy evaluations to respondents who reported direct interaction with relevant agencies or programs.

This approach is consistent with key-informant and stakeholder assessment methods commonly used in policy evaluation research and was intended to strengthen the validity of findings by linking responses to demonstrated experience.

Exhibit 6. List of Regulatory Actions Included in the Survey

Agency	Policy
DEQ	Regional Brownfields Program
DEQ	Asbestos Program
DEQ	Water Quality Certification
DEQ	Total Daily Maximum Load (TMDL)
DEQ	Greywater
DEQ	1200 Series Construction Stormwater Permits
DEQ	National Pollution Discharge and Elimination System Permits
DEQ	MS4 Phase I
DEQ	MS4 Phase II
DEQ	Land Use Compatibility Statement (LUCS)
DEQ	Underground Injection Control
DEQ	Site Assessment, Environmental Cleanup
DEQ	Septic system permitting
DEQ	Heating Oil Tanks Program
OHCS	Affordable Rental Housing Development Programs
OHCS	Howmownership Division
OHCS	Oregon Centralized Application (ORCA)
DSL	Compensatory Wetland Mitigation
DSL	Land Sales and Exchanges
DSL	Removal-Fill Permit
DSL	Wetland Land Use Notices
DSL	Approval of Local Wetlands Inventory
DSL	Wetland Delineation
DSL	Wetland Determination
ODOT	Access (Driveway) Permits
ODOT	Climate Friendly and Equitable Communities (CFEC)
ODOT	Traffic Impact Analysis (TIA)
ODOT	Transportation Planning Rule (TPR)
ODOT	Utility Permits
OHA/DWS	Drinking Water Protection Program
OHA/DWS	Plan Review (water system plan review, water system infrastructure projects)
DCBS/BCD	Manufactured Dwelling Design and Construction
DCBS/BCD	Manufactured Home Ownership Document System (MHODS)
DCBS/BCD	Manufactured Home Permit, Inspection and Insignia Application
DCBS/BCD	Oregon State Building Codes
DCBS/BCD	Prefabricated Structures Program
DCBS/BCD	Prefabricated Structure Plan Review
DCBS/BCD	Prefabricated Structure Insignia of Compliance
DCBS/BCD	Prefabricated Structure Inspection Request
DLCD	Housing Program
DLCD	Housing Accountability and Production Office
DLCD	Local Comprehensive Plan Statutes
DLCD	Oregon Land Use Planning Program
DLCD	Oregon Housing Needs Analysis (OHNA)
DLCD	Urban Growth Boundary (UGB) Statutes
DLCD	UGB streamlining (Division 38 rule)
OPRD/SHPO	Archealogical reporting
OPRD/SHPO	Certified Local Government Program
OPRD/SHPO	Oregon Main Street Program
OPRD/SHPO	National Register of Historic Places
OPRD/SHPO	Permit and Conditions for Excavation or Removal of Archaeological or Historic Materials
OPRD/SHPO	SHPO Consultation (historic, archaeological, or cultural resource protection or compliance, Section 106)

Exhibit 7. List of Incentive/Technical Assistance Actions Included in the Survey

Agency	Policy
DEQ	Clean Water State Revolving Fund
DEQ	Low-Embodied Carbon Housing Program
DEQ	Brownfields - Environmental Cleanup
DLCD	Transportation and Growth Management Program (TGM)
DLCD	Community Green Infrastructure Program
DLCD	HAPO Technical Assistance Funds
DLCD	Housing Planning Assistance
DLCD	Wetland Technical Assistance Grant
OHA	Cross Connection and Backflow Prevention Program
OHA	Safe Drinking Water Revolving Loan Fund (SDWRLF) - Design, engineering, and construction projects
OHA	Sustainable Infrastructure Planning Projects (SIPP) - As part of the SDWRLF
OHCS	501C3 Conduit Bonds
OHCS	Agricultural Workforce Housing Tax Credit
OHCS	Community Development Block Grant (CDBG)
OHCS	Construction Loan Guarantee
OHCS	General Housing Account Program
OHCS	General Housing Account Program - Capacity Building
OHCS	General Housing Account Program - Veteran's
OHCS	Homeownership Development Incubator Program (HDIP)
OHCS	Housing Development Grant Program (HGDP)
OHCS	Land Acquisition Revolving Loan Program
OHCS	Local Innovation and Fast Track (LIFT) - Homeownership
OHCS	Local Innovation and Fast Track (LIFT) - Rental
OHCS	Low-Income Housing Tax Credit (LIHTC)
OHCS	Manufactured Home Replacement Program
OHCS	Moderate Income Revolving Loan Fund (MIRL)
OHCS	Modular Housing Development Fund
OHCS	National Housing Trust Fund
OHCS	Oregon Affordable Housing Tax Credit
OHCS	Permanent Loan Guarantee
OHCS	Permanent Supportive Housing
OHCS	Predevelopment Funding
OHCS	The Home Investment Partnerships Program
BO	Brownfields Properties Revitalization Fund
BO	Brownfields Properties Revitalization Fund
BO	Circuit Riders Technical Assistance
BO	Child Care Infrastructure Program
BO	Community Development Block Grant (CDBG)
BO	Housing Infrastructure Finance Program
BO	Infrastructure Housing Development Projects
BO	One-Stop Financing Roundtable (Infrastructure)
BO	Safe Drinking Water Revolving Loan Fund (SDWRLF) - Design, engineering, and construction projects
BO	Special Public Works Fund (SPWF)
BO	Sustainable Infrastructure Planning Projects (SIPP) - As part of the SDW
BO	Water/Wastewater Fund (WWF) - Infrastructure Project Loan
BO	Water/Wastewater Fund (WWF) - Planning Grant
ODOT	Oregon Transportation Infrastructure Bank
ODOT	Small City Allotment Program
DBCS/BCD	Master Plans Program
DBCS/BCD	Permit Ready Plans Program
OPDR/SHPO	Oregon Main Street Revitalization Grant
OPDR/SHPO	Special Assessment for Historic Properties
OPDR/SHPO	Federal Tax Credit for Historic Properties
OPDR/SHPO	State Tax Credit for Historic Properties
RS	Regional Solutions (program)

Step 4: Data Analysis

The analysis combined quantitative and qualitative methods.

A. Descriptive Statistical Analysis. Frequency distributions and summary statistics were used to describe:

- Respondent characteristics
- Agency interactions
- Perceived barriers and incentives
- Ratings of specific agency actions

These analyses established overall response patterns across the full sample.

B. Comparative Analysis. The research team ran chi-square tests on a range of variables to determine if statistically significant differences existed in the rating of agency actions. Chi-square is a common and simple method used for hypothesis testing. The general concept in the chi-square independence test is to compare the observed values with expected values to determine if a statistically significant relationship exists between the variables. In this instance the research team tested to determine whether a statistically significant relationship exists between perceptions of state agency actions and several elements of the sample population. The null hypothesis (N_O)is that no relationship exists.

We ran chi-square tests on five variables that can be broadly classified into three groups:

- <u>Respondent pool</u>. We ran chi-square tests to determine if perceptions of barriers varied by respondent pool (e.g., public sector, private sector developers, and non-profit developers)
- <u>Population</u>. We used 10,000 as the population threshold for these tests because several state policies use this population threshold. The test generally determines whether differences in perceptions exist between large and small communities.
- <u>Geography</u>. We ran chi-square on three variations of geography: (1) the seven DLCD regions; (2) DLCD regions collapsed into three categories (Portland Metro, Willamette Valley, rest of state); and (3) whether the community is in one of Oregon's eight MPOs (metropolitan planning organizations).

We include a table for each category of barriers that shows whether statistically significant relationships exist between the variables and perceptions of the severity of each barrier. We classify the p-values (probability values) into three groups. The table below shows the p-value categories.

P-value	Symbol	Interpretation
<=0.05 and >0.01	*	Between 1% and 5% chance that N_O is true
<=0.01 and >0.001	**	Between 0.1% and 1% chance that N_O is true
<=0.001	***	Less than 0.1% chance that N_O is true

With the exception of participant group (sector) , few actions showed statistically significant difference. The purpose was to determine whether differences in perceptions of agency actions were statistically significant across stakeholder groups.

Exhibit 8. Chi-Square Results for Regulations by Participant Group and Stakeholder

Note: data are only included for actions that had statistically significant relationships

				Extreme Barrier				
Agency	Policy	P-Value	Significant	Local Govt	Private Dev	Nonprofit	All	n
DEQ	Regional Brownfields Program	0.510						
DEQ	Asbestos Program	0.556						
DEQ	Water Quality Certification	0.066						
DEQ	Total Daily Maximum Load (TMDL)	0.532						
DEQ	Greywater	0.411						
DEQ	1200 Series Construction Stormwater Permits	0.002	**	6%	21%	0%	9%	107
DEQ	National Pollution Discharge and Elimination System Permits	0.336						
DEQ	MS4 Phase I	0.005	**	0%	50%	0%	8%	24
DEQ	MS4 Phase II	0.051						
DEQ	Land Use Compatibility Statement (LUCS)	0.032	*	4%	10%	0%	5%	121
DEQ	Underground Injection Control	0.777						
DEQ	Site Assessment, Environmental Cleanup	0.100						
DEQ	Septic system permitting	0.178						
DEQ	Heating Oil Tanks Program	0.167						
OHCS	Affordable Rental Housing Development Programs	0.079						
OHCS	Howmownership Division	0.275						
OHCS	Oregon Centralized Application (ORCA)	0.692						
DSL	Compensatory Wetland Mitigation	0.021	*	34%	32%	33%	33%	82
DSL	Land Sales and Exchanges	0.821						
DSL	Removal-Fill Permit	0.217						
DSL	Wetland Land Use Notices	0.151						
DSL	Approval of Local Wetlands Inventory	0.172						
DSL	Wetland Delineation	0.053						
DSL	Wetland Determination	0.007	**	24%	21%	33%	24%	111
ODOT	Access (Driveway) Permits	0.005	**	4%	19%	7%	7%	137
ODOT	Climate Friendly and Equitable Communities (CFEC)	0.000	***	17%	73%	0%	28%	76
ODOT	Traffic Impact Analysis (TIA)	0.047	*	7%	20%	18%	11%	149
ODOT	Transportation Planning Rule (TPR)	0.012	*	9%	28%	0%	12%	108
ODOT	Utility Permits	0.001	***	4%	24%	0%	9%	90
OHA/DWS	Drinking Water Protection Program	0.194						
OHA/DWS	Plan Review (water system plan review, water system infrastructure projects)	0.085						
DCBS/BCD	Manufactured Dwelling Design and Construction	0.045	*	4%	33%	0%	6%	52
DCBS/BCD	Manufactured Home Ownership Document System (MHODS)	0.019	*	0%	50%	0%	5%	19
DCBS/BCD	Manufactured Home Permit, Inspection and Insignia Application	0.000	***	0%	33%	0%	2%	49
DCBS/BCD	Oregon State Building Codes	0.022	*	3%	24%	0%	6%	128
DCBS/BCD	Prefabricated Structures Program	0.357						
DCBS/BCD	Prefabricated Structure Plan Review	0.137						
DCBS/BCD	Prefabricated Structure Insignia of Compliance	0.721						
DCBS/BCD	Prefabricated Structure Inspection Request	0.741						
DLCD	Housing Program	0.071						
DLCD	Housing Accountability and Production Office	0.209						
DLCD	Local Comprehensive Plan Statutes	0.009	**	10%	32%	0%	12%	149
DLCD	Oregon Land Use Planning Program	0.127						
DLCD	Oregon Housing Needs Analysis (OHNA)	0.132						
DLCD	Urban Growth Boundary (UGB) Statutes	0.000	***	21%	66%	0%	27%	171
DLCD	UGB streamlining (Division 38 rule)	0.098						
OPRD/SHPO	Archealogical reporting	0.349						
OPRD/SHPO	Certified Local Government Program	0.007	**	3%	100%	0%	6%	34
OPRD/SHPO	Oregon Main Street Program	0.412						
OPRD/SHPO	National Register of Historic Places	0.395						
OPRD/SHPO	Permit and Conditions for Excavation or Removal of Archaeological or Historic Materials	0.100						
OPRD/SHPO	SHPO Consultation (historic, archaeological, or cultural resource protection or compliance, Section 106)	0.167						

Exhibit 9. Chi-Square Results for Incentives/Technical Assistance by Participant Group and Stakeholder

Note: data are only included for actions that had statistically significant relationships

				Extreme Barrier				
Agency	Policy	P-Value	Significant	Local Govt	Private Dev	Nonprofit Dev	All	n
DEQ	Clean Water State Revolving Fund	0.700						
DEQ	Low-Embodied Carbon Housing Program	0.535						
DEQ	Brownfields - Environmental Cleanup	0.453						
DLCD	Transportation and Growth Management Program (TGM)	0.401						
DLCD	Community Green Infrastructure Program	0.133						
DLCD	HAPO Technical Assistance Funds	0.633						
DLCD	Housing Planning Assistance	0.254						
DLCD	Wetland Technical Assistance Grant	0.482						
OHA	Cross Connection and Backflow Prevention Program	0.266						
OHA	Safe Drinking Water Revolving Loan Fund (SDWRLF) - Design, engineering, and construction projects	0.000	***	24%	0%	0%	24%	51
OHA	Sustainable Infrastructure Planning Projects (SIPP) - As part of the SDWRLF	0.156						
OHCS	501C3 Conduit Bonds	0.082						
OHCS	Agricultural Workforce Housing Tax Credit	0.343						
OHCS	Community Development Block Grant (CDBG)	0.178						
OHCS	Construction Loan Guarantee	0.577						
OHCS	General Housing Account Program	0.674						
OHCS	General Housing Account Program - Capacity Building	0.074						
OHCS	General Housing Account Program - Veteran's	0.057						
OHCS	Homeownership Development Incubator Program (HDIP)	0.008	**	0%	38%	71%	48%	40
OHCS	Housing Development Grant Program (HGDP)	0.071						
OHCS	Land Acquisition Revolving Loan Program	0.653						
OHCS	Local Innovation and Fast Track (LIFT) - Homeownership	0.055						
OHCS	Local Innovation and Fast Track (LIFT) - Rental	0.043	*	44%	64%	65%	58%	94
OHCS	Low-Income Housing Tax Credit (LIHTC)	0.404						
OHCS	Manufactured Home Replacement Program	0.311						
OHCS	Moderate Income Revolving Loan Fund (MIRL)	0.169						
OHCS	Modular Housing Development Fund	0.411						
OHCS	National Housing Trust Fund	0.109	*	36%	50%	27%	39%	40
OHCS	Oregon Affordable Housing Tax Credit	0.018	**	35%	23%	62%	42%	87
OHCS	Permanent Loan Guarantee	0.172						
OHCS	Permanent Supportive Housing	0.004	***	14%	14%	62%	31%	78
OHCS	Predevelopment Funding	0.456						
OHCS	The Home Investment Partnerships Program	0.339						
BO	Brownfields Properties Revitalization Fund	0.477						
BO	Brownfields Properties Revitalization Fund	0.572						
BO	Circuit Riders Technical Assistance	0.611						
BO	Child Care Infrastructure Program	0.674						
BO	Community Development Block Grant (CDBG)	0.961						
BO	Housing Infrastructure Finance Program	0.828						
BO	Infrastructure Housing Development Projects	0.519						
BO	One-Stop Financing Roundtable (Infrastructure)	0.787						
BO	Safe Drinking Water Revolving Loan Fund (SDWRLF) - Design, engineering, and construction projects	0.772						
BO	Special Public Works Fund (SPWF)	0.826						
BO	Sustainable Infrastructure Planning Projects (SIPP) - As part of the SDW	0.688						
BO	Water/Wastewater Fund (WWF) - Infrastructure Project Loan	0.444						
BO	Water/Wastewater Fund (WWF) - Planning Grant	0.815						
ODOT	Oregon Transportation Infrastructure Bank	0.003	***	20%	0%	0%	20%	31
ODOT	Small City Allotment Program	0.569						
DBCS/BCD	Master Plans Program	0.238						
DBCS/BCD	Permit Ready Plans Program	0.979						
OPDR/SHPO	Oregon Main Street Revitalization Grant	0.104						
OPDR/SHPO	Special Assessment for Historic Properties	0.082						
OPDR/SHPO	Federal Tax Credit for Historic Properties	0.442						
OPDR/SHPO	State Tax Credit for Historic Properties	0.135						
RS	Regional Solutions (program)	0.676						

C. Qualitative Content Analysis. Open-ended survey comments were analyzed using content-analysis techniques to identify:

- Recurring themes
- Perceived barriers
- Effective practices
- Recommendations for improvement

The qualitative analysis provided explanatory context for the statistical findings and highlighted issues that may not be captured through closed-ended survey questions alone. The survey also included additional open-ended questions that were intended to solicit detailed comments from survey participants:

- If you could pick one existing state statute, policy, or program that **you think is most beneficial** to housing production, which one would you pick and why?
- If you could pick one existing state statute, policy, or program that **you think is most detrimental** to housing production, which one would you pick and why?
- Is there anything else you would like to add related to housing production in Oregon?

The research team compiled the written comments and conducted content analysis to draw out key themes.

Characteristics of Respondents

A total of 687 individuals participated in the survey. Of these 320 were through email solicitations and 401 through the survey link distributed by IPRE's partners. Of these 518 responses were complete and 210 were partially complete. Exhibit 10 shows responses by type of respondent. Fifty-one percent of the respondents were from public sector organizations (primarily local governments), 27 percent from the private homebuilding industry, 14 percent nonprofit housing developers, five percent trade or advocacy organizations, and five percent from other affiliations.

Exhibit 10. Responses by Interested Party Group

Type of Respondent	Number	Percent
Public Sector	347	51%
Private Sector	184	27%
Nonprofit Sector	94	14%
Advocacy Organization	12	2%
Trade Association or Organization	18	3%
Other	32	5%
Total	**687**	**100%**

Source: IPRE multi-party survey, 2026

Exhibit 11 shows a more detailed breakdown of respondents by type. The largest respondent group was city government (237 responses or 40% of responses). This includes planners, city managers, housing specialists, and others who represent local government.

Exhibit 11. Survey Responses by Type of Respondent

Role	Number	Percent
City Government	237	40%
County Government	51	9%
State Government	17	3%
Regional Council of Government/ Metropolitan Planning Organization	9	2%
Private sector developer (e.g. creating subdivisions, master planned developments, etc.)	25	4%
Private sector homebuilder	7	1%
Private sector developer and homebuilder	32	5%
Private sector contractor/skilled trade	13	2%
Nonprofit housing developer	52	9%
Nonprofit housing organization	13	2%
Development industry consultant	53	9%
Other	89	15%
Total	**598**	**100%**

Source: IPRE multi-party survey, 2026

Exhibit 12 shows survey respondents by role(s) as reported by the respondent (note that respondents could select more than one role). The results show the sample reflects a wide range of roles implying that a diversity of perspectives on housing production a represented in the sample. Roles most frequently selected included long range planning (27%), current planning (25%), and housing (25%).

Exhibit 12. Survey Responses by Role of Respondent

Role	Number	Percent
Land use - long range planning	159	27%
Land use - current planning	151	25%
Transportation or public works	83	14%
Housing	149	25%
Code enforcement	111	19%
Environment	59	10%
Administration	116	19%
Building codes	108	18%
Legal	22	4%
Policy	96	16%
Other	20	3%

Source: IPRE multi-party survey, 2026
Note: Percent column adds to more than 100% because respondents could select multiple roles

Exhibit 13 shows survey responses by region where respondents reported working. The regions listed in the table correspond to regions used by the Department of Land Conservation and Development (DLCD) Seventeen percent of the respondents reported working statewide. As expected, the Portland Metro region had the largest percentage of response at 31 percent. Notably, all other regions had meaningful percentages of respondents implying the survey sample represents perspectives from all regions of the state.

Exhibit 13. Survey Responses by Region Respondent Works In

Region	Count	Percent
Statewide	104	17%
Central Oregon (Counties of Crook, Deschutes, Hood River, Jefferson, Klamath, Lake, & Wasco)	81	14%
Eastern Oregon (Counties of Harney, Malheur, Sherman, Wallowa, Union, Baker, Grant, Umatilla, Morrow, Gillham, Wheeler)	60	10%
Mid-Willamette Valley (Counties of Marion, Polk & Yamhill)	98	16%
South-Willamette Valley (Counties of Benton, Linn, Lane except coastal portion)	103	17%
North Coast and Lower Columbia (Counties of Clatsop, Lincoln, Tillamook & Columbia)	77	13%
Portland Metro (Counties of Clackamas, Multnomah, Washington, & the city of Portland)	183	31%
South Coast (Coos & Curry counties plus coastal portions of Douglas & Lane Counties)	54	9%
Southern Oregon (Counties of Douglas, Jackson, Josephine, except coastal Douglas County)	72	12%

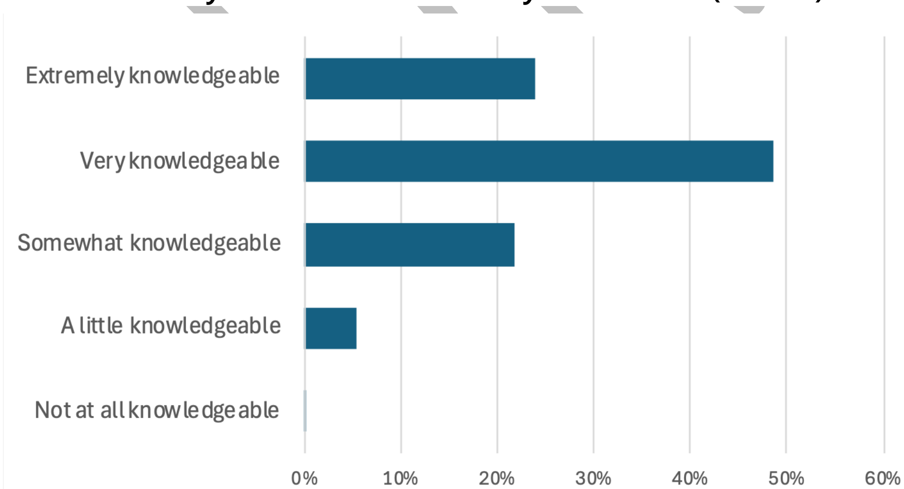
Source: IPRE multi-party survey, 2026
Note: Percent column adds to more than 100% because respondents could select multiple roles

Survey Findings

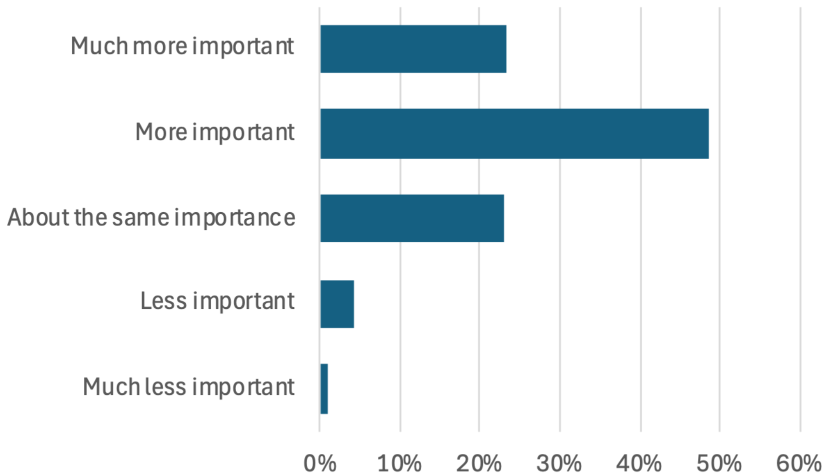
The following sections provide key data from the survey. The data are presented as tables or charts with no accompanying narrative other than the survey question.

General knowledge and perceptions of housing issues in Oregon

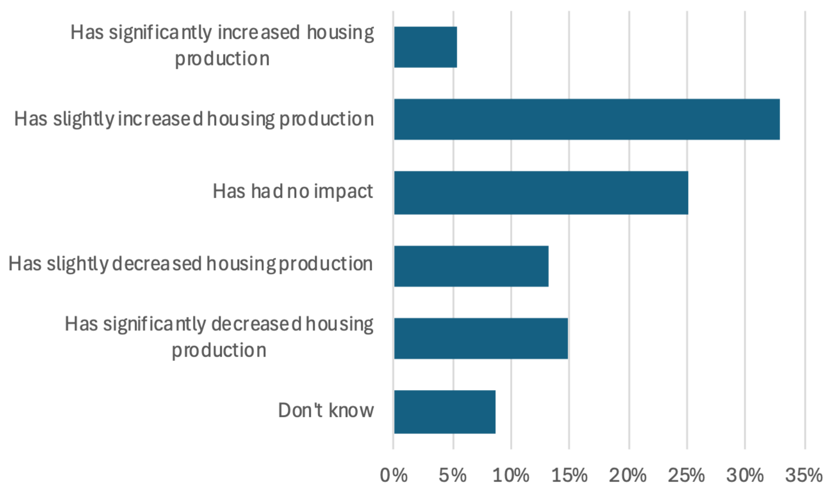
Please indicate the extent to which you feel knowledgeable about housing issues in the community or the communities you work in. (n=648)



Please indicate the extent to which you perceive housing production to be important relative to other issues in your community or the communities you work in. (n=645)



Overall, how do you think state agency actions have impacted housing production in your community in the past three years? (n=264)



Note: This question was asked of respondents who selected "city government," "county government," or "state government" above.

Our 2022 survey focused on barriers to housing production. The list presented below are the top 15 barriers identified in our previous survey. Please indicate the extent to which the following are or are not barriers to housing production in your community.

Factor	Not a Barrier	Minor Barrier	Moderate Barrier	Extreme Barrier	n
High construction Costs (materials)	1%	8%	44%	**47%**	558
High construction Costs (labor)	2%	9%	**45%**	43%	549
Insufficient workers in skilled trades	5%	22%	**43%**	29%	516
High cost/limited supply of skilled labor (e.g. licensed tradespersons)	5%	20%	**43%**	33%	521
High cost/limited supply of construction workers, generally	6%	24%	**44%**	26%	518
Limited ability for low and moderate income households to compete in the market	4%	8%	21%	**67%**	554
Developers are not building enough housing that is needed and affordable	6%	13%	26%	**55%**	557
Developers are not building the types of housing needed for different household compositions and incomes	7%	14%	28%	**50%**	561
Lack of contractor capacity	13%	35%	**36%**	16%	498
High cost of land	3%	12%	30%	**55%**	553
Inability to bring land to a development ready state (e.g. bringing tract land to serviced lots ready for development)	5%	19%	29%	**47%**	536
Lack of available vacant buildable lots (e.g. for sale or owned by builders)	8%	22%	33%	**37%**	549
Not enough workers for other jobs	20%	**36%**	30%	14%	455
Funding to finance infrastructure improvements	3%	11%	29%	**57%**	523
City System Development Charges (SDCs)	11%	22%	31%	**36%**	536

Experience with State Agencies and Perceptions of Barriers

This section delves into the specific impacts of regulations administered by various Oregon state agencies on housing production and affordability. It acknowledges the intricate nature of state regulations and their diverse effects across different development contexts.

Please indicate which of the following agencies (and or policies) you have interacted with on housing development in the past five years. (Select all that apply).

Agency	%	Count
Oregon Department of Environmental Quality (DEQ)	54%	351
Oregon Department of State Lands (DSL)	40%	257
Department of Land Conservation and Development (DLCD)	55%	356
Oregon Health Authority (OHA)	23%	147
Oregon Housing and Community Services (OHCS)	42%	273
Oregon Business Development Department (Business Oregon)	32%	208
Oregon Department of Transportation (ODOT)	50%	324
Department of Consumer and Business Services/ Building Codes Division (DCBS/BCD)	41%	267
Oregon Parks and Recreation Department (OPRD) (State Historic Preservation Office)	25%	160
Regional Solutions	24%	152

Summary of Regulatory Actions

Agency	Policy	Does Not Hinder Housing Production	Somewhat Hinders Housing Production	Significantly Hinders Housing Production	Extremely Hinders Housing Production	n
DEQ	Regional Brownfields Program	61%	24%	6%	3%	109
DEQ	Asbestos Program	53%	33%	7%	4%	95
DEQ	Water Quality Certification	42%	35%	10%	9%	108
DEQ	Total Daily Maximum Load (TMDL)	34%	34%	14%	11%	85
DEQ	Greywater	39%	39%	10%	7%	59
DEQ	1200 Series Construction Stormwater Permits	37%	39%	13%	8%	149
DEQ	National Pollution Discharge and Elimination System Permits	35%	42%	5%	14%	74
DEQ	MS4 Phase I	29%	41%	15%	9%	34
DEQ	MS4 Phase II	28%	31%	24%	10%	29
DEQ	Land Use Compatibility Statement (LUCS)	51%	25%	13%	8%	160
DEQ	Underground Injection Control	37%	42%	13%	0%	38
DEQ	Site Assessment, Environmental Cleanup	25%	41%	22%	9%	113
DEQ	Septic system permitting	38%	39%	16%	6%	128
DEQ	Heating Oil Tanks Program	67%	24%	2%	7%	58
OHCS	Affordable Rental Housing Development Programs	31%	33%	11%	17%	133
OHCS	Oregon Centralized Application (ORCA)	35%	28%	11%	24%	82
OHCS	Homeownership Division	45%	28%	9%	12%	65
DSL	Compensatory Wetland Mitigation	10%	46%	15%	26%	110
DSL	Land Sales and Exchanges	39%	30%	11%	11%	44
DSL	Removal-Fill Permit	18%	42%	19%	20%	134

Agency	Policy	Does Not Hinder Housing Production	Somewhat Hinders Housing Production	Significantly Hinders Housing Production	Extremely Hinders Housing Production	n
DSL	Wetland Land Use Notices	33%	37%	16%	12%	119
DSL	Approval of Local Wetlands Inventory	30%	30%	19%	20%	115
DSL	Wetland Delineation	14%	45%	20%	18%	167
DSL	Wetland Determination	16%	42%	19%	22%	147
ODOT	Access (Driveway) Permits	32%	43%	16%	8%	180
ODOT	Climate Friendly and Equitable Communities (CFEC)	31%	31%	14%	25%	111
ODOT	Traffic Impact Analysis (TIA)	18%	46%	22%	14%	196
ODOT	Transportation Planning Rule (TPR)	28%	38%	22%	13%	144
ODOT	Utility Permits	35%	34%	19%	10%	124
OHA/DWS	Drinking Water Protection Program	35%	37%	14%	14%	65
OHA/DWS	Plan Review (water system plan review, water system infrastructure projects)	55%	22%	13%	9%	67
DCBS/BCD	Manufactured Dwelling Design and Construction	71%	22%	5%	2%	96
DCBS/BCD	Manufactured Home Ownership Document System (MHODS)	57%	32%	5%	3%	37
DCBS/BCD	Manufactured Home Permit, Inspection and Insignia Application	68%	17%	9%	4%	82
DCBS/BCD	Oregon State Building Codes	30%	50%	14%	7%	200
DCBS/BCD	Prefabricated Structures Program	62%	25%	11%	1%	76
DCBS/BCD	Prefabricated Structure Plan Review	63%	18%	12%	5%	65
DCBS/BCD	Prefabricated Structure Insignia of Compliance	69%	18%	8%	4%	51
DCBS/BCD	Prefabricated Structure Inspection Request	66%	16%	10%	6%	50
DLCD	Housing Program	45%	32%	6%	10%	155
DLCD	Housing Accountability and Production Office	49%	24%	12%	11%	188
DLCD	Local Comprehensive Plan Statutes	27%	42%	13%	16%	190
DLCD	Oregon Land Use Planning Program	20%	38%	20%	18%	217
DLCD	Oregon Housing Needs Analysis (OHNA)	44%	30%	13%	10%	209
DLCD	Urban Growth Boundary (UGB) Statutes	14%	34%	23%	28%	225
DLCD	UGB streamlining (Division 38 rule)	47%	18%	11%	19%	110
OPRD/SHPO	Archeological reporting	27%	41%	28%	5%	64
OPRD/SHPO	Certified Local Government Program	52%	34%	7%	7%	44
OPRD/SHPO	Oregon Main Street Program	84%	11%	0%	5%	56
OPRD/SHPO	National Register of Historic Places	37%	43%	11%	9%	79
OPRD/SHPO	Permit and Conditions for Excavation or Removal of Archaeological or Historic Materials	17%	42%	23%	15%	52
OPRD/SHPO	SHPO Consultation (historic, archaeological, or cultural resource protection or compliance, Section 106)	23%	43%	19%	15%	86

Summary of Incentive Actions

Agency	Policy	Does Not Benefit Housing Production	Somewhat Benefits Housing Production	Significantly Benefits Housing Production	Extremely Benefits Housing Production	n
DEQ	Clean Water State Revolving Fund	18%	44%	20%	15%	66
DEQ	Low-Embodied Carbon Housing Program	36%	42%	6%	15%	33
DEQ	Brownfields - Environmental Cleanup	16%	39%	28%	10%	89
DLCD	Transportation and Growth Management Program (TGM)	11%	51%	24%	9%	152
DLCD	Community Green Infrastructure Program	30%	37%	15%	7%	60
DLCD	HAPO Technical Assistance Funds	14%	46%	24%	12%	102
DLCD	Housing Planning Assistance	9%	41%	33%	13%	131
DLCD	Wetland Technical Assistance Grant	25%	43%	17%	11%	63
OHA	Cross Connection and Backflow Prevention Program	41%	36%	16%	7%	61
OHA	Safe Drinking Water Revolving Loan Fund (SDWRLF) - Design, engineering, and construction projects	7%	30%	37%	24%	46
OHA	Sustainable Infrastructure Planning Projects (SIPP) - As part of the SDWRLF	17%	29%	29%	25%	24
OHCS	Local Innovation and Fast Track (LIFT) - Rental	6%	11%	23%	59%	100
OHCS	Local Innovation and Fast Track (LIFT) - Homeownership	5%	10%	28%	55%	78
OHCS	Low-Income Housing Tax Credit (LIHTC)	3%	10%	31%	53%	128
OHCS	Predevelopment Funding	5%	13%	27%	52%	60
OHCS	Homeownership Development Incubator Program (HDIP)	12%	24%	18%	47%	34
OHCS	Permanent Loan Guarantee	11%	18%	29%	39%	28
OHCS	Oregon Affordable Housing Tax Credit	7%	26%	27%	37%	81
OHCS	Housing Development Grant Program (HGDP)	5%	32%	22%	37%	41
OHCS	501C3 Conduit Bonds	7%	29%	29%	36%	28
OHCS	Land Acquisition Revolving Loan Program	3%	33%	29%	34%	70
OHCS	General Housing Account Program - Veteran's	0%	31%	38%	31%	26
OHCS	General Housing Account Program	4%	25%	39%	30%	57
OHCS	Permanent Supportive Housing	7%	27%	35%	30%	71
OHCS	The Home Investment Partnerships Program	11%	39%	22%	28%	36
OHCS	General Housing Account Program - Capacity Building	10%	27%	34%	27%	41
OHCS	Construction Loan Guarantee	5%	37%	37%	21%	38
OHCS	National Housing Trust Fund	8%	34%	37%	21%	38

Agency	Policy	Does Not Benefit Housing Production	Somewhat Benefits Housing Production	Significantly Benefits Housing Production	Extremely Benefits Housing Production	n
OHCS	Modular Housing Development Fund	23%	23%	27%	19%	26
OHCS	Community Development Block Grant (CDBG)	11%	40%	29%	19%	111
OHCS	Agricultural Workforce Housing Tax Credit	9%	47%	22%	19%	32
OHCS	Manufactured Home Replacement Program	15%	50%	23%	12%	26
OHCS	Moderate Income Revolving Loan Fund (MIRL)	23%	34%	23%	11%	62
BO	Brownfields Properties Revitalization Fund	17%	34%	29%	20%	41
BO	Brownfields Properties Revitalization Fund	11%	43%	25%	21%	53
BO	Circuit Riders Technical Assistance	12%	59%	24%	6%	17
BO	Child Care Infrastructure Program	41%	41%	9%	9%	22
BO	Community Development Block Grant (CDBG)	7%	32%	38%	21%	94
BO	Housing Infrastructure Finance Program	5%	34%	35%	24%	62
BO	Infrastructure Housing Development Projects	7%	27%	34%	32%	44
BO	One-Stop Financing Roundtable (Infrastructure)	0%	21%	47%	32%	38
BO	Safe Drinking Water Revolving Loan Fund (SDWRLF) - Design, engineering, and construction projects	2%	21%	40%	35%	48
BO	Special Public Works Fund (SPWF)	0%	22%	39%	37%	46
BO	Sustainable Infrastructure Planning Projects (SIPP) - As part of the SDW	4%	26%	33%	33%	27
BO	Water/Wastewater Fund (WWF) - Infrastructure Project Loan	2%	29%	29%	40%	42
BO	Water/Wastewater Fund (WWF) - Planning Grant	2%	25%	36%	36%	44
ODOT	Oregon Transportation Infrastructure Bank	30%	21%	21%	18%	33
ODOT	Small City Allotment Program	26%	37%	19%	14%	57
DBCS/BCD	Master Plans Program	23%	45%	16%	10%	129
DBCS/BCD	Permit Ready Plans Program	36%	33%	18%	14%	89
OPDR/SHPO	Oregon Main Street Revitalization Grant	31%	48%	8%	10%	48
OPDR/SHPO	Special Assessment for Historic Properties	36%	42%	8%	14%	36
OPDR/SHPO	Federal Tax Credit for Historic Properties	33%	38%	18%	10%	39
OPDR/SHPO	State Tax Credit for Historic Properties	38%	38%	16%	5%	37
RS	Regional Solutions (program)	21%	46%	18%	14%	99

Perceptions of Policies Beneficial to Housing Production

The survey asked respondents to provide open-ended written comments to the following question.

> **If you could pick one existing state statute, policy, or program that you think is most beneficial to housing production, which one would you pick and why?**

This section summarizes the key themes that emerged from the written comments.

1. **Middle Housing Reforms (HB 2001, statewide middle housing requirements, ADUs, duplex/triplex/quadplex allowances, cottage clusters, elimination of single-family zoning, HB 458 middle housing land division, "upzoning")****
   Count: \~145 mentions

Respondents overwhelmingly view HB 2001/middle housing policy as the single most consequential housing production reform in Oregon because:

- Opens previously exclusionary single-family areas to more attainable housing types.
- Reduces political barriers at the local level (NIMBY resistance, appeals, discretionary review).
- Enables small-scale developers, nonprofit builders, and homeowners to add units.
- Helps "missing middle" households who don't qualify for subsidies but can't afford high-cost housing.
- Expands supply without requiring major new infrastructure.
- Creates more predictable approval pathways → projects "actually pencil."

2. **LIFT (Low-Income Housing State Funding) – Includes LIFT Rental + LIFT Homeownership**
   Count: ~75 mentions

Respondents consistently describe LIFT as:

- The only adequately sized public funding source to make affordable housing construction feasible.
- Flexible enough to pair with LIHTC, bonds, OAHTC, or bank loans.
- Covers predevelopment + sitework, making projects financeable.
- Essential for nonprofit and rural builders who cannot rely on the private market.
- Faster and more predictable than some other OHCS funding streams.

3. **Infrastructure Funding (SPWF, IFA, CWSRF, HISF, Business Oregon, OneStop, etc.)**
   Count: ~58 mentions

Infrastructure is repeatedly identified as the primary bottleneck behind housing production because:

- Many jurisdictions (especially rural) lack sewer/water capacity.
- Developers cannot shoulder million-dollar infrastructure burdens.
- Funding opens large development areas immediately.
- Infrastructure grants allow cities to lower SDCs.

- Unlocks “development-ready land” that otherwise sits idle.

4. **Building Codes / Uniform State Building Code System**
   Count: ~40 mentions

Respondents value the statewide code because:

- It is predictable and consistent for contractors and builders.
- Provides safety while avoiding local code fragmentation.
- Eliminates costly resubmittals caused by inconsistent local interpretations.
- Permit-ready plans save time and cost, especially for small homeowners.

5. **Clear and Objective Standards (ORS 197.307, 197A.400, HB 2138)**
   Count: ~28 mentions

Respondents see clear and objective housing review as:

- A major improvement to predictability.
- A guardrail against discretionary, subjective denials.
- A tool to reduce permitting timelines.
- Essential for “getting to yes” on housing.

HB 2138 mentions include:

- Concurrent review of subdivisions + middle housing land divisions
- Removal of Homeowner Association (HOA) ADU prohibitions

6. **LIHTC (Federal Low-Income Housing Tax Credit)**
   Count: ~24 mentions

Although not a state-created program, respondents still listed it because:

- It is the **core financing tool** for almost all large affordable housing projects.
- Nearly every affordable project requires LIHTC to pencil.
- Enables deep affordability when paired with state gap funding.

7. **SB 1537 (Housing Accountability and Production Office + UGB expansion path + parking flexibility)**
   Count: ~20 mentions

What respondents value most:

- Provides new UGB expansion options tied to housing.
- Creates HAPO to challenge local barriers.
- Offers parking requirement flexibility crucial for infill.
- Reduces appeal risk for affordable housing.

8. **ADUs (when mentioned independently of middle housing)**
   Count: ~18 mentions

Note: Many ADU mentions are included in middle housing totals above.

- Quick to build.
- Lower-cost.
- Flexible for multigenerational living or rental income.
- Powerful for incremental production.

9. UGB Expansion generally (outside SB 1537)

Count: ~12 mentions

- Believed to unlock developable land.
- Needed for market-rate builders in high-demand areas.

10. OHCS Funding Programs aside from LIFT or LIHTC (general)

Count: ~10 mentions

- State subsidies are necessary for extremely low-income housing.
- PSH funding especially valuable for vulnerable households.

Perceptions of Policies Detrimental to Housing Production

The survey asked respondents to provide open-ended written comments to the following question.

> **If you could pick one existing state statute, policy, or program that you think is most detrimental to housing production, which one would you pick and why?**

This section summarizes the key themes that emerged from the written comments.

1) Urban Growth Boundaries (UGB) & Land Supply Constraints

Count: ~50 comments

The most frequently cited issue. Respondents consistently argue that UGBs:

- Artificially limit buildable land supply
- Drive up land costs
- Require long, complex, and litigation-prone expansion processes
- Fail to respond quickly to market demand

Many noted that even when expansions are justified, timelines of years and regulatory hurdles make them ineffective. Some also highlighted conflicts with farmland preservation rules and lack of flexibility.

2) Wetlands & Environmental Regulations

Count: ~35 comments

Wetlands regulations were described as:

- Overly restrictive, redundant (beyond federal rules), and inconsistent
- Expensive due to mitigation, studies, and permitting
- Slow, unpredictable, and sometimes unclear

Respondents emphasized that wetlands policy often:

- Makes otherwise usable land undevelopable
- Adds major costs (e.g., mitigation fees, delays)
- Prioritizes low-value wetlands over housing needs

3) Permitting, Land Use Processes & Regulatory Complexity

Count: ~30 comments

A major theme across comments was process inefficiency and complexity, including:

- Lengthy and unpredictable permitting timelines
- Fragmented approvals across agencies (DLCD, DEQ, DSL, etc.)
- Constant rule changes creating confusion

- Local and state rules layering on top of each other

Many respondents described the system as:

- "Overly bureaucratic," "cumbersome," and "uncertain"
- Increasing risk and deterring development

4) System Development Charges (SDCs), Fees & Taxes

Count: ~25 comments

SDCs and development-related fees were frequently cited as:

- Adding tens of thousands of dollars per unit
- Often disproportionate to actual infrastructure impacts
- A major barrier to smaller projects and "missing middle" housing

Several respondents linked high SDCs to:

- Property tax limitations (Measures 5 & 50)
- Lack of alternative infrastructure funding mechanisms

5) Prevailing Wage (BOLI) Requirements

Count: ~25 comments

Prevailing wage laws were strongly criticized for:

- Increasing construction costs by ~20% or more
- Adding administrative complexity and uncertainty
- Discouraging public-private partnerships

Respondents noted that these rules:

- Particularly affects affordable and mixed-use housing
- Make many projects financially infeasible

6) Building Codes & Energy Efficiency Requirements

Count: ~20 comments

Respondents highlighted:

- Increasingly stringent energy codes
- Building code requirements not aligned with affordability goals

Common concerns:

- Rising construction costs with limited perceived benefit
- Requirements moving faster than technology or market capacity
- Misalignment with "middle housing" and small-scale development

7) Infrastructure Funding Gaps

Count: ~20 comments

A major structural issue identified was:

- Lack of funding for infrastructure (sewer, water, roads)

Impacts include:

- Developers bearing high upfront costs
- Infill and expansion areas lacking readiness
- Projects not “penciling out” financially

Many respondents emphasized: “We don’t need more policies—we need infrastructure funding.”

8) State Programs & Administrative Complexity (OHCS, ORCA, OHNA, DLCD)

Count: ~25 comments

State housing programs were often described as:

- Overly complex, prescriptive, and inefficient
- Creating long waitlists, uncertainty, and high predevelopment risk
- Diverting local staff time into compliance rather than production

Specific criticisms included:

- ORCA funding delays and cost inefficiencies
- OHNA planning requirements without clear production impact
- DLCD bureaucracy and outdated approaches

9) Zoning Restrictions & Land Use Regulations (General)

Count: ~20 comments

Beyond UGBs, broader zoning issues included:

- Restrictions on density and land use flexibility
- Limits on rural land development
- Difficulty rezoning or adapting land to housing

Respondents argued zoning often:

- Prevents efficient land use
- Prioritizes non-housing uses over housing need

10) Workforce, Licensing & Construction Constraints

Count: ~12 comments

Several comments cited:

- Trade licensing requirements limiting labor supply
- High labor costs and slow certification processes
- Regulatory barriers for contractors and inspectors

These contribute to:

- Construction delays
- Higher overall project costs

11) Appeals, NIMBYism & Legal Delays (e.g., LUBA)

Count: ~10 comments

Respondents noted that:

- Appeals processes allow projects to be delayed for months/years
- Small groups or individuals can block development
- Legal uncertainty increases risk and cost

Summary of Open-Ended Comments

The survey asked respondents to provide open-ended written comments to the following question:

Is there anything else you would like to add related to housing production in Oregon?

A total of 211 respondents provided comments in response to this question. Following is a summary of the key themes.

Cost and Affordability

Respondents consistently emphasized that the core issue is not just housing supply, but the high and rising cost of housing production and ownership. Comments pointed to escalating land prices, construction costs (materials, labor, energy codes), and interest rates, all of which make projects infeasible and housing unaffordable for middle- and lower-income households. Many noted that even relatively high-income households struggle to buy homes, signaling a systemic affordability breakdown. There is also concern that subsidies and “affordable housing” programs often miss middle-income households or fail to deliver truly affordable units.

Excessive Regulation and Complexity

A dominant theme was that Oregon’s housing system is overregulated, fragmented, and constantly changing, creating confusion and delays. Respondents described a “death by a thousand cuts” dynamic where layered regulations—state, regional, and local—accumulate costs and uncertainty. Frequent legislative changes, overlapping mandates, and inconsistent interpretations across jurisdictions make it difficult for developers and local governments to keep up. Many argued for simplification, standardization, and a pause in new rulemaking to allow existing policies to take effect.

Land Supply Constraints and Urban Growth Boundaries

Many respondents highlighted limited buildable land—particularly due to UGB constraints—as a structural barrier. They argued that insufficient land supply, combined with lengthy expansion processes, drives up land costs and limits housing production. Some called for more flexibility in UGB expansion or better utilization of land within existing boundaries, while others emphasized that environmental and land-use protections must be balanced with housing needs.

Infrastructure Funding Gaps

A major recurring issue is the lack of funding for infrastructure (water, sewer, roads, utilities) needed to support new housing. Respondents repeatedly noted that even when land is available, projects cannot proceed because infrastructure costs are too high and often fall on developers via SDCs and fees. Many advocated for state investment, alternative financing mechanisms (bonds, tax tools), and shared public responsibility for infrastructure to unlock housing development.

Permitting Delays and Process Inefficiencies

Respondents described slow, inconsistent, and unpredictable permitting processes as a key barrier. Long timelines, conservative code interpretations, and inter-agency coordination issues can delay projects for years. Examples included lengthy environmental reviews, unclear requirements, and repeated redesigns. Many called for faster reviews, guaranteed timelines, clearer standards, and more streamlined coordination between agencies.

Financing and Capital Constraints

Beyond costs, respondents stressed that access to capital and financing structures is a critical bottleneck. Projects often require complex “stacked” funding sources that are poorly aligned in timing and requirements. Smaller developers and community-based organizations are especially disadvantaged. Suggestions included better coordination of funding programs, expanded loan options, and mechanisms to reduce risk and waiting periods for developers.

Mismatch Between Policy and Market Realities

Several comments highlighted a disconnect between policy goals and real-world feasibility. Respondents noted that policies often assume housing will be built if allowed but ignore financial constraints and market behavior. Developers build what is profitable, and regulatory changes alone do not guarantee production—especially for lower-cost housing. Many called for policies that better align with economic realities and incentivize desired outcomes.

Need for Broader Economic and Workforce Support

Some respondents expanded the issue beyond housing, arguing that economic conditions—jobs, wages, labor availability—are fundamental drivers. Housing production depends on population growth, workforce capacity, and a healthy construction sector. Labor shortages (especially skilled trades) and broader economic challenges were cited as limiting factors alongside policy barriers.

Equity and Targeting Challenges

Respondents noted that current approaches often fail to serve key groups, particularly middle-income households ("missing middle") and rural communities. Some argued that funding and programs disproportionately benefit large developers or specific project types, while others highlighted inequities in access to resources, technical capacity, and program eligibility.

Desire for Simplicity, Flexibility, and Coordination

Across responses, there was a strong desire for a more coordinated, streamlined, and flexible system. Suggestions included better alignment across agencies, standardized rules, clearer guidance, and reduced bureaucracy. Many emphasized that improving coordination—between funding, permitting, and policy frameworks—would significantly accelerate housing production.

Focus Groups

The following section describes the approach and outcomes of 12 virtual focus groups, and subsequent follow-up. The research team, with the support of Mosaic Resolutions LLC, facilitated focus groups between April 10th, 2026 and May 8th, 2026.

Methods

IPRE and Mosaic Resolutions created the focus group approach and facilitation guides in collaboration with the Housing Accountability and Production Office (HAPO). Focus group topics were designed based on the outcomes of the multi-party survey and in consultation with HAPO . The Governor's Office reviewed focus group topics and approach for further refinement. The focus groups were as follows:

Focus Group Topic	# of Focus Groups	Targeted Audience
Affordable housing funding programs and application procedures	2	Affordable housing developers; Cross-sector
Building codes and technical assistance	1	Cross-sector
Historic preservation and archaeological permitting (e.g. SHPO consultation and permitting processes)	1	Cross-sector
Infrastructure gaps and funding programs	2	Developers; Cross-sector
Land availability (e.g. Goal 14 and UGB statutes)	1	Cross-sector
Land use planning requirements and technical assistance	3	Large cities; Small cities; Developers
Redevelopment opportunities	1	Cross-sector
Wetland Regulations and incentives	1	Cross-sector

The key objectives of the focus groups were to:

- Provide for in-depth exploration of shared experiences, challenges, and potential solutions for housing production in Oregon
- Gain deeper insights and explore the nuances of programs and policy implementation related to housing.
- Gather stories and examples of barriers and solutions to housing production.
- Identify actionable changes and possible pathways for implementation.

The research team drafted 1- to 2-page background documents to support focus group engagement. These documents included high-level summaries of relevant agencies, statutory purpose, lists of relevant programs, recent or upcoming legislative or statutory changes, and a summary of focus group questions. These materials were reviewed and vetted by HAPO and members of the study's State Agency Work Group. The research team provided these materials to participants 1-3 days in advance of the focus group.

Where possible, recruitment considered sector, city size, and geographic location to provide balanced discussions in all-sector focus groups which resulted some participants being solicited to participate in more than one discussion.

Each focus group was asked a set of guiding questions tailored to the specific topic and audience, as summarized in the following table.

Focus Group Topic	Guiding Questions
Affordable housing funding programs and application procedures	What's working well about the state's affordable housing program? How do funding conditions and application processes create barriers to housing production? What would make it easier to apply for or access funding? Can you share an example or story of how the funding program inhibited or helped the ability to produce affordable housing? What do you see as the most helpful thing that state agencies could do to support the provision of affordable housing?
Building codes and technical assistance	What do you see as the benefits related to housing of having a statewide building code? Can you share an example or story of how requirements within the building code helped or inhibited housing production? Can you share an example or story of how technical assistance or tools related to statewide building codes helped or inhibited housing production? What do you see as the most helpful thing that state agencies could do to make compliance with building codes less of a barrier to housing production?
Historic preservation and archaeological permitting (e.g. SHPO consultation and permitting processes)	What do you see as the value of Oregon's efforts to protect historic, cultural, and archeological resources, as it relates to housing? Can you share an example or story of going through the SHPO Consultation process, and how it helped or hindered housing production? Can you share an example or story of going through the archaeological permitting process and how it helped or hindered housing production? What do you see as the most helpful thing that state agencies could do to make SHPO consultation or archaeological permitting clearer and easier to navigate in support of housing production?

Focus Group Topic	Guiding Questions
Infrastructure gaps and funding programs	How can infrastructure financing be better used or aligned to unlock housing supply? How do infrastructure gaps create barriers to housing production? Can you share an example/story of how infrastructure funding inhibited or helped housing production? What types of infrastructure are the biggest issue for housing production? How could the state better support provision of infrastructure?
Land availability (e.g. Goal 14 and UGB statutes)	What UGB-related processes or requirements are working well? Can you share an example or story of how UGB regulations inhibited housing production? What technical assistance resources related to UGB regulations or making land available have you used? What experience do you have with sale or exchange of state-owned lands for housing production? What do you see as the most helpful thing that state agencies could do to make UGB regulations and land availability programs less of a barrier to housing?
Land use planning requirements and technical assistance	What do you see as the benefits related to housing of having state-level land use planning requirements and technical assistance? How do state-level land use planning requirements and technical/financial assistance create barriers to housing production? Can you describe an example of how a regulation, requirement, or technical assistance program inhibited or helped housing production? What improvements to the implementation of land use regulations or technical assistance programs would support housing production?

Focus Group Topic	Guiding Questions
Redevelopment opportunities	What is working well in the state's efforts to spur and provide assistance for redevelopment? Can you share an example or story of a brownfields redevelopment project, and how state regulations or requirements played a role? Can you share an example or story of a conversion, redevelopment, or infill project, and how state regulations or requirements played a role? How could the state better support redevelopment? What do you see as the most helpful thing that state agencies could do to reduce barriers and make it easier to redevelop properties?
Wetland Regulations and incentives	What wetland processes or requirements are working well? What regulations or technical assistance resources related to wetlands do you have experience with? Can you share an example or story of how wetland regulations or technical assistance has inhibited or helped housing production? What do you see as the most helpful thing that state agencies could do related to wetland regulations or technical assistance to support the housing production?

The following questions were posed to all focus groups through a zoom polling function:

1. What state policies or programs are holding Oregon back from more housing production?
2. Where should the state prioritize funding in order to boost housing production?
3. What state-level financial or technical support would most benefit housing production and why?

Recruitment

Potential focus group participants were recruited by email through the following pathways:

- Individuals who participated in the multi-party survey and noted interest in participating in other engagement activities;
- Individuals who completed an interest form, available on the project information 2-pager and on HAPO's website;
- Other partners or individuals identified by HAPO from other related engagement or initiatives; and
- Snowball sample – individuals receiving a recruitment email were encouraged to forward the opportunities to others directly or post via their professional networks.

Interested individuals were prompted to complete a recruitment form which was open from 3/13/2026 – 4/3/2026. The form solicited 182 responses. All interested parties were invited to participate in one or more focus groups and provided an opportunity to provide input via a follow-up form (either in addition or instead of attending).

Focus Group Participant Summary

A total of 109 unique individuals engaged in focus group discussions. The following table provides a more detailed breakdown of focus group participants by sector. A total of nine individuals participated in more than one focus group. Note that sector is self-reported by participants.

Unique Participants by Sector	Count of Unique Participants	Percent of Total
Nonprofit	22	21%
Private	31	29%
Public	52	49%
Other (e.g. trade organizations)	4	4%
Total	109	

- **Public sector participants included** local government staff representing land use, community development, building inspectors/plans examiners, public works/engineering, city administration, economic development, city attorney, historic resources/historic preservation, housing, transportation, policy, water resources, floodplain management, and city advocacy organizations
- **Private sector participants** included private housing developers, surveyors, real estate, planning, investment, architect, engineering, land management, and legal counsel.
- **Nonprofit participants** included nonprofit housing developers and housing advocacy organizations.
- **Other participants** included trade organizations.

Focus group participants represented all geographic regions from across the state. The table below provides a breakdown of participant regions using DLCD regions. Participants were able to choose more than one option; Twenty-one participants serve two or more regions.

Count of region / total number of participants	Count of choices	Count of Choices/total unique number of individuals
Statewide	28	26%
Portland Metro	41	38%
Central Oregon	15	14%
Eastern Oregon	4	4%
Mid-Willamette	19	18%
North Coast and Lower Columbia	10	9%
South-Willamette	14	13%
South Coast	4	4%
Southern Oregon	3	3%

A follow-up form was provided to all individuals who participated in focus groups or completed the interest form and could not attend. The form provided open-ended response boxes that corresponded to the guiding questions provided to each focus group and an option to provide overall comments.

A total of 23 responses were provided to the follow-up form which comprised 18 individuals who participated in focus groups and five new individuals.

Focus Group Summaries

The following sections include a snapshot of participants by sector followed by a high-level summary of the focus group discussion.

Land Use Planning and Technical Assistance

Focus Group – Date/Topic/Audience	Nonprofit Sector	Private Sector	Public Sector	Other	Grand Total
4/10 - land use (cities over 10K)		1	14		15
4/24 - land use (cities under 10K)			5		5
4/29 - land use (developers)		4			4
Grand Total		5	19		24

Benefits/What's working well

Overall, focus group participants discussed the benefits of Oregon's land use system as a consistent framework for growth and development planning that provides a minimum standard that prevents harm or inconsistent local practices and encourages long-term planning. Other benefits discussed included limited appeal windows and timelines that can reduce the risk of extended litigation (in some cases).

When done well, participants perceive that rulemaking processes translate statutory goals into implementable rules. Middle housing rulemaking was cited as an example of a strong model of effective implementation.

Participants also discussed the benefits of DLCD’s technical assistance programs, noting DLCD technical assistance grants, DLCD regional representatives, and state support for procurement as particularly valuable for reducing administrative burden. These programs were emphasized by small cities as programs they rely upon. Participants also noted improvements in application processes which made it easier to access technical assistance grants.

Focus group participants discussed how state mandates can unlock change specifically referencing legislation for middle housing and ADU allowances. The allowance of duplexes and ADUs by right simplified processes and increased flexibility at the local level. Participants also discussed how state mandates can help overcome local political barriers or resistance that might otherwise block adoption. Other beneficial recent changes discussed included clear and objective review, the reduction of discretionary hearings and housing targets.

Challenges

All three focus groups on land use planning and technical assistance cited **the pace, detail, and interpretation of recent legislation as a challenge.** The pace of legislative change comes with an administrative burden for local jurisdictions, requiring them to track updates, revise code, and adopt changes. Some participants felt the time spent complying with mandates detracted from their ability to pursue proactive housing strategies.

Participants noted that the detail related to implementation in recent legislation was overly prescriptive, challenging to adapt to local conditions, and resulted in more complex development code that is harder for developers to navigate. Conversely, vague or contradictory statutory language, combined with differing interpretations among state agencies, legal counsel, and courts, has also led to uncertainty, delays, and increased risk of litigation for local governments. Some participants felt that communication from the state was inconsistent, with limited guidance or unclear expectations regarding rule changes and noted they could not find a centralized location to find the most up to date information.

While state mandates were noted as a benefit for overcoming local barriers to change, in some cases this can also trigger local backlash and compound into staff turnover.

Challenges also arise from the structure of the land use system itself. Participants discussed the lack of a clear hierarchy or decision-making framework for resolving conflicts between land use goals and the overemphasis on housing at the expense of other goals such as those that pertain to commercial land, farm and forest land, and environmental resource protection. Participants cautioned that the focus on housing comes with a risk of creating unbalanced and less functional communities. Participants noted that some local comprehensive plans were outdated or incomplete. Participants noted the lack of requirement for some jurisdictions to complete regular plan updates, which can lead to misalignment between plans and current needs.

Participants also perceive the land use system to be overly focused on process than outcomes. They noted excessive procedural steps, redundant approvals, and timing of public processes leading to increased timelines for development and increased risk of litigation.

Regulatory complexity also creates conflicting or duplicative requirements for developments navigating state agency programs and processes. Participants discussed examples of mismatch between state programs and local realities when there are required elements irrelevant to local conditions. They also noted examples of projects being detailed by detailed or extensive analysis requirements. Some participants were unclear whether recent policy changes were having a measurable impact on housing and identified the limited data available to demonstrate their efficacy.

Lastly, many participants in land use planning and technical assistance focus groups cited infrastructure as a significant barrier to housing production pointing to insufficient funding for transportation, water, and sewer systems, constraints on local revenue, and aging infrastructure systems. Even when zoning or land use requirements may allow for housing, a lack of infrastructure capacity can prevent projects from moving forward. State mandates often require additional housing without ensuring that adequate infrastructure is in place to support growth.

Possible Solutions

Participants identified the following as possible solutions related to land use and technical assistance to increase housing production:

- Slow the pace of new laws and requirements. Future legislative sessions should focus on refining existing policy, cleaning up inconsistencies, and addressing gaps.
- Measure the effects of recent laws before adopting new legislation.
- Define a hierarchy between land use goals to resolve conflicts that arise and guide local governments through decision-making.
- Increase clarity and consistency in ORS and OAR. Where possible, simplify requirements and align language to allow for consistent interpretation across state agencies.
- Communicate and maintain a model code of minimum standards (rather than aspirational standards) to reduce administrative burden and clarify targets, especially for smaller cities.
- Require updates of outdated city or county comprehensive plans.
- Address inconsistencies of middle housing definitions between land use and building codes.
- Revise requirements for public input to maximum meaningful input and minimize unnecessary delays.
- Apply updated state requirements without requiring a full local adoption process.
- Align housing requirements with infrastructure capacity.
- Streamline procurement processes
- Track and communicate the outcomes of housing policies to allow for evidence-based policy refinement

- Increase the flexibility of funds where requirements are complex or onerous (ex. MIRL)
- Prioritize funding for the projects with the highest feasibility
- Provide technical and financial resources to support the update of outdated comprehensive plans
- Compile and communicate clear implementation timelines
- Publish regular digest summaries and new laws
- Share updates through multiple channels
- Offer legally reliable interpretations
- Build on the DLCD regional representative model to implement a more pro-active approach to technical assistance
- Improve alignment and coordination across state agencies, specifically DLCD, DEQ, ODOT, OHCS

Land Availability

Focus Group – Date/Topic/Audience	Nonprofit Sector	Private Sector	Public Sector	Other	Grand Total
4/17 - Land availability (all sectors)	3	6	2	2	13

Benefits/What's Working

Participants discussed the benefits of Urban Growth Boundaries (UGB) policies as achieving their original intent of conservation and the resulting protection of farm and forest lands. They also noted that UGBs can encourage more compact and contiguous development, promote infill, and encourage efficient land use.

Participants found that the state's role in land availability provides an important to local counterbalance to no-growth pressures. Newer tools and initiatives, such as bypassing strict prioritization rules, focusing on development-ready land, and new funding resources, seem promising, but may feel that it is too soon to see evidence of successful implementation.

Challenges

Participants discussed UGB expansion processes as complex, bureaucratic, and litigious. Extensive requirements and frequent appeals cause lengthy delays, increased costs, and discourage jurisdictions from pursuing expansions at all. Some participants shared experiences of expansion process timelines ranging from 10-20 years, which led to land supply falling behind demand. Small jurisdictions face disproportionate burdens to implement UGB expansion processes from lack of local resources or capacity. Some participants shared that current UGB policies and processes limited local jurisdictions on the ability to plan for desired or aspirational growth.

Participants felt that housing capacity calculations artificially constrain land supply through overestimating infill capacity and failure to account for real-world development timing. Participants found that properties counted towards infill capacity are often constrained by infrastructure needs and do not account for property ownership. Properties that are counted as immediate capacity may take 10 or more years to develop or may never develop at all. Housing need calculations may also be skewed from reliance on population projections.

Participants found that prioritization rules limit practical development. These rules can make it challenging to assemble land into buildable sites and do not account for property owner willingness.

Using small expansions provided by recent one-time expansion bills were not seen as beneficial because small or fragmented expansions can compound infrastructure costs and further limit economies of scale and increase cost per unit.

The complexity of existing tools for UGB expansion has been too difficult for participants to use. They cited specific requirements from SB 1537 and HB 4035 as having arbitrary land size thresholds and excluding cities where low-income households are already priced out of the market. Other requirements have created confusion about urban reserve and non-resource land. Small cities have been excluded from accessing these pathways because they require housing needs analysis to be in place, which many small cities are not required to complete regularly like cities over 10,000.

Possible Solutions

Participants identified the following related to land availability as possible solutions to increase housing production:

- Streamline UGB expansion process and requirements through simplifying requirements and allowing for larger amounts of land to be brought in per expansion.
- Modernize planning for UGBs by updating to a 30-year supply to account for delays.
- Update land identification requirements to select land that is buildable and served by infrastructure.
- Allow for communities to add up to 20% more acreage than they are required to based on OHNA projections.
- Relax prioritization rules to allow more flexibility in land selection.
- Define infill and how to accurately compute it; adjust infill capacity calculations to account for development barriers and low likelihood of development.
- Refine SB 1537 one-time expansion tools by removing aspects (rather than adding new legislation) including removal of arbitrary acreage caps, broadening eligibility, eliminating restriction criteria (ex. prior expansions)
- Expand use of land swaps and exchanges to replace low-quality land with higher-value development-ready land
- Reduce appeals and litigation by limitations on who can appeal decisions and the scope of what is appealable.
- Allow for less detailed studies to justify a generous amount of land, and protect jurisdictions from appeals if they are "in the ballpark"
- Address small city land needs under Goal 14
- Encourage interagency collaboration to review UGB expansion potential on a regional level, possibly leveraging Regional Solutions as a resource to address infrastructure capacity.
- Evaluate or re-draw UGBs with current GIS capabilities

Infrastructure

Focus Group – Date/Topic/Audience	Nonprofit Sector	Private Sector	Public Sector	Other	Grand Total
4/10- Infrastructure (developers)	4	5			9
5/8 - Infrastructure (cross sector)	1	1	9	1	12
Grand Total	5	6	9	1	21

Benefits/What's working well

Participants widely agreed that when infrastructure funding is available, it has huge potential for unlocking buildable land for housing production. Even modest investments (~10K per site) can result in maximizing housing outcomes. Participants cited examples of where prior infrastructure investments have yielded results for housing such as increasing the feasibility of infill and collector and arterial level streets enabling the development of local streets and subdivisions.

Participants specifically noted the following programs are effective when they are accessible:

- Housing Infrastructure Support Fund and Housing Infrastructure Financing Program to support key infrastructure development (Business Oregon)
- General Housing Account Program (GHAP) to fund infrastructure connectivity, especially helpful for manufactured home communities (OHCS)

Participants noted that GHAP works particularly well because it functions as a grant rather than a revolving loan and reduces their capital cost burden. They shared general enthusiasm in anticipation of additional funds that will be made available from OHCS through the Price Act to fund infrastructure upgrades. Participants noted that they have used other state revolving loan funds and federal funds to enable critical infrastructure such as sewer expansions and lift stations.

Cities have found creative solutions at the local level to fund infrastructure and reduce financial risk. Some cities have implemented programs to cover infrastructure costs up front to developers and allow repayment over time. In some cases, cities have participated in cost-sharing to move projects forward when multiple infrastructure elements are aligned. Others identified public-private partnerships have structures that enable this type of collaboration between cities and developers.

Challenges

Participants underlined that there is **not enough infrastructure funding to meet current needs**. Major infrastructure such as arterial roads, sewer expansions, and water systems come at a high cost and are often the cited as the limiting factor when it comes to enabling housing production.

Participants shared that land use planning is misaligned or absent of an infrastructure funding strategy. Project by project infrastructure results in fragmented or incomplete systems. Some participants felt that the focus solely on housing production detracted from the need to build whole communities where housing is built alongside transportation, parks, utilities, and services.

Cities are limited in terms of the tools they can utilize for financing infrastructure. Cities lack pre-loaded infrastructure capacity and rely heavily on state or federal loans which can result in long-term debt burdens. Slow or uncertain development can make loan repayments difficult. Other tools, like system development charges (SDC) can act as a tax on development, lowering development feasibility when SDCs are high. Restrictions on eligible uses and 10-year expiration on SDC credits leave cities with challenging trade-offs.

Participants shared opinions that cities are overly reliant on private sector funding for infrastructure. Smaller developments can be rendered unfeasible from inability to absorb the costs of infrastructure. For development sector participants, the requirements related to infrastructure may not become clear until late in the process and lead to high contingencies that reduce project scope or abandonment.

Public sector participants shared that accessing infrastructure funding at the state level was exceedingly complex. Often, cities are piecing together infrastructure from multiple state funding programs. Participants noted the administrative burden of navigating different rules, requirements, and application processes to access funds, particularly for small and rural cities. Some participants identified specific aspects of program design that make them challenging to access, including:

- Complex applications and requirements
- Heavy reporting and compliance burdens
- Lack of guidance or support
- Misalignment of requirements with local needs or conditions
- Limited benefit relative to administrative burden

Other participants shared that they had limited knowledge of what programs existed or how to access them at all.

Infrastructure is subject to long development timelines resulting from permitting. Participants noted delay caused by navigating permitting that required multi-agency reviews (ODOT, DLCD, DSL, and others), which at times can create conflicting requirements or guidance from different agencies. Participants noted specific challenges with navigating wetland and environmental permitting from lack of mitigation options and changing standards.

Participants discussed the variability in infrastructure challenges for different geographies across the state. These included:

- Greenfield/UGB expansions areas: no existing infrastructure, high cost, land assembly challenges
- Infill areas: aging infrastructure with limited capacity, expensive retrofits and upgrades
- Rural and coastal areas: limited by topography (steep terrain, coastline, wetlands), limited scale of development to absorb the costs, higher per-unit infrastructure costs

Participants emphasized that flexible solutions were needed to make meaningful strides, including solutions that could be tailored to local conditions.

Lastly, some participants noted other policy barriers to infrastructure within transportation planning rules (TPR) that limit road expansion (Rule 830) and lower feasibility of housing development.

Possible solutions

Participants identified the following related infrastructure as possible solutions to increase housing production:

- Increase the state's role in infrastructure financing through flexible competitive grants that drive local solutions, larger scale funding, patient capital, revolving loans with better terms
- Align infrastructure planning with land use planning
- Increase funding for infrastructure planning to help identify development pathways and reduce risk before investing
- Enable alternative funding approaches such as bridge financing, more flexible SDC structures, local improvement districts, and value capture mechanisms
- Limit or streamline appeals process through restricting appeals on state-funded infrastructure projects, reducing appeals timelines, and limitations on duplicative appeals
- Reform TPR related to VMT policies where they limit feasibility
- Prioritize infrastructure investments for projects with highest feasibility (quick wins) and areas of highest growth (long-term impact)
- Allow more flexibility in program design such as eligible uses that allow for a broader set of infrastructure (ex. traffic calming) or allowing developers to access funding directly
- Address full community infrastructure needs (beyond just housing) including transportation, utilities, parks and recreation, and non-auto infrastructure
- Create a one-stop funding pipeline to increase access to eligible entities and improve coordination across agencies.
- Invest in local capacity and technical assistance with grant writing support, planning assistance, and dedicated technical advisors that perform a "navigator" role
- Enhance public-private partnership tools such as cost-sharing agreements

Affordable Housing Funding and Application Procedures

	Nonprofit Sector	Private Sector	Public Sector	Other	Grand Total
4/13 - Affordable (all)	1	2	6		9
4/24 - Affordable (affordable devs)	6	6			12
Grand Total	7	8	6		21

Benefits/What's Working

Participants identified the Oregon Centralized Application (ORCA) as a positive step forward in providing a single-entry point for affordable rental housing development funding programs. Participants noted that ORCA creates a more structured pipeline and application process, is clear on program rules, underwriting standards, and eligibility criteria, and improves some aspects of predictability compared to past Notice of Funding Availability (NOFA) system. Participants also found staff to be accessible and responsive to requests.

Participants agreed that state funding is essential to making affordable housing projects feasible. Recent state investments in affordable rental housing development have created significant developer interest and competition resulting in a broader pipeline of projects and new market entrants. Participants also found that homeownership programs are well-funded and producing units at scale.

Participants have found that recent program changes that have expanded eligibility and increased the pool of possible projects. Programmatic changes mentioned included flexibility on location (e.g. distance from transit) and expansion of eligible project types. Participants discussed perceptions that these changes have been more responsive to the realities of site availability and market conditions. Additionally, participants felt that programmatic design that emphasizes performance and quality have improved long-term project viability and the operating stability of projects.

Focus group participants have found that interagency coordination, when it occurs, works to solve issues quickly and can cut down time significantly on asynchronous administrative coordination. One individual provided an example of a one-hour meetings bringing all relevant parties to the table as key in expediating timelines and clarifying requirements. Participants also discussed that HAPO has been seen as helpful resource for coordination at the local level, including actions such as advising local jurisdictions and supporting coordination that unblocks stalled projects.

Challenges

The following sections are organized by key discussion topics including the ORCA Process, Program Feedback, and Policy Goals and Administrative Feedback.

<u>ORCA Process</u>

While participants see ORCA as a step in the right direction to centralize and streamline the application process, they also discussed how improvements to the waitlist/queueing function, impact assessment requirements, and financial eligibility steps could be made to better fit development realities and meet housing production goals. Overall, participants desire changes that would address increased predictability in funding including issues around timing, requirements, and prioritization.

Participants shared experiences of how long and uncertain waitlist timelines have made it difficult to sustain funding. A snapshot of examples included:

- Investors or lenders losing confidence and land transactions fall through while waiting in the queue.
- Mismatch of financial institution timelines with the queue process requiring developers to renegotiate funding commitments.
- Missed opportunity to leverage federal and local dollars waiting on state fund commitments and resulting in increased need for funding backfill from state dollars.

Other participants discussed how unknown waitlist timelines and funding tied to legislative biennia have led to some developers planning on longer time horizons, which they noted would be challenging for small developers without the same scale of capital access.

Material changes can move projects out of the queue and require applicants to resubmit. A participant described an example of finding a means to increase the number of units during pre-development that would have required the applicant to submit a material change to their application. The participant described disagreement with OHCS staff on what constituted the difference between a small and large material change. The participant described ultimately choosing not to make the design changes to delivering more units to keep their application within the queue.

Applicants may be able to view their position in the queue and feel some level of confidence that their project will get funded eventually. However, participants noted the trade off in funding commitment timelines from the old NOFA process which provided more certainty.

Participants discussed barriers to accessing information on how projects are ranked, graded, or prioritized in the queue. One participant shared an experience of location prioritization changing when they were "up next" and then losing their position in line when the geographic focus of the funding program shifted. Other participants noted how some criteria seemed arbitrary or too detailed to honestly answer in early development phases (ex. eco-friendly paint) and were unclear in how some criteria was being operationalized. Focus group participants worried that some applicants may be providing information disingenuously to advantage their applications because accountability to those options were weakly enforced in later stages of development. Specific examples of criteria included "environmental tiebreakers" and "cultural responsiveness".

Many focus group participants felt that aspects of the ORCA process do not align with development realities. This included what participants saw as a lack of flexibility on design details and financial proformas in earlier stages of the application process that lock in projects and limit incentives that encourage more production or efficient use of funds. One participant described being penalized for cost-savings during the financial feasibility stage with a reduced LIFT allocation they felt ran counter to housing goals and created a perverse incentive. Other participants expressed frustration that projects of low feasibility sit in the same queue as high feasibility projects and that requirements during the impact assessment stage do not reflect actual readiness.

Program Feedback

Focus group participants described what they saw as misalignment or inefficiencies in program design that created fewer units than is possible. Examples included:

- Subsidy caps that prevent optimal project scale, force smaller projects, or do not reflect cost realities of desired building types (mixed-use) or geography.
- Requirements that reduce unit count to fit funding limits when developers can reach better cost efficiencies at slightly higher unit counts.
- Weak cost controls or benchmarking resulting in extremely high per unit costs (~900K/unit) that disincentivize developers from finding efficiencies.

Participants provided more specific feedback on the programs they had familiarity as detailed below.

Moderate Income Revolving Loan (MIRL)

- The administrative complexity of the program is burdensome for small, rural jurisdictions with limited staff.
- Cities are required to assume risk or act as intermediaries.
- Duplicative reporting when MIRL is paired with other similar programs.

Local Innovation and Fast Tract Rental (LIFT Rental)

- Program scoring criteria does not account for fast-growing or high-cost regions (ex. Central Oregon) where lower-income demographics are being displaced and the need for affordable housing still exists.
- PSU population projections did not feel accurate for the region.
- Culturally-Specific Organizations (CSO) option needs to be reworked to meet the policy objective.
  - Limited accountability for who qualifies as a CSO
  - “Check-the-box” participation rather than meaningful involvement
  - Limited capacity of qualified organizations
  - Oversubscription and lack of readiness among some participants resulting in some CSOs acting as pass through for funds to other sub-contractors or hiring on more staff to complete the work
  - Conflicts with federal funding

Low-Income Housing Tax Credit (LIHTC)

- Federal changes (25% test from previous 50% test) have impacted how LIHTC is being leveraged at the state level

- LIFT funds are all prescribed because applicants were not required or incentivized to use to use 4% LIHTC credit
- OHCS has recently required an explanation for 50+ unit developers to explain why LIHTC isn't being used – but people are still working around it

Many affordable housing projects seek to access multiple funding programs. Participants described their experiences of accessing sometimes up to four different programs and working through four different sets of documentation, modeling, and compliance processes and what they described as added cost, time, and complexity. Other participants noted that OHCS fees related to loan origination, bond issuance, and drawdown fees were high relative to other states and add significant costs to projects. Drawing from multiple funding programs may also compound these costs.

Policy Goals and Administrative Feedback

Focus group participants identified what they perceive as a lack of a clear policy hierarchy or prioritization framework within OHCS' approach to integrating policy goals with housing outcomes. Participants feel that multiple layers of policy goals (social, environmental, labor) have limited housing production through increased cost and slower decision-making. Participants discussed a desire for OHCS staff to have increased capacity to translate the policy directives and bureaucratic processes of a state agency to programs that are timely and effective for private market development processes.

While participants perceive that OHCS staff are generally responsive and accessible, participants' also discussed their perception that staff was either unwilling or unable to provide the specific information they were requesting such as specific timelines or details on decision making for projects within the queue. Focus group participants expressed frustration in what they saw as staff's limited reception to receive or integrate feedback on administrative policies (those not dictated by ORS, ex. LIFT, subsidy caps, 4% LIHTC).

Some participants felt that the state should also be prioritizing affordable housing preservation to limit the loss of affordability in existing units, sharing their opinion that the state does not move quickly enough to support acquisition of land to preserve or expand existing affordable housing stock and that these delays lead to cost increases that also compound with the cost of tenant relocation.

Possible Solutions

- **Increase funding predictability and transparency**
    - Clear waitlist positions
    - Transparent selection and prioritization criteria
    - Defined timelines for funding decisions
    - Reduce reliance on biennial uncertainty
- **Build in flexibility to application procedures, program rules, and administration**
    - Allow for minor material changes without reapplication
    - Adjustable pro formas to reflect market changes
    - Reduce administrative constraints

- **Reduce application complexity**
  - Align application requirements across programs to reduce duplicative documentation and modeling
  - Simplify and consolidate funding processes
- **Focus and align housing policy goals with production**
  - Simplify and prioritize outcomes on housing production and feasibility
  - Allow finance decisions to be more responsive to the market
- **Reform readiness metrics and prioritization schemes**
  - Avoid requirement of full permitting and upfront costs before funding
  - Align readiness expectations with realistic timelines
  - Prioritize projects that are most feasible and ready to deliver units
  - Consider additional criteria to inform prioritization such as readiness to proceed, cost efficiency, and leveraged funding (federal and local funding sources)
- **Update programmatic requirements to encourage efficient use of funds and reflect development realities**
  - Set per-unit cost benchmarks or caps to reward efficient projects
  - Adjust subsidy limits to reflect project realities, ex. increase caps for higher cost developments: higher density, mixed use projects
  - Adjust oversight requirements of MIRL
  - Optimize use of LIHTC and other funding sources / better leverage federal and private funding, ex. require or incentivize use of LIHTC
- **Expand the role of development partners and provide adequate technical support**
  - Refine CSO participation and approach, ex. invest in training and technical support for CSOs
  - Allow consultants to access capacity-building funds on behalf of smaller communities
  - Expand the role of state support, ex. assistance with local approvals, mediation between agencies and jurisdictions
- **Include affordable housing preservation as part of the priority**
  - Invest earlier (before properties reach crisis pricing)
  - Faster, flexible funding for acquisitions
- **Explore other state-level funding strategies**
  - Expand statewide incentives through a uniform property tax exemption for affordable housing
- **Strengthen interagency and state-local coordination**
  - Aligning funding timelines and commitments;
  - Clarifying roles between state and local governments
  - Invest in technical capacity and training
    - Training for developers, CSOs, and key partners
    - Training for OHCS staff in real estate/development expertise

SHPO Consultation and Permitting

	Nonprofit Sector	Private Sector	Public Sector	Other	Grand Total
4/20 - SHPO	2	1	3		6

Benefits/What's working well

Participants discussed positive working relationships with SHPO staff noting the essential roles that staff have played in connecting them with critical partners, such as Tribal Governments. Participants discussed their interactions with SHPO staff as especially beneficial when they've been connected with Tribal partners within design and conceptual phases, stating this early coordination saved significant time and cost and resulted in projects better aligned with partner priorities and goals.

Focus group participants also broadly discussed the benefits of adaptive use of historic buildings for affordable housing, which requires coordination with multiple SHPO programs, and the benefits these buildings provide to future tenants as beautiful and grounded places to live.

Challenges

Limited Knowledge on the Benefits of Early Coordination

Housing development participants discussed how their early coordination with SHPO was driven by past instances of late consultation and experiencing the resulting project consequences. One participant described not knowing when to initiate SHPO consultation leading to large and costly re-designs from late coordination with Tribal partners. Other participants described not knowing they needed to coordinate with a different division of SHPO staff overseeing HUD and NEPA, which at the time was amplified by limited capacity and competing needs of staff during COVID, and ultimately led to unanticipated and significant project modification.

Adaptive Reuse of Historic Buildings

Participants agreed that affordable housing with historic preservation elements was a small, but important part of housing production. Participants noted that it takes a lot of expertise and experience to effectively navigate funding and requirements for these types of projects which triggers nearly every possible type of review, particularly in comparison to a private market rate development which may never interact with SHPO.

Adaptive reuse of historic buildings for housing can become even more challenging to successfully execute when there are changes at the federal level to program requirements. Participants identified challenges such as general complexity of the process, inexperience of local planning, housing, or community development staff in program processes creating confusion with development partners, and specific changes such as HUD environmental review for lead becoming more stringent. Participants acknowledge SHPO's limited ability to change federal program requirements, however they felt that SHPO needs to anticipate requests for interim controls and provide guidance that can provide an appropriate level of scrutiny for different aspects of the building (exterior vs. interior living spaces).

Participants perceive that SHPO has the flexibility to interpret Secretary of Interior (SOI) design standards and guidelines differently than their current practice, implying the possibility of adaptive use of historic buildings to have more design flexibility to possibly produce more units per project or create better activation of space in instances when the building is changing to a residential use. One focus group participant shared an example of abandoning a design to activate an historic entryway in a manner that improved accessibility for future residents despite proposed changes being to an already heavily modified element.

Archaeological Permitting

Focus group participants discussed the process of archaeological permitting as an important aspect of development, particularly as a mechanism that supports alignment with the priorities and goals of Tribal government and the protection of cultural resources. However, participants also noted where the process of hiring a qualified archaeologist to obtain an archaeological permit can be time intensive and bureaucratic. Some participants described not having prior knowledge on the extent of time and cost saving that proactively obtaining an archaeological permit would have on their projects, which the noted would be particularly significant for affordable housing projects operating on thin profit margins. One participant described an instance of pausing development for 60-days to hire a qualified archaeologist and obtain an archaeological permit for an assessment that took less than an hour to complete. Other participants agreed that timelines can be even longer given the capacity constraints in Oregon for skills, trained, and qualified archaeologists.

Participants also discussed how archaeological permitting for lower importance items follows the same process and level of review as higher importance resources. Lower importance items were described as buried debris or trash while higher importance items were referred to items or resources that had importance to Tribal partners. Participants highlighted how spending limited resources and capacity on lower importance items pulled expertise and resources from more important projects.

Focus group participants pointed to a mismatch on how resources in the built environment (above ground) and archaeological resources (below ground) are defined within ORS. Participants perceive that misalignment of these definitions leads to treating materials and associated refuse from the same site and within the same time period as distinctly different things. One participant described how old, inactive infrastructure that is 75 years or older is by statute defined as an archaeological resource and subject to review. This includes items like buried rail tracks, old pieces of sidewalk, and decommissioned utility lines, many of which are already documented and may not have educational value to add to the historic record.

Duplicated or Conflicting Reviews between State and Local Government

Participants noted where SHPO was investigating possible changes to funding programs that would limit duplicated or conflicting reviews between state and local governments. These included exploring options to defer approval authority on the Special Assessment of Historic Property Program to local governments which had appropriate historic preservation ordinances in place. Alternatively, participants noted that duplication could be limited by opting into review at the state level and forgoing the same process at the local level.

Standards and Processes for Local Review of Historic Resources

One participant highlighted statutory conflicts for what standards and review processes apply to historic resources with updates from Senate Bill 974 Section 8 disallowing local governments from applying residential design standards to certain housing projects. Unlike the legislation and resulting statutes for clear and objective standards, SB 974 Section 8 did not exempt historic resources. Participants are anticipating conflicts with these statutes and shared concern over what they anticipate will be limited guidance.

Lastly, participants discussed an interest in the state developing a model code for historic resources that could enable a clear and objective review standards and move projects through to building permit without undergoing a discretionary review. While possibly a large undertaking given the diversity of historic buildings and development history, participants brainstormed possibilities of defining design elements for related periods of significance that local governments could set criteria or thresholds for within their local development codes.

Possible Solutions

- **Increase proactive outreach and engagement and expand tools for local governments and developers.**
    - Annual trainings for local governments to keep up with changing federal or state requirements
    - Provide guidance to local governments and developers on interim controls to address changing HUD ER requirements for lead
    - Guidance on navigating the NEPA process for developers and local governments
    - Guidance on obtaining archaeological permits and instances or requiring permits in areas of high likelihood
    - Outreach and awareness building of benefit for early consultation with SHPO
    - Model codes for historic review for housing to create a clear and objective pathway to move straight to building permit.
- **Further consultation with Tribes and qualified archaeologists, other relevant parties for solutions on**:

    - Exemptions for cultural surveys on sites of very low likelihood of significant archaeological resources in a way that is aligned with process and priorities of Tribes.
    - Fast-tracked archaeological permitting for projects that already must go through NEPA, have a qualified archaeologist hired, and have an Inadvertent Discovery Plans (IDPs) in place.
- Simplify and clarify review processes
    - Change definition of archaeological resources to exclude old, buried infrastructure without educational value from review and permitting processes
    - Expand administrative rules for statutes that apply to historic resources in the built environment
    - Clarity on SB 974 Section 8 and 197A.400 – residential design standards to certain housing projects
    - Reduce duplicated reviews or approvals by reaching agreements between local governments and SHPO by leveraging existing historic preservation ordinances
- Further explore the extent of flexibility in the interpretation of SOI standards

Redevelopment

	Nonprofit Sector	Private Sector	Public Sector	Other	Grand Total
4/17 - Redevelopment	3	2	2	1	8

Benefits/What's working

Participants attributed middle housing legislation as responsible for spurring housing production and redevelopment. One individual shared that they saw the intensification in single dwelling zones in Portland being attributable to legislation. Another participant discussed how they saw legislation related to needed housing as helpful in addressing local jurisdictions that are resistant to development, particularly from the perspective of private development, and legislation related to housing by right (clear and objective standards) working to lessen the impact of community NIMBYism.

Another participant shared an example of a successful public-private partnership and utilization of state funding and support. They described a master plan development which partnered with the city to create an urban renewal district and complete a local improvement district study. This project was able to access early gap financing working with DEQ and the State Infrastructure Bank to receive a low-interest loan while the project waited for tax revenue to accrue. A nonprofit participant shared positive feedback on working with DEQ for support during public outreach of a site cleanup.

Broadly, participants agreed that early consultation with relevant state agencies and local governments cut down significantly on the time on asynchronous coordination. They noted how clarifying a one-on-one meeting could be for moving a development forward.

Challenges

Participants discussed the challenges associated with redevelopment and infill projects, noting that even when extensive research and site assessments are completed prior to redevelopment that unexpected site conditions can still emerge. One participant described the discovery of a buried oil tanker during the second phase of site construction. Because the issue was identified late, it was particularly difficult and costly to address. They noted that the additional expense ultimately came out of the developer's fee, which are generally constrained for affordable housing developments.

Some participants also highlighted the growing challenge of developing affordable housing on less-than-ideal sites. As communities attempt to pursue policy goals related to increased density within existing urban areas, developers are increasingly asked to work with sites that may have significant constraints. This creates tension between achieving desired land use goals and housing outcomes and managing the rising costs associated with site preparation.

Another concern raised was the cost of bringing infill projects into compliance with modern standards and regulations such as stormwater and sidewalks. Participants expressed concerns about fairness, noting that redevelopment and infill projects are often required to bear the cost when neighborhood infrastructure is outdated.

Wetlands

Participants identified wetlands regulations as a challenging process to navigate for redevelopment and infill projects. Focus group participants sited multiple examples where projects encountered significant challenges meeting mitigation requirements. In one case, the participant described a stalled project resulting from the lack of wetland mitigation credits available for purchase and the project being considered too large to qualify for payment-in-lieu option. In the participant's experience, DSL could not provide a clear threshold for what is considered a "large" project. Participants described these situations as creating uncertainty and making it difficult to identify a viable path forward for development.

Focus group participants also identified challenges with off-site mitigation requirements. One participant reported that DSL lacked a clear set of standards or design specifications to guide mitigation planning and was not available to provide direct consultation on mitigation design. As a result, developers were left to navigate the process with limited guidance, increasing project risk, costs, and timelines.

Participants further discussed situations in which development density was reduced to preserve wetlands that were perceived as low-value or non-significant. They expressed frustration with the time and expense associated with completing alternatives analyses required by DSL, particularly when those efforts ultimately did not produce a workable solution for the site. In these cases, the regulatory process added substantial costs and delays while limiting development potential, particularly for an infill site, without necessarily resulting in outcomes that participants viewed as proportionate to the value of the wetlands being protected.

Brownfields

Several participants indicated that regulatory requirements for brownfield sites were unclear or seemed subject to change over the course of a project. For example, one participant reported having limited knowledge on the scale of required site testing at the outset of development. In addition, focus group participants noted that many developers often lack familiarity with the brownfield redevelopment process because relatively few projects involve contaminated sites. As a result, participants reported not having a clear understanding of how many steps are required, what each step entails, or how long individual phases of the process are likely to take. This lack of predictability increases project risk and can discourage redevelopment efforts.

The DEQ plan review process was also identified as a source of delay. Participants explained that plan reviews and revisions are typically completed asynchronously, requiring back-and-forth communication between developers and the agency. When submitted revisions do not fully meet expectations, additional rounds of review are required, extending project timelines and increasing costs.

Focus group participants shared that they had not accessed brownfield-related funds from Business Oregon because they were deterred by the complexity of the application process. They described the application and approval process as time-consuming and involving numerous steps and rounds of revisions. Some suggested that otherwise eligible projects were choosing not to pursue the funding because the process is perceived as too burdensome and the timeline for receiving assistance is too unpredictable. Participants also noted that the timing of the funding application and review process is often poorly aligned with the schedules and deadlines imposed by other project funders, creating additional challenges for project financing and implementation.

Financial Tools and Resources

Participants identified several financial and regulatory factors that increase project risk and complicate redevelopment and housing development efforts. One recurring concern was the timing of System Development Charge (SDC) payments. Participants noted that requiring SDCs to be paid at the beginning of the development process increases financial risk and can negatively affect how banks and other financial institutions evaluate a project. Because the fees are collected before the development is generating impacts on public facilities, some participants questioned whether the timing is appropriate. Although SDC deferral programs exist, participants indicated that the administrative requirements associated with those programs can make them unpopular or lead developers to conclude that the benefits are not worth the effort.

Participants also discussed the role of Prospective Purchaser Agreements (PPAs) in brownfield redevelopment specifically. PPAs can provide a high degree of certainty for funders and investors because they clearly define the required steps, performance metrics, and cleanup process for a site. However, participants noted that obtaining a PPA can be both time-intensive and costly. They also described challenges in closing out PPAs when the criteria that must be met or the testing requirements evolve over time, creating uncertainty late in the development process. Despite these challenges, some participants viewed PPAs as a stronger long-term option because they are legally enforceable and have been adjudicated through the courts. By comparison, a No Further Action (NFA) determination can be revisited at a later date. However, participants noted that financial institutions are generally more familiar with and likely to recognize NFAs than PPAs when evaluating project risk.

Conflicting Policy Goals

Prevailing wage requirements were also identified as a barrier in certain redevelopment projects. Participants noted that building conversions from commercial to residential use are not eligible for certain Bureau of Labor and Industries (BOLI) exemptions because wage determinations are based on the building's existing use rather than its future use. As a result, affordable housing developers may face higher labor costs when converting commercial buildings to housing. Participants further noted that affordable housing developers are often limited in their ability to pursue mixed-use projects because those developments may not qualify for prevailing wage exemptions.

Participants expressed concerns about the alignment of state funding programs. Participants felt that requirements across programs administered by different state agencies may conflict with one another, making it difficult to satisfy all funding requirements simultaneously. Participants described situations where complying with one program's requirements could reduce the number of housing units a project is able to deliver, creating tension between policy objectives for environmental protections and housing. Additionally, they also noted that state funding timelines are often not well aligned with development schedules, introducing additional uncertainty and delay into project delivery.

Finally, participants identified a lack of outside capital as a significant challenge, particularly for large-scale environmental remediation projects (that would enable housing development). They noted that the substantial upfront costs and risks associated with cleanup activities can make it difficult to attract private investment, limiting the feasibility of redeveloping contaminated or complex sites.

Possible solutions

- **Increase clarity around regulations and procedures for environmental resources and support direct coordination with regulating agency.**
  - (DSL) Clear and objective standards for wetlands, ex. definitions of project size eligible for payment in lieu of mitigation, standards for ex. creek design/mitigation project specs
  - (DEQ) Technical support meetings to review brownfield remediation plans - to review and address needed revisions; cut down on time spent on iterations
  - (DEQ) Clarify timeline on brownfield remediation steps, anticipated timeline, and what each step generally includes
- **Quick access/easy to access to state funding when unexpected site needs emerge during redevelopment.**
  - (Biz OR) Quicker process of evaluating applications, better alignment with funder timelines
- **Increased interagency coordination**
  - Early consultation meetings with relevant state agencies and local governments as a standard business practice
  - Alignment across state agencies on needed housing as a metric or criteria
  - Alignment of state funding program requirements that intend to facilitate housing development; Current funding programs that can be paired/are compatible with each other
- **Policy changes that expediate development timelines, provide wetland mitigation options, and increase financial feasibility**
  - State action on SDCs – push to end of development cycle (ex. at point of issuing certificate of occupancy), limit on deferral fees
  - Housing allowed by right at the local level
  - State involvement in encouraging banks/financial institutions to recognize PPAs as equivalent to NFAs for site remediation and eliminating liability.

Wetlands

	Nonprofit Sector	Private Sector	Public Sector	Other	Grand Total
4/16- Wetlands		5	8	1	14

Benefits/Working Well

Participants generally offered positive feedback regarding the accessibility and responsiveness of Oregon Department of State Lands (DSL) staff. They noted that DSL staff are willing to engage with applicants early in the development process and provide consistent interpretations of applicable rules and requirements. Participants emphasized that the most effective form of assistance is often direct conversation with staff, which can help clarify expectations, resolve questions, and reduce uncertainty before significant project resources are invested.

Participants also observed improvements in review timelines at the U.S. Army Corps of Engineers (US ACE) with one participant citing an example of a review by US ACE completed in 10 days. This increased responsiveness was viewed as a positive development that can help reduce delays.

Focus group participants identified interagency collaboration as another factor that has improved development outcomes. Participants noted that regional meetings and direct communication among DSL, the US ACE, and local governments helped to align expectations across agencies. Participants felt that these efforts reduce confusion, provide greater consistency in regulatory implementation, and minimize delays that may arise when applicants receive differing guidance from multiple entities.

Participants also highlighted the value of wetland mapping and delineation efforts. Accurate maps and delineations provide greater certainty about the location and extent of wetlands on a site, allowing developers and local governments to identify potential constraints earlier in the planning process. This information can improve project planning, reduce risk, and help avoid costly surprises later in development.

Finally, participants spoke positively about existing technical assistance programs and grant opportunities that support planning activities, inventories, and related pre-development work. These programs were described as relatively easy to access and helpful in reducing project costs. However, participants noted that the scale of available funding and assistance is often limited, which can reduce their effectiveness for larger or more complex projects.

Challenges

Wetland Definitions

Participants expressed concerns that current wetland definitions used in the state are overly broad and can capture areas that they believe have limited ecological value. They noted that differences between state and federal wetland definitions can create confusion and uncertainty about which standards apply to a particular site. Participants also questioned what characteristics should be sufficient to qualify an area as a wetland, particularly in cases where wetlands are small, scattered across a property, or consist of isolated pockets rather than large, contiguous wetland areas.

Several participants noted that the presence of hydric soils alone can often trigger wetland classification. They questioned whether this approach appropriately reflects the ecological function and significance of a site, particularly when other wetland characteristics are limited or absent. Participants suggested that these broad definitions can result in development constraints on land that they perceive as having relatively low environmental value.

A related concern was the perceived lack of differentiation between wetlands of varying quality and ecological function. Participants noted that low-value wetlands, sometimes referred to as "nickel wetlands," are often subject to the same regulatory requirements as higher-value wetlands. Examples included farmed soils or areas with hydric soils that participants felt provided little meaningful ecological function. They expressed frustration that these sites are regulated to the same extent and through the same processes as wetlands with significant habitat, water quality, or ecosystem benefits.

According to participants, the absence of distinctions based on wetland quality can reduce the amount of buildable land available within Urban Growth Boundaries (UGBs). Participants viewed this as a significant challenge because land that could otherwise accommodate housing or other development within a city's land supply may be constrained by wetlands that they perceive as having limited environmental significance. Focus group participants argued that current regulatory approaches can limit actual development capacity and density while contributing to challenges in meeting housing and redevelopment goals.

Wetland Mitigation

Focus group participants described wetland mitigation requirements as a significant source of uncertainty, cost, and delay in the development process. Participants noted that the Payment-In-Lieu (PIL) program is not available for larger wetland impacts due to size limitations and stated that the actual size threshold that was unknown to them. Some participants perceived that DSL is reluctant to manage PIL funds, which they felt further limits the usefulness of this mitigation pathway. Participants also noted that the US ACE does not recognize PIL mitigation options, creating additional complications for projects that require approvals from both state and federal agencies.

Participants also discussed challenges associated with the wetland mitigation banking system. They noted difficulties in establishing and maintaining mitigation banks, including challenges identifying appropriate locations and concerns about long-term maintenance obligations. Several participants described a lack of clear long-term stewardship or exit strategies for mitigation sites, which can create ongoing liabilities for those responsible for managing them. In addition, they reported that wetland mitigation credits can be difficult to obtain and are often expensive when they are available, increasing project costs.

Participants generally viewed on-site mitigation as impractical for many urban development projects. They cited high mitigation ratios as a significant barrier, noting that the amount of land required for mitigation can substantially reduce site development potential and make projects less financially feasible.

Participants also noted that restrictions on the use of on-site mitigation in urban settings further limit available options. Even when developers are willing to pursue on-site mitigation, regulatory requirements may favor other mitigation approaches or impose constraints that make on-site solutions difficult to implement. As a result, participants felt that existing mitigation requirements can reduce flexibility and increase both the cost and complexity of development projects, particularly within UGBs where they perceive that land availability is already constrained.

Local Wetlands Inventories

Participants identified several challenges associated with Local Wetlands Inventories (LWIs), noting that they believe both small and large cities avoid undertaking them. Cost was cited as a primary concern, as LWIs can be expensive to produce and maintain. Participants questioned who should bear the cost of developing and maintaining these inventories, which currently fall to local governments, when similar obligations do not exist for many other Goal 5 resource inventories. Several participants viewed this requirement as an unfunded mandate that places a disproportionate burden on local governments, particularly for smaller jurisdictions, and that existing funding for LWIs and related planning work is oversubscribed, highly competitive, and hard to access.

Participants also noted that communities may be disadvantaged when they do not have an adopted LWI. In some cases, the absence of an LWI can create barriers to annexation or other development activities. At the same time, participants questioned the practical value of LWIs because they do not carry significant regulatory weight and cannot replace site-specific wetland delineations required by DSL. Even when a city has invested in preparing and adopting an LWI into their comprehensive plan through Goal 5 processes, property owners must still complete delineations and obtain separate agency approvals. Several participants observed that other Goal 5 inventories do not require a similar secondary review by a state agency after adoption into a comprehensive plan.

Participants suggested that LWIs could be more effective if they played a stronger regulatory role and provided greater certainty for both local governments and developers. Some recommended conducting comprehensive jurisdiction-wide inventories that clearly identify wetland resources and establish a higher level of confidence in mapping and resource identification. Other participants noted that the existing statewide map was too coarse to do any of this work meaningfully and runs into the same issues as LWIs. Participants indicated that if LWIs were strengthened and given greater standing in regulatory processes, jurisdictions and property owners might not need to complete separate jurisdictional reviews or delineations for every individual property. They argued that this approach could reduce duplication, streamline permitting, improve predictability, and provide greater value from the investments local governments make in preparing and maintaining LWIs.

Wetland Delineations

Participants identified delineation as a status that is subject to expiration. In some cases, a delineation may need to be re-done, adding to cost and timeline for development.

Removal-Fill Permitting

The process of obtaining removal-fill permits was described as time-consuming and complex because permit approval is often contingent upon first securing an approved mitigation plan. Participants explained that mitigation requirements can create substantial delays in the permitting process, especially when projects must complete alternatives analyses. These analyses often require specialized expertise, making it necessary to hire environmental consultants to navigate the process. Participants noted that the permitting system can be difficult to understand without experienced professional assistance.

Participants also noted that removal-fill permits cannot be issued solely based on information contained in an LWI, resulting in what they viewed as a duplicative process.

Legal Appeals

Legal challenges were also raised as a source of delay and uncertainty. Participants described situations in which third parties requested hearings on permit decisions, resulting in six to eight months or more of additional delay. They expressed concern that the threshold for filing such challenges is relatively low, allowing projects to be delayed even when applicants have invested significant time and resources in permit preparation. Participants also cited unpredictability in agency decisions and outcomes, making it difficult to assess project timelines and risks with confidence.

Inter-agency Coordination

The involvement of multiple regulatory agencies, particularly including DSL, US ACE, and DLCD, was identified as another factor contributing to complexity. Participants noted that navigating the requirements of multiple agencies can result in duplicative reviews, inconsistent expectations, and additional administrative burden. As a result, successful navigation of the mitigation and permitting process often requires highly skilled consultants who understand the regulatory system and can effectively coordinate among agencies.

Tension Between Land Use Goals

Participants described a perceived tension between wetland protection requirements under Goal 5 and statewide goals related to housing development and urbanization(Goal 10 and Goal 14). They noted that communities are expected to accommodate growth and housing needs within urban growth boundaries (UGBs), while at the same time protecting wetland resources that may limit the amount of developable land available. Several participants felt that these competing objectives can create challenges for local governments attempting to balance resource protection with urban development goals.

One participant shared an example of a jurisdiction that completed a UGB expansion only to discover later that land could not be annexed without first preparing an LWI. The same participant noted that a previous UGB expansion had not triggered the same requirement, creating confusion about when and how LWIs are applied or required in this process. Another participant described a UGB expansion process in which the location of wetlands was not allowed to be considered during boundary planning, resulting in the inclusion of land that was later found to be approximately 30 to 40 percent wetlands, reducing the amount of developable land available within the expansion area and limiting the community's ability to meet projected housing needs.

Participants further argued that the protection of small urban wetlands conflicts with broader urbanization goals. In their view, preserving wetlands with limited ecological value within urban areas may reduce development capacity inside UGBs and limit opportunities for higher-density housing. They noted that when development potential is constrained within urban areas, growth may be pushed to locations outside existing urban boundaries. According to participants, this can lead to lower overall density, more dispersed patterns of development, and increased pressure for outward expansion. Participants suggested that these outcomes may run counter to the objectives of both the wetland protection and urbanization goals by encouraging development patterns that are more characteristic of sprawl rather than compact urban growth.

Possible Solutions

- Update wetland definitions and classification approach
  - Distinguish between low-value and high-value wetlands
  - Better reflect actual ecological function
  - Address issue with "formerly farmed" wetlands within the Willamette Valley
  - Align with federal definition of wetlands
- Expand Mitigation Options
  - Reform on-site mitigation requirements
    - Allow more on-site mitigation and consolidation
    - Reduce the mitigation ratio for low value wetlands
  - Recognize alternative mitigation strategies
    - Consider allowing stream/river restoration and improvement projects as a form of mitigation credit.
    - Integrate with stormwater to meet dual purposes of detention, infiltration, pre-treatment, e.g. Green stormwater
  - Increase supply of available credits and create opportunities for mitigation banks
    - Support the long term maintenance of mitigation banks
    - Expand mitigation bank partnerships; explore and model different bank ownership models
    - Reduce regulatory barriers for banks
    - Address long-term stewardship ("exit") issues
    - Create incentives for private investors to develop mitigation banks
- Make Payment in Lieu PIL an viable option (viewed as a high-impact solution)
  - Require state to actively use funds for mitigation
  - Clarify the threshold limits; expand criteria to include larger projects
  - Require the state to spend in lieu fees to purchase property and pro-actively protect wetlands

- **Strength and Clarify LWI**
    - Give LWI regulatory authority – remove DSL jurisdiction over wetlands within UGBs which are subject to the city's acknowledged goal 5 inventory and have protections established in the jurisdictions development code.
    - Allow reliance on LWIs instead of repeated delineations
    - Expand funding for LWI development, especially for small jurisdictions
- **Align wetland policies with housing and land use goals**
    - Integrate wetland decisions within UGB and housing planning
- **Improve use of technical assistance and funding**
    - Target towards high-need jurisdictions
    - Shift from guidance documents to implementation resources and staff
    - Mapping: Adequate funding to make sure the wetland maps and other resources are accurate - and provide enough information for jurisdictions to use them without significant additional work.
- **Streamline permitting**
    - Enforce statutory timelines (ex. 120-day review clock)
    - Increase staffing and legal resources
    - Limit or streamline contested cases: complete a contested case hearing (issue a final order) within 180 days of the date a request for hearing is filed
- **Clarify DSL policy and increase flexibility**
    - Increase awareness/transparency of where policies or standards are reflected

Building Codes

	Nonprofit Sector	Private Sector	Public Sector	Other	Grand Total
4/22 - building codes	5	1	5		11

Benefits/Working Well

Participants generally viewed Oregon's statewide building code system as a significant strength. They noted that having a single code that applies across jurisdictions creates consistency and predictability for developers, designers, builders, and code officials. This uniformity allows project teams to use repeatable designs across multiple communities, creating efficiencies and reducing the need to adapt projects to differing local requirements. Participants emphasized that the statewide system also helps designers, builders, and reviewers work from shared expectations, improving communication and streamlining project delivery. Participants felt that the statewide code supports efficiency in permitting and plan review processes because jurisdictions are applying the same standards.

Participants further emphasized that statewide building codes provide an important foundation for public safety, resilience, and the effective functioning of the construction and housing markets. They expressed strong confidence in the technical basis of the code and its role in ensuring fire safety, life safety, structural integrity, and long-term building performance. Participants noted that these protections support other critical systems, including insurance, lending, and real estate markets, by providing confidence that buildings are designed and constructed to consistent standards. While participants identified opportunities for improvement within the code system, they generally agreed that these core protections and functions should not be weakened.

Participants also highlighted examples of flexibility within the code framework. Several pointed to the energy code as a model because it includes multiple compliance pathways, such as prescriptive and performance-based options. These approaches can create opportunities for innovation and allow project teams to pursue alternative methods for meeting code requirements. However, participants noted that although these compliance pathways exist, they may be used less frequently in practice due to familiarity with traditional approaches, uncertainty about alternative methods, or challenges associated with demonstrating compliance.

Participants spoke positively about the availability of technical resources and support from the Oregon Building Codes Division (BCD). BCD's technical guidance documents and staff assistance were cited as valuable resources that help applicants and local jurisdictions interpret and apply code requirements. Participants particularly appreciated written guidance developed for emerging or less familiar housing types, noting that clear documentation can significantly reduce uncertainty and improve consistency in code administration. When available, these resources help local governments, designers, and developers navigate new code requirements more efficiently.

Participants also described the Building Evaluation and Specialized Assistance (BESA) process as functioning effectively. They noted that the program benefits from being supported through enterprise funding mechanisms, which may contribute to its responsiveness and ability to provide assistance. Overall, participants viewed the program as a positive example of a state resource that is helping stakeholders navigate building code requirements and project review processes.

Challenges

Building Code Alignment with Housing and Land Use Goals

Participants described a growing misalignment between building codes, land use regulations, and housing policy objectives, particularly with respect to middle housing. They noted that many code provisions appear to be designed primarily for either single-family homes or larger commercial and multifamily buildings, leaving middle housing types such as duplexes, triplexes, fourplexes, and cottage clusters in an awkward regulatory space. As a result, some requirements were viewed as overly stringent for projects of this scale. Participants cited examples such as sprinkler and elevator requirements that can substantially increase project costs and reduce the feasibility of middle housing development.

Participants also identified conflicts between building code requirements and local zoning standards. Shared amenities and infrastructure, such as bicycle parking facilities, trash enclosures, and common areas, can be treated differently under various regulatory frameworks, creating complications during project design and review. Some participants further questioned whether graywater regulations and other environmental requirements are always applied at an appropriate scale, arguing that standards designed for larger developments may create unnecessary burdens when applied to smaller housing projects.

Statewide Uniformity and Local Conditions

While participants generally valued the consistency provided by a statewide building code, some expressed concern that a uniform code does not always account for meaningful differences between rural and urban communities. They noted that variations in climate, development patterns, and market conditions can create challenges when a uniform set of requirements is applied across diverse regions of the state. Participants suggested that some requirements may be more difficult or costly to implement in rural communities, where projects tend to be smaller and technical resources may be more limited.

Complexity and Accessibility of the Building Code

Participants described the building code as difficult to navigate, particularly for those who do not work with it regularly. They noted that, although flexibility exists in some areas of the code, many users are unaware of available alternative compliance pathways or struggle to understand how to utilize them. Participants observed a tension between flexibility and predictability, noting that systems designed to allow alternative approaches can also create uncertainty for applicants and reviewers.

Several participants emphasized that successfully navigating the code often requires specialized expertise. This can create challenges for small design firms, rural builders, smaller jurisdictions, and developers who pursue projects infrequently. Participants also identified adaptive reuse projects and historic preservation projects as another area where specialization and expertise are needed to navigate the code effectively.

Variability in Code Interpretation and Plan Review

Participants reported that building code interpretations can vary across jurisdictions, even within a statewide code system. Examples included differences in how local jurisdictions interpret requirements related to egress, stormwater management, and sound transmission. Participants noted that these variations can create uncertainty for project teams working in multiple communities.

Plan review processes were also described as inconsistent across jurisdictions. Participants reported significant variability in review expectations, documentation requirements, and review timelines. Some suggested that inspectors with extensive building science training may conduct more detailed reviews, which can increase review times. Others noted that inspectors are primarily trained and tasked as regulators responsible for enforcing code requirements, which may make it more difficult to consider alternative compliance methods or innovative approaches.

Participants further expressed concerns about the lack of standardized expectations for plan submissions. Multiple review cycles are common, and relatively minor formatting, organizational, or documentation issues can sometimes result in substantial delays. Inconsistent redlining practices were also identified as a challenge, making it difficult for applicants to understand how comments are being applied and what revisions are required for approval.

Code Update Cycles

Participants identified the three-year code update cycle as another challenge. They noted that new code requirements are introduced frequently, leaving limited time for designers, contractors, inspectors, and local jurisdictions to fully understand and implement changes before the next update cycle begins. According to participants, this can create confusion throughout the industry, increase training needs, and contribute to inefficiencies and higher project costs.

Training and Knowledge Gaps

Training and education were frequently cited as areas where improvements could enhance code implementation. Participants expressed concern that some inspectors may have limited training in building science, potentially reducing flexibility when interpreting code requirements or evaluating new technologies and construction methods. Participants suggested that this can make innovative materials, systems, or building approaches more difficult to approve.

They also noted the importance of ongoing training for contractors, designers, and other industry professionals. Participants indicated that key parties do not always receive timely or adequate information about code changes, which can contribute to misunderstandings, project delays, and inconsistent implementation of new requirements.

Cost Burdens and Energy Code Requirements

Participants described several building code provisions as creating significant cost burdens, particularly in relation to energy efficiency requirements. One commonly cited example was the requirement for energy recovery ventilation (ERV) systems. Participants noted that these systems can be expensive to install and operate, and some reported concerns that improperly functioning systems may actually underperform and/or contribute to issues such as mold, moisture, or indoor air quality problems.

Participants also expressed concern that some requirements apply commercial-scale systems or standards to relatively small projects, increasing costs without a corresponding benefit. Additional examples included requirements for solar-ready infrastructure that may never be used. Some participants suggested that portions of the energy code have expanded beyond what they view as the original purpose of the code, resulting in requirements that may not always align with project needs or market realities.

<u>Permitting Capacity and Funding Challenges</u>

Long and unpredictable permitting timelines were identified as a major obstacle to development at the local level. Participants reported experiencing review periods ranging from several months to a year. They attributed these delays to staffing shortages, fluctuations in development activity, and limited resources within local building departments. Uncertainty around permit timelines can create financing challenges, increase carrying costs, and complicate project scheduling.

Participants also raised concerns about the statutory requirement that structure funding for local building divisions primarily on permit fees. They suggested that fee-based funding models can make it difficult for jurisdictions to maintain adequate staffing levels, particularly during economic downturns or periods of reduced construction activity. According to participants, this funding structure can contribute to staffing shortages, reduced capacity, and longer permitting timelines, ultimately affecting both applicants and local governments.

Possible Solutions

- **Improve consistency and standardization across jurisdictions**
  - Clearer statewide interpretations
  - Standardized expectations for plan sets and submittal requirements
  - Encourage proactive and clear communication at the local level to reduce administrative burden
- **Increase outreach and awareness of existing tools and programs / Expand and promote guidance materials**
  - "Brochure quality user guides" on specific housing types, specifically: two story stacked duplexes
  - Statewide Alternate Methods, Interpretations and Technical Bulletins
  - Written code guides
  - Examples of good plans, templates, and best practices
  - Statewide checklist of what should be on drawings

    - Promote and increase awareness of the BESA program to relieve to local departments experiencing capacity shortages or increased permit volumes
- **Develop code standards tailored to small multi-unit developments (2-4 units)**
    - Apply residential code to 2-4 units instead of commercial code
- **Adjust specific high-cost requirements while maintaining fire, life, and safety standards**
    - Sprinkler systems
    - Elevator rules
- **Extend code updates cycles and support training**
    - Length code update cycle 6 years v. 3 years
    - Accessible training and technical support resources for building officials, inspectors, contractors and designers especially in rural areas
- **Enable innovation and alternative methods**
    - Clearer pathways for approving new construction techniques
    - Increased capacity for evaluating proposals
- **Expand shared service models like BESA**
- **Set timelines for permit review on residential building permits**
    - 60-day shot clock on new residential permits for local jurisdiction to issue a permit
    - Provide incentives or penalties tied to timelines, ex. 50% of your money back as the applicant.
- **Standardized plan templates**
    - Pre-approved plans
    - Pre-reviewed assemblies
- **Consider separating policy goals not directly related to life, health, and safety from the building code**
    - Implement energy mandates as incentive programs or financial tools

Poll results across focus groups

Q1: What state policies or programs are holding Oregon back from more housing production? N=80

- Fragmented and burdensome regulatory environment
- Permitting delays
- Slow, limited, or conflicting guidance from agencies
- Wetland and environmental permitting
- Infrastructure funding gaps
- Structural constraints on land availability
- Prevailing wage
- Misalignment of funding programs and development reality
- Tension between planning goals and current housing goals
- Legislature overly focused on details instead of outcomes

Q2: Where should the state prioritize funding in order to boost housing production? N = 87

Projects with the greatest feasibility (shortest or easiest path to construction)	21	24%
Projects tied to the greatest housing need	14	16%
Transportation infrastructure	12	14%
Producing regulated affordable housing (<80% AMI)	10	11%
Wastewater infrastructure	8	9%
Land or site acquisition	7	8%
Projects in communities with highest forecasted growth	7	8%
Pre-development funding	5	6%
Capital for market rate housing	2	2%
Stormwater infrastructure	1	1%

Q3: What state-level financial or technical support would most benefit housing production and why? N=80

- Infrastructure funding is the primary bottleneck
- Capacity constraints of local governments, esp. rural and small jurisdictions, and small and emerging developers
- Limited expertise in real estate finance and deal-making
- Misalignment and complexity in funding system
- Need gap financing and new financial tools
- Integrating infrastructure planning (with land use)
- Simplify and standardize processes – rules, document templates, clear information

- Better coordination across state agencies and with local governments and developers

Other Focus Group Input / Out of Scope

Participants frequently highlighted issues related to BOLI and prevailing wage as it related to housing production broadly. This topic came up in five (out of 12) focus groups which included the following:

- 4/10 – Infrastructure
- 4/13 – Affordable
- 4/17- Redevelopment
- 4/24 – Affordable Housing
- 5/8 – Infrastructure

The following summarizes the key themes related to conversations about BOLI and prevailing wage:

- Unclear when rules apply
- Once rules are applied, they always apply – implication for phased development and future renovation
- Discourages denser development and mixed use
- Confusion on use conversion projects - evaluated by current use or future use, ex. from commercial to residential
- Increase construction costs (~20%) – implications for redesign or project delay
- Adds complexity to private-public partnerships
- State infrastructure funding can unintentionally trigger prevailing wage

Follow-up Form and Emailed Input

The following summaries the key points discussed within follow-up form responses (n=23) or provided to the IPRE research team over email (n=3).

Regulatory Barriers and Process Inefficiencies

Respondents consistently emphasized that complex, unclear, and inconsistent regulations significantly delay or prevent housing production. Land use approval processes were described as lengthy, costly, and unpredictable, with some projects taking years to advance. Agencies were viewed as applying rules inconsistently or using outdated criteria, particularly in environmental reviews such as wetlands determinations. The broader concern is that the system is "thinking inside the same box," limiting meaningful change.

Appeals processes, especially through LUBA, were cited as a major bottleneck, with low thresholds (to bring forward an appeal) encouraging frivolous appeals that increase costs and timelines. Additionally, frequent regulatory changes create uncertainty for developers, lenders, and local governments, making long-term planning difficult. Respondents perceive that even well-intentioned reform efforts often produce more regulation and administrative burden rather than simplification.

Solutions Proposed

- Streamline permitting and review processes to reduce delays and redundancy
- Raise thresholds or costs for appeals to discourage frivolous challenges
- Provide clearer, more objective standards across agencies (especially environmental rules)
- Reduce frequency of regulatory changes to improve predictability
- Establish consistent statewide processes for hearings, appeals, and permit completeness
- Improve interagency coordination to eliminate conflicting rules
- Shift more conflict resolution to planning stages rather than project approval stages

Land Availability and Urban Growth Boundaries

Respondents highlight the gap between "theoretical" and "actual" developable land supply. Reported capacity often overestimates available land, failing to account for unwilling sellers, environmental constraints, or other practical barriers. Respondents describe UGB expansion processes as highly constrained, legally complex, and difficult to navigate, limiting the ability to bring land into the development pipeline. The system is also criticized for what participants perceive as reliance on rigid agricultural designations.

Solutions Proposed

- Reassess buildable lands inventories to reflect true market availability
- Extend UGB planning horizons (e.g., 30 years) to ensure adequate land pipeline
- Simplify and expedite UGB expansion processes
- Introduce more flexibility in evaluating agricultural land suitability
- Ensure a continuous pipeline of developable land rather than reactive expansion

Environmental and Wetlands Regulations

Wetlands regulation emerged as one of the most significant barriers discussed by respondents within the follow-up form and emailed input. Respondents described unclear criteria, inconsistent interpretations, and lengthy permitting timelines, sometimes resulting in projects losing funding. Examples were reported where low-quality or "artificial wetlands" (e.g., caused by failing drainage systems) were regulated as significant environmental constraints.

Respondents also viewed mitigation requirements as rigid and impractical particularly requirements for on-site mitigation when feasible alternatives were unavailable. Respondents highlight a need for flexibility grounded in real conditions rather than static classifications aligns with critiques of land supply planning.

Solutions Proposed

- Modernize wetlands definitions using current science (soil, hydrology, biology)
- Align standards across agencies (DSL, DEQ, DLCD, etc.)
- Allow more flexible mitigation options, including off-site or fee-in-lieu solutions
- Provide clear guidance on evaluation criteria
- Reduce delays in site inspections and determinations
- Defer more authority to local jurisdictions and scientific reports

Infrastructure Constraints and Financing

A dominant theme in respondent input was that infrastructure—not zoning—is often the primary constraint on housing production. Costs of water, sewer, transportation, and stormwater systems are frequently borne upfront by developers, who may not be reimbursed fairly or promptly. System Development Charges (SDCs) and infrastructure requirements were described as financial barriers that increase housing costs and slow development timelines.

Respondent opinion is that infrastructure is foundational but under-addressed in policy discussions, and that current planning systems underestimate the time and coordination required to deliver both land and infrastructure. There is also a concern that policy conversations remain incremental rather than transformative, failing to address structural infrastructure funding gaps.

Solutions Proposed

- Increase state funding for infrastructure, especially targeted investments
- Provide low-interest loans, grants, or forgivable financing for infrastructure
- Reform SDC policies, including:
    - Delaying payment timing
    - Allowing interest on reimbursements
    - Removing reimbursement expiration dates
- Fund infrastructure upfront rather than relying on developers
- Waive or subsidize SDC fees in priority areas
- Support infill development with modified stormwater requirements

State–Local Coordination and Capacity

Many responses highlighted a growing disconnect between state agencies and local governments. Cities reported lacking staff capacity to implement state mandates, while also facing complex and frequent policy changes.

Some respondents felt that systemic change is being hindered by institutional inertia and risk aversion. Even collaborative processes (e.g., TACs) tend to reproduce existing paradigms rather than challenge them.

Smaller and rural jurisdictions struggle the most, often lacking the resources to participate in programs or update codes.

Solutions Proposed

- Fund local staff capacity and planning efforts
- Provide consultant teams to help cities update codes
- Improve collaboration between state and local governments
- Reform advisory and rulemaking processes to prioritize outcomes over process
- Allow more local flexibility instead of one-size-fits-all mandates
- Reposition state agencies as partners and facilitators rather than enforcers
- Simplify program requirements to reduce administrative burden
- Create feedback loops to evaluate whether policies are working in practice

Land Use Planning and Zoning

Respondents noted that land use systems can be overly rigid, with layered regulations, density mandates, and procedural complexity hindering development. Policies often assume land and infrastructure can be mobilized quickly, when they require long-term planning and coordination.

Urban Growth Boundary (UGB) policies and restrictions on fringe development were also criticized. Respondents highlight the gap between "theoretical" and "actual" developable land supply. Respondents perceive that reported capacity often overestimates available land, failing to account for unwilling sellers, environmental constraints, or other practical barriers. Respondents describe UGB expansion processes as highly constrained, legally complex, and difficult to navigate, limiting the ability to bring land into the development pipeline. The system is also criticized for what participants perceive as reliance on rigid agricultural designations.

At the same time, some respondents emphasized the need to better utilize underused land within cities (infill and redevelopment).

Solutions Proposed

- Reduce minimum lot sizes, setbacks, and parking requirements
- Enable easier upzoning and higher density development
- Expand opportunities for "missing middle" housing
- Encourage redevelopment of underutilized urban land (greyfields)
- Provide extraterritorial jurisdiction or reforms in urban fringe areas
- Reassess buildable lands inventories to reflect true market availability
- Extend UGB planning horizons (e.g., 30 years) to ensure adequate land pipeline
- Simplify and expedite UGB expansion processes
- Introduce more flexibility in evaluating agricultural land suitability
- Ensure a continuous pipeline of developable land rather than reactive expansion

Building Code and Design Requirements

Several responses highlighted that building codes designed for larger or commercial structures increase costs for smaller residential projects, especially missing middle housing. Respondent input related to construction standards underlines the broader theme of navigating complex regulations and a desire for practicability.

Solutions Proposed

- Classify smaller multi-unit buildings under residential codes
- Allow lower-cost alternatives, such as:
  - Residential elevators instead of commercial ones
  - Simplified fire sprinkler systems (Type 13D)
- Relax certain requirements for renovations, such as:
  - Soundproofing standards
  - Insulation upgrades when costs outweigh benefits
- Provide pre-approved building assemblies and design guidance
- Publish permit-ready plans for housing types (including prefabricated)

Housing Finance and Development Programs

Developer respondents reported challenges with state funding programs, particularly unpredictability in timelines and requirements. Programs like LIHTC and ORCA were described as complex, slow, and misaligned with project readiness and financial feasibility.

Solutions Proposed

- Improve predictability of funding timelines
- Prioritize “shovel-ready” projects
- Adjust subsidy limits to reflect current costs and support higher-density housing
- Create a state-level LIHTC to supplement federal credits
- Streamline application and assessment processes
- Expand pre-development funding support

Technical Assistance Programs

Technical assistance programs were generally viewed positively when they were well-funded and collaborative, but concerns were raised about accessibility and relevance.

Solutions Proposed

- Expand technical assistance grants and consultant support
- Tailor programs to rural and small jurisdictions
- Ensure programs are practical and aligned with real-world conditions
- Share best practices across jurisdictions

Broader Policy Critiques and Alternative Approaches

Some respondents questioned the overall structure of housing policy, arguing that market incentives, funding allocation, and regulatory philosophy may be misaligned with affordability goals.

Solutions Proposed

- Provide financial support directly to homebuyers rather than developers
- Offer tax incentives or fee waivers to stimulate development
- Reevaluate rent control and other market interventions
- Encourage community-driven and locally tailored housing solutions
- Stabilize the policy environment to reduce uncertainty

Phase I Interviews

Phase I interviews were conducted by IPRE between February – March 2026. Engagement consisted of 10 interviews with 1-3 people per interview. IPRE engaged a total of 16 individuals including State Agency Work Group Members and other agency policy and program staff. This summary synthesizes findings across all agencies.

Methods

Objectives

- Learn how agencies align housing production within mission and programs
- Collect information on recent or upcoming changes to related to housing production
- Solicit possible solutions to identified challenges and opportunities
- Collect agency perspectives on what local government and housing providers think about opportunities to reduce barriers or maximize resources

Each script was tailored to the specific agency given variability in mission and programs. A generalized script is detailed below

1. How does [agency] consider housing production within the context of your agency's key mission and programs?
   i) How has this changed over time?
2. How does [agency] consider housing production within the context of your agency's key mission and programs?
   i) How has this changed over time?
3. Has [agency] made changes in recent years to address barriers or opportunities related to housing production?
   i) (administrative or rule streamlining or flexibility, technical assistance, funding and financial programs, updated policies, others?)
   ii) If so, what was successful about those recent changes?
   iii) Unsuccessful/Lessons learned?
4. Are there other opportunities for [agency] to address housing production needs?
   i) [Streamlining, flexibility, reprioritizing, leveraging existing resources]
   ii) If yes, what resources would be needed?
   iii) Other considerations that make these more/less feasible?
   iv) If yes, is this a change that the agency can make internally? (who has the authority to enact this change?)
5. How does your agency interface with local governments and producers of housing?
6. What have local governments and housing providers shared about potential opportunities to reduce barriers or maximize the use of state resources in support of production?

7. How does [agency/program] typically work with other agencies across the state enterprise?
   i) Partnerships, program or grant administration, technical assistance
   ii) Formal/informal coordination?
   iii) Has housing-related work changed/expanded these working relationships?
   iv) Are there opportunities to improve inter-agency coordination in support of housing production?
8. Is there anything else you would like to share that I did not ask?

Phase I Interview Summary Outcomes

What's working/strategies implemented or in progress

- Use of existing fact sheets, templates, guidance
- Trainings
  - Internal trainings (DEQ, SHPO, ex. navigating complex projects, land use)
  - Cross-agency trainings (ex. DSL to OHCS)
- Program-specific newsletters or bulletins
  - ex. articulates common challenges and next steps
- SHIP actions and processes
- Early communication – applies to applicants, agency coordination, policy changes, etc.
- Regionalized approach of Regional Solutions (Regional Solutions, ODOT, DEQ)
- Shared programming, processes, or structures enable agency coordination at the program-level -
  - DSL w/ ODFW and DEQ
  - DSL inquiries from DLCD on UGB expansions
  - OHCS and OHA
  - DWS and BCD/Plumbing Board
  - DWS and DEQ on water/sewer placement for complex infill development
  - BCD and ODOE through the Construction Industry Energy Board
  - BCD authority in relation to OSHA's authority on agricultural labor housing
  - DWS and OWRD on well-drilling through a notification system, DWS verifies plan review is in process
  - OHCS and SHPO – on CDBG funds through a programmatic agreement
- Increasing agency staff capacity
  - Housing specialized, narrowed programmatic focus (DSL)
- Recent policy changes at the state level – focus on housing
  - Resulted in new programs (Biz OR)
  - New partnerships (Biz OR w/ HAPO, BCD embedded as part of HAPO)

- Already well positioned to act on/inform some issues (Biz OR on infrastructure)
- Input from key partners
  - Enabled by regional staff (Biz OR)
  - One-stop meetings (Biz OR)
  - Standing meetings with program staff (SHPO, ex. Tribal cultural resource staff)
  - SHPO-palooza prior to COVID – semi-annual convening of partners to gather input/feedback, coinciding at times with annual or semi-annual conferences
- Application processes
  - ORCA application (OHCS)
    - allows application system to adjust to new information or context
    - allows for a level of flexibility: getting every project to "yes"
    - Informed by requests from developers for a non-competitive process
  - Priority permit review enabled by check-box on applications (DSL, SHPO)
  - Exemption from full review/ different queue from other applications (OHA-DWS)
    - Ex. Oregon Very Small Systems – waives plan review few, cursory review, and approval by DWS
- State capacity at the local level
  - DWS has taken back oversight on Oregon Very Small Systems from County Health Departments to ease local capacity
  - BCD is the local-level administrator of building code in some geographies, ex. Eastern Oregon
- State-level standardized training
  - BCD handles training and certification of local building officials
- State support on local coordination
  - Ex. BESA - structure for a network of shareable capacity (BCF)
- Intra-agency coordination
  - DLCD convenes staff from different programmatic areas within the agency to strategically prioritize housing, balance with other goals, ensure that all options are being explored that keep true to the value of the land use system
- OHNA rulemaking
  - Incentivizes comprehensive thinking / building whole communities
  - Address land parcelization, vacant/partially vacant land
- Promoting programmatic agreements to streamline streamlining compliance processes (SHPO)
- Information collaboration/coordination when there is a cross-over in expertise and shared purpose (BCD
- Updates to agency plans

    - address mobility policy via the Oregon Highway Plan (ODOT)

<u>Challenges/trade-offs</u>

- Increasing complex and funding conservative environment (DEQ, Biz OR, DLCD)
    - Especially for issues related to infrastructure – limited tools at the local level
    - Limits ability to be proactive
    - New, but unanticipated, funding for the Regional Infrastructure Fund
        - Require update to the rules (Reg Sol)
- (related to mission) OHCS' mission has expanded to address more of the continuum of housing needs, including stability.
    - Has resulted in an expanded budget
    - Demand for staff capacity to run programs, allocate funds, etc.
- Agencies that administer federal programs
    - Work within federal definitions (ex. community water system – OHA-DWS)
- Trade-offs, prioritization, balancing act (DEQ, Biz OR, OHCS)
    - Impact to workflow structure (first complete app in, first out)
    - Allocation of resources (funding, staff time) – trade off with other public goals/local needs (DEQ, Biz OR), strain on resources for environmental protection and public health
- Increased need or request for interagency coordination can result in increased administrative overhead (OHCS)
    - Mismatch in language and terms, understanding of expertise makes it challenging to coordinate (OHCS, DEQ)
- <u>Application completeness</u> (DEQ, DSL, BCD, SHPO)
    - Huge time suck
    - Perpetuates frustration/misconceptions
- Concurrent review might not be the best solution if approvals are dependent – wasted time and resources for already capacity strapped staff (DEQ)
- All agencies must work within their authority and structure – manage misconceptions that create administrative burden
    - Fundamental misunderstandings on how local governments and other interested parties/partners/other agencies - interpret what that authority, structure is (DEQ)
    - Confusion on authority between state and federal when federal guidelines or laws change (DEQ
    - Confusion on how programs are designed, funding is allocated (OHCS)
    - Confusion at the local level (developers, community) on authority between BCD and local building officials (BCD)

    - DLCD - misperceptions on affordability and urban growth boundaries
    - DLCD - Limited authority to be pro-active
    - SHPO – procedural process – not regulatory agency; limited in ability to be pro-active in providing advice outside of a programmatic agreement
    - Local misinterpretation duplicating processes unnecessarily - applying mobility targets at development application AND zone change (ODOT)
- Mismatch in metrics
    - Infrastructure development/capacity is working on a longer time frame and doesn't neatly translate for a # of units (Biz OR)
- External threats
    - Federal changes (DEQ, OHCS
    - Climate change (DEQ
    - Emerging contaminants (DEQ
- Stability, capacity, governance structure at the local level affects timelines for navigating programs, permits, processes
    - Limited capacity or lack of local qualified/certified staff pushes processes to the state-level, esp. challenging for rural and/or resource strapped communities (DEQ, Biz OR
    - Staff turnover, change in elected officials impact permitting timelines (DEQ, DSL
    - Governance structures for some cities, but particularly rural communities, can affect permitting when there is responsibility for maintenance (septic, water systems, etc.) (DEQ,
    - Align requirements and realities for cities that don't have the resources to meet housing targets - work within constraints and coordinate with other agency requirements to promote the type of housing development desired, avoid perverse incentives (DLCD
        - local moratorium on wastewater policy work that would align the wastewater permit with land use outcomes that the city can achieve
    - Limited capacity to take on grants even if they could get funding (Reg Sol)
- Pace of change felt on the local level (Reg Sol)
    - Energy provisions in the building code (BCD)
- Litigation
    - Variable by community – more public opposition and public process lead to longer timelines
- Missed coordination/partnerships
    - SHPO had been written into administrative rules (for ODOE program) without any coordination with SHPO– implications for role, authority, and capacity
- Outdated data management/application system (SHPO, ODOT)

    - ODOT does not have a full inventory of the land they own, missed opportunity for sale or transfer of state land for housing, esp. land that was not captured in other efforts because it is ROW/not a parcel
- Archaeology permitting – SHPO advice to take precautions, be eligible for expedited permitting, trade-offs for development budgets on professional services
- Need to define roles and purview between Regional Solutions and HAPO
    - Concern about answer shopping
    - Administrative burden for agencies

<u>Solutions</u>

- Administrative
    - Application checkboxes, flagging priority review or capacity needs, ex. residential development, inquiries from other state agencies on behalf of applicants (DSL, DEQ, ODOT)
    - Reduce duplicative application procedures across agencies for the same project and let agencies use their relevant criteria to evaluate (DSL, DLCD
- Require funding/re-allocation of resource
    - Navigator/intermediary between local governments and state agencies – connect to appropriate resources, processes, completeness of applications (DEQ, DSL
- Provision of guidance, training, information
    - Enabling consultants working on behalf of local governments
        - Vet or certify (DEQ,
        - Training/education on completeness and timelines of applications (DSL
    - Coordination meetings with applicants, other agency staff, etc. and cut down asynchronous back and forth (DEQ,
        - – ID issues early, needs early, problem-solve early, anticipate timeline more accurately, communicate needs/requirements for permitting
    - Fact sheets and guides (DEQ,
        - Complete/successful applications
        - Challenges and solutions (ex. case studies)
    - Identify and create pre-approved criteria, plans, specs, minimums where possible (DEQ, BCD
        - Tradeoffs if requirements change, materials need to be updated
    - Improve customer service (Biz OR
- Inter-agency coordination
    - Federal changes can present an opportunity to rethink approach and look for creative solutions (DEQ)

- Research on other states - re-imagining state approach to natural resource management – overlap between agencies (DEQ)
- Data sharing
  - Sharing relevant application data early to flag issues – understanding or changing expectations with applicant of what is shared between agencies (DEQ)
- Interagency conversations/coordination - Identify where there may be issue areas within someone else's expertise
  - Cross training between agencies to help (DSL, ODOT)
  - Use what's working, ex. current models aka Regional Solutions Teams (DEQ)
  - Project huddles/pre-project meeting/more communication between staff of different agencies (DEQ, DSL)
  - Comprehensive planning on areas of shared priorities – collaborating to align and think holistically about program design (DLCD)
    - Community water needs and housing (Goal 13)
    - State transportation facilities interface with cities

- Long term planning, partnership building – talking with Tribes and other groups (SHPO)
- Rulemaking
  - DSL and DLCD on wetlands and UGB expansions
    - opportunities for uplands to development while in the process of getting LWI adopted – current rule is no development allowed
  - Rulemaking for ORS 358.653 – historic resource owned by a public entity (SHPO)
- Changes at the local level that would streamline state agency permits, processes, etc.
  - Adoption of a maintenance district in the context of cluster systems for septic (DEQ)
  - Approval, designation, or certification of staff at the local level by [relevant state agency] to process permits or applications, provide information (DEQ)
  - Advanced Aquatic Resource Planning (AARP) (DSL)
- Others/agency specific
  - Explore options for remote sensing of wetlands (DSL)
  - Biz OR is limited by statute to work only with municipalities
  - Maintaining or improving housing/Housing preservation, ex. manufactured home parks (Biz OR
  - Recent changes are difficult to see impact (BCD)
  - OPRD has committed to funding a new database system – take a few years to bring this online
  - Study of other Western SHPOs – tools that they are using that we're missing

- Other opportunities for regionalization – regional planner, infrastructure investments/facilities
- ODOT development review - opportunities to exempt some reviews to reduce duplication at the local level, ex. putting in a sidewalk
- ODOT – supporting jurisdictional transfers
- ODOT transferring state owned land from ROW

Phase II Interviews

Phase II interviews were conducted by Mosaic Resolutions, with support of HAPO staff during June 2026. IPRE drafted interview discussion topics as identified through focus group discussions and agency review of the draft report. Phase II interviews were held with the agencies listed below.

Agency	Interviewees	Date
DLCD	Madeline Phillips	Wed, June 3
ODOT	Lucia Ramirez	Wed, June 10
	Glen Bolen	
	Michael Rock	
OHCS	Michael Johnson,	Mon, June 22
	Natasha Detweiler-Dab	
	Mike Savara	
SHPO	Robert Olguin	Tues, June 23
	Ian Johnson	
DSL	Charles Redon – Removal-fill specialist	Wed, June 24
	Jevra Brown – local wetland inventories	
	Daniel Evans – Wetland delineations and determinations	
	Grey Wolf – Mitigation specialist	

Methods

Objectives

- Address research team knowledge gaps in program design and internal processes to inform report and recommendations
- Gather additional agency perspective on program-level challenges and opportunities

- Solicit possible solutions to identified challenges and opportunities, including alternative solutions and further recommendations

Phase II Interview Summaries

DLCD

Overall

- Focused on how the OHNA changes HCA capacity assumptions
- Discussed development-ready land standards
- Differences in standards for small cities
- Discussed urban reserves

BLI

- Discount capacity of that land that is restricted (deed restriction)
- BLI – DLCD has not contested one yet
- Inventory all partially vacant land
- Can use land market supply factor – take % off the top of all partially vacant land (NOT parcel by parcel)
    - Addresses likelihood of development over planning period
- Market conditions that a city might consider that would change the way capacity calculation is done(197A.270 (BLI rules)
- Rule around exceptions land – allows a city to discount land considering for inclusion if partially vacant up to 50% discount
        - When parcelized
        - If less than 5 acres, partially vacant, discount 50%

Development-Ready Land Standards

- DRL has to be annexed and served
- Will shift annexation process – more at stake ; willingness of landowner – critical path property HPS action
- Sufficiency of DRL – 660.008-180-185
- If after two cycles, the DRL does not develop because ownership, then there's discount factor for BLI – voluntary option - progressive discount; after three cycles – discounted 100% - take out of DRL (6 or 8 years)

Small Cities

- Cities not required to update HCA
- Variation in needs across small cities; OHNA allocates to all cities
- Have requirement to meet Goal 10 requirements
- Eligible for housing planning assistance, but may choose code revision instead
    - Prioritized for cities with statutory obligations

UGB Expansion

- Small cities are allowed to use one-time expansion provisions
- Exceptions lands still in priority scheme
- Refinement – prime and unique v. high value farmland (lowest priority)

Urban Reserves

- Only 8 cities outside of Metro have urban reserve
- Rulemaking related to SB 1129
- Urban reserve brought into UGB first
- When deficit, the study area could exclusively be urban reserve
- Cost as a barrier to do modeling : challenges with City/county/ neighboring utility district – participate in infrastructure planning (no city provides all of own utilities)
    - Not have level of required coordination (Goal 2 mentions)

Potential Recommendations

- Incentivize cities doing urban reserves; requirement before doing UGB amendment over a certain threshold
- Extend planning window for utilities to match lifespan at a regional scale (incentivize)
- Encourage Longer Term Infrastructure planning (50 year) for UGB expansions
- Regional Problem Solving (e.g. Coos County)
- Funding for infrastructure planning: who should pay?
    - Brought into UGB – anticipated to be developed – if putting plan designations – have some degree of certainty; not master plan or concept plan to get density/capacity
- Interagency coordination: housing types, subdivisions, e-permitting system

ODOT

Overall

- Confusion and perception are the biggest barriers, not necessarily regulations themselves.
- Mobility standards (within the Oregon Highway Plan) are widely misunderstood and inconsistently applied—especially by smaller jurisdictions.
- ODOT has limited legal authority (cannot require analyses or stop development), but its guidance strongly influences local decisions.
- Flexibility exists but creates complexity, leading to uncertainty and risk for cities.
- Transportation can enable housing, but perceived regulatory friction and design requirements can deter projects.

Mobility Standards

- Core issues
    - Many jurisdictions do not understand how OHP mobility standards work or when they apply.
    - Biggest challenges occur in small towns with state highways, where:

        - Traffic volumes exceed targets
        - Communities do not want expansion projects to fix congestion
    - Flexibility exists, but without clarity it becomes a liability.
- Flexibility Mechanisms (Not well understood)
    - Cities can:
        - Create Multimodal Mixed-Use Areas (MMAs)
        - Designate Climate-Friendly Areas
        - Rely on planned future projects (20-year horizon)
        - Use mitigation strategies (turn lanes, signals, etc.)
- Key Risks
    - Cities adopting ODOT standards directly into local code creates legal exposure:
        - Risk of lawsuits from residents (if standards violated)
        - Risk of lawsuits from developers (if permits denied)
- Potential Solutions
    - Modernize and clarify the Oregon Highway Plan (OHP)
        - New OHP update expected to introduce context-sensitive standards
    - Provide better guidance and training
    - Clearly explain how flexibility works to avoid "moving target" perceptions

<u>Traffic Impact Analyses & ODOT Authority</u>

- ODOT cannot legally require traffic analyses or enforce compliance
- Requirements typically stem from local development codes
- Developers and cities often believe ODOT requirements are mandatory, creating unnecessary friction
- Potential improvements
    - Pre-approved options that reduce need for extensive analysis
    - Would simplify decision-making for jurisdictions

<u>ODOT Development Review & Housing</u>

- ODOT's role is to review projects and suggest mitigation. ODOT cannot deny development.
- ODOT development review is still perceived as a barrier because of
    - Cost/time of required improvements
    - Complexity of highway design standards
    - Limited expertise
- Potential improvements
    - Clearer guidance and simplified engineering standards/expectations
    - Clarification on ODOT's role and authority

<u>Transportation Capacity and Infill Development</u>

- Infrastructure investments can unlock housing development
    - Example: Great Streets Program
    - Example: Division BRT corridor
- Conflict/constraints

    - Highway Design Manual vs TPR conflicts can deter projects
    - Cities may avoid projects due to fear of future ODOT approval issues
    - Transportation is not the only bottleneck
        - Sewer and water constraints are also critical
- Gap in critical data
    - ODOT lacks formal data on where capacity exists, but has informal knowledge of developable areas

<u>Funding and Policy Tools</u>

- ODOT exploring ways to leverage funding for housing
    - Immediate Opportunity Fund (economic development loans)
    - Potential housing-focused infrastructure financing tools
    - Transportation Infrastructure Bank
    - Approach is to align grant programs with housing outcomes
        - Evaluation of approach is tied to SHIP work plan
- Still a need to clarify state-level policy related to local use of exactions and SDCs – it has been unclear and inconsistent

<u>Jurisdictional Transfer</u>

- Cities may be more likely to take ownership over ODOT facilities if they receive financial and technical support

OHCS

<u>ORCA Waitlist</u>

The ORCA system is designed as a pipeline and readiness-based funding model, replacing the earlier "yes/no" of the Notice of Funding Availability (NOFO) approach. Projects enter through intake, complete an impact assessment to demonstrate alignment with state priorities (e.g., OHNA housing needs), and—if they meet the standards detailed in the ORCA manual— they are placed on a waitlist.

The waitlist depends on when the project was submitted. There are several waitlists:

- Waitlist for projects that need gap subsidy only
- Waitlist for projects that want to leverage 4% tax credits
- Regional waitlists (to provide geographic equity) – methodology for allocating funds across geography is based on OHNA and housing burden

OHCS allocates funding based on need, which is measured through the housing needs analysis (HNA).

Projects are expected to maintain readiness and meet timelines; if they cannot proceed when funding becomes available, they lose their place within the waitlist, and funds move to the next project. Projects that receive a funding reservation have specific timelines that they must meet, such as financial close within six months of the reservation, which can provide an off-ramp for stalled projects.

A central issue from the perspective of OHCS staff is that demand far exceeds available funding (approximately a $1.5 billion gap). OHCS' perspective is that development delays are largely driven by funding scarcity, not process flaws.

Frequent Misconceptions About ORCA

- Misconception that projects on the waitlist are unfeasible or that the system itself is causing delays.
  - All projects on the waitlist are required to demonstrate feasibility
- The transition from NOFO to ORCA has changed expectations: instead of receiving immediate yes/no decisions, applicants now receive conditional approval pending funding availability, which can create frustration or confusion.

Changes to ORCA – Process and Communication

- Changes are reflected in the ORCA manual; updates driven by new tools, new information, or a need to clarify processes
- Communication on changes to the ORCA manual are delivered through webinars and emails to the current waitlist. Staff working directly with applications oversee that updates to ORCA standards can be made to projects currently in the queue without triggering reapplication.
- Previous update (1.5 years ago) to geographic area was based on partner feedback about equitable distribution to rural areas
- ORCA is designed to streamline – when applicants come through ORCA, they identify the dollars needed, but not necessarily which funding source/program they think they are eligible for. OHCS does the matching. Applicants do need to provide input on whether they are looking for tax credit versus other funding types.
- OHCS works to balance flexibility with limits on cost overrun; consultation process with developer when costs exceed estimate in the application; OHCS also pushes developers to leverage state funds with other sources when possible.

Culturally Specific Organizations

- OHCS does not prioritize CSO projects; this designation is intended to provide meaningful access and correct past wrongs of housing policy.
- Some LIFT funding is set aside for CSOs, separate from prioritization
- OHCS provides capacity building grants to CSO for internal operations, other supports may include required partnerships with other groups, access to OHCS technical advisors

Prioritization Criteria into ORCA process

- Additional criteria for project readiness, and associated costs, becomes an equity issue.
- The NOFO process received criticism for applicants having to do too much/spend too much to show readiness and be competitive for funding

Subsidy Caps

- Subsidy caps are based on AMI and size of bedroom, with differences between urban and rural geographies

- In some circumstances, the subsidy can be increased by ~25% if the project meets certain criteria
- Subsidy caps are already high, set based on data
- Balancing responsible spending of public money

SHPO

National Register of Historic Places

- The National Register of Historic Places is established by National Historic Preservation Act of 1966. That is the defining document that SHPO follows. It includes four criteria that a property must meet to be put on the national register:
  - A (Event): Associated with events that have made a significant contribution to the broad patterns of our history.
  - B (Person): Associated with the lives of persons significant in our past.
  - C (Design/Construction): Embodies distinctive characteristics of a type, period, or method of construction; represents the work of a master; possesses high artistic value; or represents a significant and distinguishable entity (often architecture).
  - D (Information Potential): Has yielded, or is likely to yield, information important in prehistory or history (typically applies to archaeological sites)
- When SHPO applies standards, the fundamental question is: Why is this property important? And then review is conducted with that question in mind.

Secretary of Interior Standards

- Flexibility on interpretation depends on the project. SHPO interpretation is guided by the significance of the property and the character-defining features of the property. If the development/project doesn't affect that character, then it is more likely that SHPO would approve it.
- SHPO is not always the final authority. In some cases, NPS or federal government has final sign off.
- NPS and federal government are bound by same standards/criteria that SHPO is in review; but may interpret them differently.
- SHPO looks to the applicant/developer to provide the information upon which SHPO makes its decisions; SHPO does not do their own research or analysis on the application. SHPO may ask the applicant to provide more information or clarity.
- SHPO tries to require the lowest possible documentation necessary, to make it easier for applicants. SHPO is currently in the process of updating documents to provide more explicit guidance or answers to specific questions
- Interpretation of the standards does not change when there is a change in use of the building.
  - But a criteria for a rehabilitation project is "compatible use." NPS wants to encourage the least amount of change to an existing building, so a change in use is inherently going to be difficult because it may require lots of change to the building. For example: McMenamins, you'll see they make the least possible change to the buildings.

    - If someone is using a federal tax credit and wants to make lots of changes, it is uphill battle. Changes to a national historic landmark (top protected designation) will be looked at much more closely than a project that is listed in national register.
    - SHPO will help the developer look at options for how to make the changes they want while meeting preservation standards.
- SHPO interprets standards when:
    - If a federal tax credit is involved, SHPO is involved: we make a recommendation to federal government, and they approve or not.
    - Pass through grants from feds, SHPO is involved and make a recommendation to feds. Feds tend to give SHPO more deference when grants are involved than when tax credit is involved.
    - For compliance efforts, the federal agency determines whether or not they come to SHPO, and it can depend on several factors.
- Some local governments adopt SOI standards directly into their local code; SHPO does not advise this, and it can lead to conflicts.
    - If a property is listed on the National Register and locals have control over it – then local decisions override state determination

<u>Timing of SHPO project review/interpretation</u>

- To comply with rules, SHPO has 30 days to respond
- Some programmatic agreements that have expediated timelines – ex. emergencies or discovery of human remains
- It is up to the applicant when to submit. SHPO tends to recommend submit to us when you have a good idea of what you will do, but not too late.
    - A project can submit whenever they want. They could do so at 10% or 100% design. But we need to have a good idea of what the project/building is, so we may ask them to resubmit later ("too early problem")
    - Also have the "too late problem" – project may be in development, and something is discovered very late and is very expensive to do the mitigation.
- If applicant contacts us early: SHPO will tell them: here are some things to think about and thoughts on when to submit for ideal outcomes

<u>Tools for Developers</u>

- There is a public database with GIS map so people can see what properties are on Historic register
- We have webinar and recordings on SOI standards. This is most used by mom and pops who are applying for grants.
- There is a prohibition on sharing location of archeological sites, so that is harder to share publicly. Only qualified archaeologists and approved professionals can access the info.
- There is opportunity for additional trainings. We add online seminars and guidance documents as we can: for example, doc on building housing.

- We don’t have anything specific on website like a flowchart for “you may want to speak to SHPO early when….”

<u>Staff capacity/authority</u>

- 4 staff cover the thousands of compliance projects that come in every year.
- Interpretation has become more conservative, ask: what are we preserving, for whom, and for what?
- In any process there may be a 3rd party wildcard: the public, fed agency that has a role, or external council that may touch the project, and they also can provide interpretation or change the result.
- SHPO also doesn’t always have the final say: we make recommendations and approvals, but they can often be overridden when federal partners have some authority or if locals have jurisdiction.

DSL

<u>Delineation</u>

- Valid for five years; eligible to be renewed for another five years if there have been no surrounding land use changes
    - If they are reissued, then a reissuance request comes in from applicant to extend for another 5 years. The level of effort to do the reissuance is much lower than original delineation
- On tracking timeline for process: DSL prepares an annual report with key performance measures; available online
- DSL has 120 days to do the initial completeness review (120 days from submission of delineation request/payment to issuing a completeness determination). This is a statutory timeline. Beyond this, there are no mandated timelines.
    - Completeness review usually took 60 days before COVID, and now more like 90-120 days. A key issue that makes the process take longer is lack of staff. DSL has been asking for more staff to help. Work has doubled; recently brought on a new staff to do more work.
- There are lots of nuances to how long it takes to do the actual delineation. Experienced consultants make a big difference; if they provide bad information, it takes longer.
- After the review, DSL issues either: 1) Concurrence and the delineation is good for five years; or 2) A request for more information needed to meet standards for concurrence.
- On tools/data to increase awareness of land constraints and delineation
    - Additional resources into LWIs would be very helpful. The legislature sometimes provides DSL with money to provide technical assistance grants to local jurisdictions to develop LWIs. But haven’t gotten many grants in last 15 years; and cities have not done their LWIs. With passage of SB 1537 have recognized need

for the funding source; so the funding sources HAVE increased, and local governments have been jumping on the opportunity for these grant sources.
    - LWIs are amazing resource for people to get info about wetlands on their own; and really cuts down on requests for DSL to review lands for wetlands
    - An online web map showing LWIs became available online in the last 5 years, which immediately cut down the number of phone calls DSL received from developers/public asking whether they have wetlands on their property.
        - DSL leads trainings for realtor groups to understand the web map. (DSL offers other trainings on how to coordination with DSL and the basics of DSL regulations.)
    - Note that LWI are for planning purposes only; they do not show wetlands to the accuracy needed for permitting purposes. They are estimates, but not exact boundaries. For a permit, need to have the exact wetland boundaries delineated. That's why additional analysis is needed at permitting stage: LWI is not enough.
        - **If developers see LWIs as a tool that should be sufficient for permitting, that is an incorrect perception. Need more education on what the tool really is. It is a planning tool—not a permitting tool.**

<u>Mitigation Policies</u>

- Clear from interested parties that there is not enough mitigation available. The biggest barrier is that DSL does not have the staff to expand mitigation. DSL only has 2 staff that do mitigation banks and payment in lieu programs. It is a bottleneck in capacity issue; asked for more staff in last legislative cycle, didn't get it.
- Mitigation Banks
    - Mitigation banks are economic ventures. They are usually created by a private or public entity (municipality, LLC, farmer) who has land they want to put in a bank. DSL only controls the review and approval of banks; *DSL does not do the upfront creation of banks.*
    - Mitigation Banks Map showing existing Banks with their service areas: https://www.oregon.gov/dsl/wetlands-waters/Pages/mitigation-banks.aspx
        - Mitigation bank map available on website
    - Municipalities often want to creation mitigation banks; and DSL works with them regularly to help them do so. DSL provides guidance on creating mitigation banks; and also offers standing monthly pre-mitigation bank meetings to help the interested party
    - There are not a lot of limits on <u>who</u> can set up a bank; a bank sponsor just needs to be someone who can fulfil the obligations of the mitigation bank instrument
    - DSL has heard that cost of mitigation bank credits is very high. The cost of mitigation bank credits is controlled by the sponsor itself; not controlled by DSL. The sponsor can set their own credit prices, and change them as they want.
    - **Multi-purpose mitigation banks**
        - DSL can consider these, and there are some multi-benefit mitigation banks in Oregon. There can be some big, great projects when multiple benefits

        are considered. Grey Wolf at DSL has a lot of lessons learned from doing multi-benefit mitigation banks.
        - There can be problems with credit stacking. If you stack lots of credits onto a single area, can lessen the value. A better way to do the multi-purpose mitigation is by designating different parts of the site and assigning a different type of credit to each.

- Payment in Lieu
    - DSL could expand PIL options if they had more staff – this is the critical piece.
    - DSL is the only entity in Oregon that currently sponsors a PIL program, but other entities can do so as well.
    - Developers like to do PIL over mitigation bank projects because DSL cannot get profit off our PIL program. So it is usually a "cheaper" option to developers as compared to mitigation banking.
    - Additionally, the PIL offers developers advanced release of credits even without a mitigation project in mind. This is different than how mitigation bank works. There is a statutory timeline: a mitigation project must be built within 3 years of release of the advanced credits.
- Removal Fill
    - An alternatives analysis is required by law in order to derive the practicable alternative and still meet the purpose of the project while having least impact to waters of state
        - For example, a purpose could be "getting x houses on the ground"
        - There is no formula for the analysis; it is based on "what is the purpose." If purpose is "entry level housing in West Eugene", then that is what the analysis is based on.
        - Need a clear purpose statement to allow for looking at a reasonable range of alternatives.
        - There are no criteria that requires looking outside of UGB in the analysis. And in most housing cases, land outside UGB won't meet the purpose.
        - <u>Solution</u>: increased training for DSL staff and applicants/their consultants in understanding how to do the alternatives analysis. Want to make sure applicants are not getting mixed guidance. They need to know about the importance of a clear purpose statement.

<u>Litigation/Contested Cases</u>

- Who can file? - the permittee or person who got permit request denied can file. Also, any person who commented during public comment period can contest (they are considered an "aggrieved party").
    - This is laid out in law/Administrative Procedures Act
    - Only valid requests move forward into the hearings process. DSL reviews the requests. If the request is not valid, then the delays process would just be a few days or weeks while DSL evaluates the request.

- What is the process and the timeline? – This is a court proceeding, and the timing depends. This may include several months. Could be over a year if go through full hearings process. ALJ hears the case.
    - A contested case hearing is not really a DSL staff issue; it is a legal issue.

Public Comment

This will summarize the process and outcomes of the public review of the draft report.

Part E: Recommendations

Recommendations Included in Report

The following table includes recommendations included in chapters 3, 4, and 5 of the report and is organized by topic. This table provides details about potential impacts to housing production and timeline and difficulty of implementation.

Chapter 3: Policy and Program Analysis – Regulations and Permitting

Land Use Planning Requirements and Land Availability and Readiness

Recommendation	Description	Agency	Type of Recommendation	What Problem Does This Solve?	Relationship to Housing Production	Timeframe	Magnitude	Geography	Kind of Housing
Adjust planning horizons in HCA	Adjust the required planning horizon from 20 to 30 years to reduce the frequency of UGB expansions and allow time for functional planning for infrastructure provision.	DLCD	Statute; Rulemaking	Shorter planning horizons require more UGB expansions, which can strain local capacity .	Complexity, time, cost	Medium	Low	Statewide	All

Recommendation	Description	Agency	Type of Recommendation	What Problem Does This Solve?	Relationship to Housing Production	Timeframe	Magnitude	Geography	Kind of Housing
Revise rules governing Buildable Land in Chapter 660 Division 8 to exclude or discount certain wetlands	Revise rules governing buildable lands inventories to exclude or discount both locally significant and non-significant wetlands regulated by DSL to better reflect actual development constraints. Consider a discount approach for potentially regulated wetlands or waters as determined by DSL.	DLCD, DSL, Legislature	Rulemaking	Current definition of buildable land may overestimate land availability by including wetlands regulated by DSL, which are often difficult and costly to develop or mitigate. In practice, many local governments may discount DSL regulated wetlands already in their BLI.	Complexity	Medium	Medium	Statewide	All
Incentivize cities to designate urban reserve areas (URAs)	Encourage cities to adopt urban reserves and exempt those with URAs from the full alternatives analysis. Provide priority access to infrastructure funding for cities with urban reserves.	DLCD	Statute, Rulemaking	Encourages forward-thinking considerations about UGB expansions and urbanizable land to simplify and streamline the process.	Complexity, time, cost	Medium	Medium	Statewide	All
Fund UGB Expansion Area Planning Grants	Continue grants funding comprehensive planning for newly added UGB land; re-authorize for the next biennium.	DLCD; Legislature	Legislative	Cities struggle to complete planning and infrastructure investment steps needed to make newly added UGB land development-ready.	Complexity, time, cost	Short	Medium	Statewide	All

Recommendation	Description	Agency	Type of Recommendation	What Problem Does This Solve?	Relationship to Housing Production	Timeframe	Magnitude	Geography	Kind of Housing
Promote greater efficiency and better ensure suitable land is included to accommodate needed housing types under future UGB expansions	Revise the priority scheme and/or locational factors to exclude "exceptions lands" as suitable for higher density and lower cost housing types. Examples to implement this recommendation may include acreage limits, sunset provision or extraordinary need thresholds. Note: Cities would still need to demonstrate housing need as required under existing rules before utilizing this revised approach.	DLCD, Legislature	Statute; Rulemaking	Current priority scheme may result in UGB expansions into lands that are unlikely to develop at urban densities and may be unsuitable for needed housing types.	Complexity, time, cost	Medium	Medium	Statewide	All
Provide resources for jurisdictions on application checklists and processes	Offer multiple examples of standardized application process checklists to help local governments standardize land use application procedures and guidance.	DLCD, Local	Administrative; Rulemaking	Inconsistent local intake and completeness review processes can create confusion and repeat review cycles.	Complexity, time	Medium	High	Statewide	All
Simplify and support local implementation of housing-related legislation and rulemaking	Provide expanded support—including funding, technical assistance, and staff training resources—to help local governments keep development codes current and staff trained on recent legislative and rulemaking changes.	Legislature, DLCD	Statute; Rulemaking; Technical Assistance	The volume and complexity of recent housing legislation exceed the implementation capacity of many local governments.	Cost, complexity, time	Short–Medium	High	Statewide	All

Recommendation	Description	Agency	Type of Recommendation	What Problem Does This Solve?	Relationship to Housing Production	Timeframe	Magnitude	Geography	Kind of Housing
Use a regional approach to providing technical capacity	Fund a pilot program for shared regional planner positions to extend technical assistance to smaller cities and rural jurisdictions lacking full-time specialized planning and legal staff.	DLCD	Administrative; Statute	Smaller jurisdictions lack the staff capacity to implement complex state housing requirements or access available programs.	Complexity, time	Medium	High	Rural, Cities <10K	All

Design and Construction Review and Approval

Recommendation	Description	Agency	Type of Recommendation	What Problem Does This Solve?	Relationship to Housing Production	Timeframe	Magnitude	Geography	Kind of Housing
Create brochure-quality user guides for specific housing types*	Develop user-friendly guides (e.g., for two-story duplexes) with examples, checklists, and best practices. Explain differences in definitions between DLCD and BCD.	DCBS, DLCD	Technical Assistance	Building codes applicable to middle housing are difficult for housing producers to understand and apply consistently.	Complexity	Short	Medium	Statewide	All
Expand use of statewide interpretations and technical bulletins*	Issue additional statewide bulletins related to plex, multi-unit, manufactured (site related), and modular housing.	DCBS	Administrative	Inconsistent local interpretation of building codes adds uncertainty and cost for housing producers.	Complexity	Short	Medium	Statewide	All

Recommendation	Description	Agency	Type of Recommendation	What Problem Does This Solve?	Relationship to Housing Production	Timeframe	Magnitude	Geography	Kind of Housing
Postpone adopting additional mandatory energy efficiency goals beyond HB 3409	Temporarily pause legislation that would require additional energy code updates to meet efficiency targets.	DCBS	Rulemaking; Administrative	Recent energy code updates have increased construction costs before prior changes were fully absorbed.	Cost	Short	High	Statewide	All
Apply ORSC to 3-4 unit buildings instead of OSSC*	Extend residential code guidance to stacked and attached duplexes, triplexes, quadplexes, and sixplexes, following examples in Alaska, North Carolina, and Utah.	DCBS, Legislature	Statute	Current commercial code classification increases cost and complexity of permitting middle housing types.	Cost, complexity	Medium	High	Statewide	Middle Housing
Expand permit-ready plans program to additional housing types*	Expand pre-approved building plans to include middle housing (plexes, townhouses, cottage clusters), wood-framed multi-unit buildings that can move directly to permit.	DCBS, Legislative	Statute;	Repetitive plan review adds time and cost to producing common housing types that could instead use standardized, pre-reviewed designs.	Time, complexity	Medium	Medium	Statewide	All
Assess existing master planning programs	Review master plan review program to determine if there is a process barrier to expanded use. Engage directly with builders.	DCBS	Administrative; Technical Assistance	Per-project permitting burden and unpredictability reduce housing production efficiency for phased developments.	Complexity, time	Medium	Medium	Statewide	Middle and Multi-unit

Recommendation	Description	Agency	Type of Recommendation	What Problem Does This Solve?	Relationship to Housing Production	Timeframe	Magnitude	Geography	Kind of Housing
Delay next building code cycle for 6 years	Postpone ORSC and OSSC building code updates to 2031 to provide temporary reprieve for cities and producers of housing.	DCBS, Legislature	Statute; Administrative	Local staff and producers are struggling to keep up with frequent changes to building codes.	Complexity, time	Medium	Medium	Statewide	All

Wetlands Regulations and Incentives

Recommendation	Description	Agency	Type of Recommendation	What Problem Does This Solve?	Relationship to Housing Production	Timeframe	Magnitude	Geography	Kind of Housing
Increase period delineation report findings are valid.	Revise the period delineation report findings are valid from five years to ten to make the provisions of OAR 141-090-0045(4) automatic rather than require reissuance.	DSL	Rulemaking	Approved delineation report findings are typically valid for five years unless new information necessitates for revision. Delineations are timely and expensive, and extending their expiration date would prevent the need for restarting the process.	Time, cost	Short	Medium	Statewide (primarily Willamette Valley & Coast)	All

Recommendation	Description	Agency	Type of Recommendation	What Problem Does This Solve?	Relationship to Housing Production	Timeframe	Magnitude	Geography	Kind of Housing
Revise process for alternatives analysis in removal-fill permits	For projects proposed within a UGB, ensure alternatives analysis for removal-fill permits does not consider land outside the UGB or land that is not development-ready. The alternatives analysis must fully consider land inside the UGB that can be redeveloped.	DSL, Legislature	Rulemaking	Current alternatives analysis may require consideration of non-viable sites, increasing process burden without meaningful environmental benefit.	Complexity, cost, time	Medium	Medium	Statewide (primarily Willamette Valley & Coast)	All
Encourage mitigation banks to serve multiple purposes	Encourage multi-purpose mitigation banks funded by multiple activities (wetlands, stormwater, recreation, flood control). Consider allowing detention ponds to serve dual mitigation and stormwater management purposes.	DSL, Legislature	Statute; Rulemaking	Limited mitigation opportunities and high credit costs create cost and feasibility barriers for housing development.	Cost, complexity	Long	Medium	Statewide (primarily Willamette Valley & Coast)	Greenfield, Infill
Encourage a broader set of mitigation partners	Encourage creation of new mitigation banks run by local governments, universities, tribes, Soil & Water Conservation Districts, flood control districts, and nonprofits. Assess opportunities to increase coordination among mitigation partners.	DSL	Administrative	The limited pool of mitigation partners restricts supply and sustains high mitigation credit costs.	Complexity	Long	Medium	Statewide (primarily Willamette Valley & Coast)	Infill

Recommendation	Description	Agency	Type of Recommendation	What Problem Does This Solve?	Relationship to Housing Production	Timeframe	Magnitude	Geography	Kind of Housing
Expand opportunities for monetary investment in wetland preservation (Payment-in-Lieu)	Expand Payment-in-Lieu options to allow developers to pay fees to state agencies that own wetlands to fund ecological improvements, creating an additional mitigation pathway.	DSL, Legislature	Statute; Administrative	Current mitigation options are limited and costly; expanding Payment-in-Lieu pathways would improve feasibility for housing on wetland-adjacent sites.	Cost, complexity	Long	Medium	Statewide (primarily Willamette Valley & Coast)	Greenfield, Infill
Provide examples and fact sheets to describe the review and approval processes	Provide case studies, fact sheets, and example applications to support the wetland permit application process and reduce consultant dependency.	DSL	Technical Assistance; Administrative	Navigating the wetlands permit process is complex; better resources would improve application completeness and reduce review cycles.	Complexity	Short	Low	Statewide	Greenfield, Infill
Expand opportunities for non-wetland uplands development during LWI adoption	Allow development to proceed in uplands areas while a Local Wetlands Inventory is being adopted, based on wetland determinations.	DSL, DLCD	Rulemaking	LWI adoption timelines delay housing development in urbanizing areas where uplands locations are already known to be developable.	Time, cost	Medium	Medium	Statewide (primarily Willamette Valley & Coast)	Greenfield, Infill

Recommendation	Description	Agency	Type of Recommendation	What Problem Does This Solve?	Relationship to Housing Production	Timeframe	Magnitude	Geography	Kind of Housing
Advanced Aquatic Resource Planning in areas planned for development or UGB expansion	Encourage AARP at the local level to enable system-wide thinking about wetlands protection and mitigation opportunities. Target unannexed areas, large undeveloped areas with wetlands within existing UGBS and UGB expansion areas.	DSL, DLCD	Technical Assistance; Administrative	Project-by-project wetland review creates uncertainty for housing producers; earlier system-level data would reduce costs and delays.	Complexity, cost, time	Medium	Medium	Statewide (primarily Willamette Valley & Coast)	Greenfield, Infill
Revise mitigation guidelines for ratios and Payment-in-Lieu thresholds	Consider a system that treats wetlands based on ecological value. For certain wetlands with lower ecological value, revise mitigation thresholds to ensure no-net-loss while reducing total mitigation required. Reduce the Payment-in-Lieu threshold for lower-quality wetlands.	DSL	Rulemaking; Administrative	Current mitigation ratios for lower-value wetlands increase housing development costs without proportionate environmental benefit.	Cost	Medium	Medium	Statewide (primarily Willamette Valley & Coast)	Infill
Encourage cities to adopt and update Local Wetlands Inventories with incentives	Continue providing technical assistance and funding for cities adopting and updating LWIs. Promote LWIs as a planning-stage tool for identifying wetland locations. Provide expedited review for removal-fill for non-locally significant wetlands for cities with an LWI.	DLCD, DSL	Administrative; Legislative	Without LWIs, wetland locations are uncertain until project-level review, creating late-stage surprises for housing producers.	Complexity, time	Medium	High	Statewide (primarily Willamette Valley & Coast)	Greenfield, Infill

Historic Preservation and Cultural Resources Review

Recommendation	Description	Agency	Type of Recommendation	What Problem Does This Solve?	Relationship to Housing Production	Timeframe	Magnitude	Geography	Kind of Housing
Publicize SHPO training for local governments	Publicize SHPO annual training for local staff on changing requirements and archaeology, and promote specific federal trainings related to historic preservation.	OPRD	Technical Assistance	Local government staff and housing producers are often unaware of available SHPO training resources.	Complexity, time	Short	Medium	Statewide	Infill
Share federal guidance on navigating hazardous material abatement processes (radon, lead)	SHPO and DLCD publicize guidance and HUD trainings to help developers understand HUD environmental review for lead and radon.	OPRD, DLCD	Technical Assistance; Administrative	Housing producers lack knowledge about current HUD environmental review requirements for common conditions in older buildings.	Complexity	Short	Medium	Statewide	All
Engage with Tribal Government partners on fast-tracking archaeological permitting	Explore changes to when applicants are eligible for expedited archaeological permitting for projects with a qualified archaeologist and Inadvertent Discovery Plan; consider cultural survey exemptions for low-likelihood sites; develop solutions in alignment with Tribal Government processes and priorities.	OPRD, Legislative Commission on Indian Services	Rulemaking; Statute	Archaeological review adds time and cost to housing projects, but solutions must be developed in a way that respects tribal cultural resource priorities.	Time, cost	Medium	Medium	Statewide	All

Recommendation	Description	Agency	Type of Recommendation	What Problem Does This Solve?	Relationship to Housing Production	Timeframe	Magnitude	Geography	Kind of Housing
For state projects, change definition of archaeological resources to exclude buried infrastructure	For projects without federal involvement or subject to local landmarks board review, exclude infrastructure meeting the state definition of an archaeological site (tracks, sidewalks, etc.) from permitting review.	OPRD, Legislature	Statute	Common buried infrastructure is routinely flagged in archaeological review, consuming state review capacity without commensurate preservation benefit.	Time, cost	Long	Medium	Statewide	All
Create administrative rules for built environment historic resources under ORS 358	Expand administrative rules to address gaps in processes applicable to above-ground historic resources.	OPRD	Rulemaking	Gaps in administrative rules for above-ground historic resources create uncertainty in development review.	Complexity, risk	Medium	Medium	Statewide	All
Study legality of reducing duplicated reviews through local/state agreements	Study whether review authority can be delegated to local historic preservation ordinances under SHPO agreements to eliminate duplicative review, using the Special Assessment program as a model.	OPRD, Local	Administrative	Simultaneous local and state historic review adds time and cost where local ordinances may already provide equivalent protection.	Time, complexity	Medium	High	Statewide	All

Recommendation	Description	Agency	Type of Recommendation	What Problem Does This Solve?	Relationship to Housing Production	Timeframe	Magnitude	Geography	Kind of Housing
Utilize SHPO inventory to identify areas with potential historic and cultural resources	Work with the development community to encourage use of the SHPO inventory for initial evaluation of historic and cultural resources. Produce updated GIS layers from the database to make information more accessible.	OPRD	Administrative	Applicants often encounter historic resource requirements late in the development process, when modifications are more costly.	Complexity, cost	Short	Medium	Statewide	All

Infrastructure Capacity (Transportation, Stormwater, Drinking Water, Wastewater)

Recommendation	Description	Agency	Type of Recommendation	What Problem Does This Solve?	Relationship to Housing Production	Timeframe	Magnitude	Geography	Kind of Housing
Jurisdictional transfer of state roads to local governments	Facilitate transfer of certain state-owned roads to local governments to streamline development review, eliminate duplication, and align road management with local land use goals. Transfer facilities before redesign so local standards apply.	ODOT, Local, Legislature	Administrative; Statute	ODOT mobility standards applied to state roads create additional review requirements that delay housing development.	Complexity, time	Long	Medium	Statewide	All

Recommendation	Description	Agency	Type of Recommendation	What Problem Does This Solve?	Relationship to Housing Production	Timeframe	Magnitude	Geography	Kind of Housing
Clarity around design standards and stormwater requirements	DEQ issues consistent statewide guidance on key terms and standards. Require all local jurisdictions to publish current design standards and stormwater requirements on their websites.	DEQ, Local, Legislature	Statute; Administrative	Producers of housing face difficulty understanding which local regulations apply, where to find them, and inconsistent terms and standard across communities.	Complexity	Short	Medium	Statewide	All
Clarify when ODOT Mobility Standards apply	Clarify when ODOT mobility standards apply versus local mobility standards to reduce confusion and delay in development review.	ODOT, DLCD	Administrative; Technical Assistance	Uncertainty about whether transportation capacity barriers are due to local or state regulation creates unpredictability for housing development.	Complexity, time	Short	Medium	Statewide	All
Coordinate with local governments about ODOT plans for state transportation facilities	Where ODOT facilities are adjacent to land zoned for housing, work with local jurisdictions to coordinate Oregon Highway Plan mobility targets with allowed zoning.	ODOT	Rulemaking; Administrative	Misalignment between ODOT facility plans and local zoning creates regulatory barriers to housing development.	Complexity, time	Medium	Medium	Statewide	All

Recommendation	Description	Agency	Type of Recommendation	What Problem Does This Solve?	Relationship to Housing Production	Timeframe	Magnitude	Geography	Kind of Housing
Support neighborhood- and district-level stormwater facilities for infill	Provide support for developing neighborhood- and district-level stormwater facilities to serve infill lots where individual on-site management is prohibitively costly or technically difficult.	DEQ, DLCD, Local, Legislature	Administrative; Statute	Infill development is stalled in many locations by the cost and difficulty of meeting on-site stormwater requirements.	Cost, complexity	Medium	High	Statewide	Infill
Update EDU calculation for jurisdictions with development moratoria	Study and update the Equivalent Dwelling Unit calculation to be tailored to unit type rather than consistent across all cities and unit types.	DEQ	Rulemaking	Outdated EDU calculations contribute to infrastructure moratoria that prevent housing production in communities with capacity constraints.	Time, cost	Long	High	Cities with wastewater moratoria	All
Provide technical assistance for infrastructure planning	Expand technical assistance for infrastructure master planning to ensure a 10-year land supply of serviced, development-ready land.	DLCD, HAPO, Legislature	Legislative	Many jurisdictions lack the planning capacity to move land from unserviced to development-ready status, limiting housing supply.	Time, complexity	Long	Medium	Statewide	All

Chapter 4: Policy and Program Analysis: Funding

Affordable Housing Funding and Support

Recommendation	Description	Agency	Type of Recommendation	What Problem Does This Solve?	Relationship to Housing Production	Timeframe	Magnitude	Geography	Kind of Housing
Work directly with developers on MIRL	Restructure MIRL so OHCS works directly with developers rather than through local government intermediaries. Allow local governments to authorize participation via resolution instead of ordinance.	Legislature	Statute	Local government complexity and resistance to MIRL participation limits program uptake and slows affordable housing production.	Cost, complexity, time	Medium	High	Statewide	Affordable
Legislative investments should include prioritization criteria for ORCA project selection	Establish clear prioritization criteria for ORCA to improve predictability for developers, including OHNA housing need and feasibility criteria developed under Section 16.	OHCS	Legislative	Lack of transparent ORCA prioritization creates uncertainty for developers and may not direct limited funding to highest-need projects.	Complexity	Short	Medium	Statewide	Affordable
Add state funding as a tiebreaker criteria to relevant funding programs	Add "state funding" to the existing list of tiebreaker criteria that OHCS uses when receiving multiple competitive or same day applications.	OHCS	Administrative	There is not an existing process for certain OHCS programs to leverage funding from across the state enterprise.	Cost, complexity	Short	Medium	Statewide	Affordable

Recommendation	Description	Agency	Type of Recommendation	What Problem Does This Solve?	Relationship to Housing Production	Timeframe	Magnitude	Geography	Kind of Housing
Increase clarity about subsidy limits and per unit cost caps by development type	Increase access to information related to subsidy caps and per unit cost based on type of development (new construction vs. rehabilitation vs. acquisition); Include methods that determine amounts.	OHCS	Administrative	Developers lack clarity on how decisions about how subsidy limits and caps on per unit costs are determined and when they apply.	Cost, complexity	Short	Medium	Statewide	Affordable
OHCS use strategic plan to communicate how it operationalizes developer feedback	Continue OHCS input sessions with housing producers and demonstrate responsiveness through the strategic plan and program design.	OHCS	Administrative	Developers report providing feedback to OHCS without visible changes to programs, reducing trust in the input process.	Complexity	Short	Medium	Statewide	Affordable
Expand predevelopment and pre-acquisition funding	Increase funding within OHCS predevelopment programs earlier in the development cycle. Provide loan programs available before site control is established to enable affordable housing developers to compete in fast-moving land markets.	OHCS, Legislature	Statute; Administrative	Affordable housing developers cannot access funding early enough in the development cycle to compete with market-rate developers for sites.	Cost, risk	Medium	High	Statewide	Affordable

Recommendation	Description	Agency	Type of Recommendation	What Problem Does This Solve?	Relationship to Housing Production	Timeframe	Magnitude	Geography	Kind of Housing
Collect data on construction start and completion for projects utilizing OHCS funds	Produce a construction report that collects data on time from funding allocation to construction start and certificate of occupancy. Identify challenges that developers face to control for issues earlier in the process.	OHCS	Administrative	Limited data available for construction completion that could inform early support or technical assistance or provide additional context on project feasibility	Cost, complexity	Short	Medium	Statewide	Affordable
Establish agreement between OHCS and DEQ related to Phase I review	OHCS and DEQ develop a programmatic agreement for DEQ to review Phase I environmental assessments as part of the ORCA process.	OHCS, DEQ	Administrative	Separate Phase I review by DEQ adds time and coordination burden to affordable housing project approvals.	Complexity, time	Medium	Medium	Statewide	Infill

Infrastructure Funding Programs

Recommendation	Description	Agency	Type of Recommendation	What Problem Does This Solve?	Relationship to Housing Production	Timeframe	Magnitude	Geography	Kind of Housing
Expand eligibility in infrastructure funding programs	Remove or revise eligibility restrictions that exclude infrastructure providers or private and nonprofit developers from certain programs where federal law does not prohibit. Encourage public entities to work with private and nonprofit developers through programs like the Housing Infrastructure Financing Program	OHCS, Business Oregon, DLCD, ODOT	Statute; Rulemaking	Eligibility rules for infrastructure programs limit who can access funding, reducing the pool of projects that can move forward.	Cost	Medium	Medium	Statewide	Greenfield
Reform TIF statutes	Oregon's Urban Renewal statutes currently require a declaration of blight for TIF use. Reform statutes to allow TIF for infrastructure provision in areas without blight findings.	Legislature	Statute	The blight requirement limits the geographic reach of TIF as an infrastructure financing tool, excluding many areas where housing investment is needed.	Cost	Medium	Medium	Statewide	All
Harness expertise of nonprofit and private developers in program design	Leverage developers' knowledge of program gaps when designing or redesigning infrastructure funding programs, particularly where local government experience with infrastructure provision is limited.	Business Oregon, DEQ, DWS	Administrative	Infrastructure programs designed without input from developers may not address real-world barriers to housing production.	Complexity	Short	Medium	Statewide	All

Recommendation	Description	Agency	Type of Recommendation	What Problem Does This Solve?	Relationship to Housing Production	Timeframe	Magnitude	Geography	Kind of Housing
Expand Housing Infrastructure Financing Program	Expand the Business Oregon Housing Infrastructure Finance Program to provide additional funding for housing-related infrastructure.	Business Oregon, DLCD, Legislature	Statute; Technical Assistance	Demand for housing infrastructure funding exceeds current program capacity, limiting the number of shovel-ready projects that can move forward.	Cost, complexity	Medium	High	Statewide	All
Further prioritize housing-related projects for ODOT funding	Based on the SB 1537 infrastructure evaluation, give scoring preference to housing-related projects for TGM, Quick Response, and other large-scale ODOT infrastructure funding.	ODOT, DLCD	Administrative	Transportation funding decisions are not consistently aligned with housing production goals, missing opportunities to invest in infrastructure that unlocks housing supply.	Time	Short	Medium	Statewide	All
Audit use of existing infrastructure funding sources and revise program terms to facilitate use	Identify undersubscribed funds including the Transportation Infrastructure Bank and others. Partner with agencies to do outreach to potential users and consider adjusting financing provisions to encourage use.	Business Oregon, ODOT	Technical Assistance	Available infrastructure funding is undersubscribed because potential users are unaware of it or find program terms unattractive.	Cost	Medium	Medium	Statewide	All

Recommendation	Description	Agency	Type of Recommendation	What Problem Does This Solve?	Relationship to Housing Production	Timeframe	Magnitude	Geography	Kind of Housing
Publicize training for cities and housing producers on how to apply for state infrastructure funding	Publicize technical assistance and training from Regional Solutions, RCAC, and agency-specific sources so cities can more effectively access HIFP and similar programs.	Business Oregon, Regional Solutions	Technical Assistance	Many local governments and housing producers are unaware of available infrastructure funding sources or how to apply for them.				Statewide	All

Chapter 5: Priority Recommendations

Recommendation	Description	Agency	Type of Recommendation	What Problem Does This Solve?	Relationship to Housing Production	Timeframe	Magnitude	Geography	Kind of Housing
Re-authorize the Housing Infrastructure Finance Program	Between 2024–2025 the legislature passed four bills that provided funding for housing-related infrastructure; re-authorization would continue this support.	Legislature, Business Oregon	Legislative	Infrastructure gaps block housing supply on otherwise buildable land.	Cost	Short	High	Statewide	All
Use Readiness to Target State Funding Under Non-Federally Restricted Programs	Create funding preferences across multiple housing and infrastructure programs using project readiness indicators: funding sufficiency, design completion, site control, and permitting feasibility.	Business Oregon, DLCD, ODOT, OHCS	Administrative	Limited state resources are spread across early-stage projects that may not convert to housing within the investment horizon.	Cost, complexity, time	Short	High	Statewide	All

Recommendation	Description	Agency	Type of Recommendation	What Problem Does This Solve?	Relationship to Housing Production	Timeframe	Magnitude	Geography	Kind of Housing
Provide a Centralized Process for State Permitting	Direct HAPO to coordinate with other state agencies on a framework for concurrent permitting for housing developments.	Regional Solutions, HAPO, ODOT, DEQ, OHA, DSL	Administrative; Statute	Housing producers navigate separate, sequential review processes across multiple state agencies, adding time and cost.	Complexity, time	Medium	High	Statewide	All
Prioritize Housing Projects for Permit Review	Add checkboxes, designations, or queue management systems within state agency permitting workflows to elevate residential development projects for priority review.	DSL, SHPO, DEQ, ODOT, OHA	Administrative	Housing projects compete with commercial and industrial applications for limited state agency review capacity without explicit prioritization.	Time	Short	Medium	Statewide	All
Create Permit-Ready Plans for Additional Housing Types	Extend the Oregon Residential Specialty Code to stacked and attached duplexes, triplexes, quadplexes, and sixplexes, moving them from the commercial code (OSSC) to the residential code (ORSC).	DCBS	Administrative. Legislative	Applying commercial-grade code to small multifamily buildings significantly increases per-unit construction cost and complexity.	Cost, complexity	Medium	Medium	Statewide	Middle Housing
Apply Residential Building Code (ORSC) to 3–6 Unit Buildings Instead of the OSSC	Expand the pre-approved building plans program to include middle housing types, wood-framed multi-unit buildings, and plans meeting accessible standards (UFAS, ANSI).	DCBS, DLCD	Administrative, Legislative	Repetitive plan review adds time and cost to producing common housing types that could use standardized, pre-reviewed designs.	Time, complexity	Medium	Medium	Statewide	Middle Housing, Multi-unit

Recommendation	Description	Agency	Type of Recommendation	What Problem Does This Solve?	Relationship to Housing Production	Timeframe	Magnitude	Geography	Kind of Housing
Provide User Guides and Statewide Interpretations to Clarify Building Code for Middle and Multi-Unit Housing	Develop and widely distribute user-friendly guides for specific housing types and additional statewide technical bulletins to reduce local variation in code interpretation.	DCBS, DLCD	Technical Assistance; Administrative	Building codes applicable to middle housing are difficult for producers to understand and are applied inconsistently across jurisdictions.	Complexity	Short	Medium	Statewide	Middle Housing, Multi-unit
Prioritize State Funding for Housing and Infrastructure for Needed Housing	Create funding preferences across housing/infrastructure programs using indicators for needed housing (multi-unit, middle, affordable), where not federally restricted.	HAPO, Business Oregon, ODOT, OHCS, DEQ, OHA-DWS	Legislative, Administrative	Limited state resources should align with the state's greatest housing need (multi-unit, middle, and affordable housing).				Statewide	Middle Housing, Multi-Unit, Affordable
Expand Wetland Mitigation Purpose and Partnerships	Encourage multi-purpose mitigation banks, expand Payment-in-Lieu options, and grow the pool of mitigation bank sponsors to increase supply and reduce credit costs.	DSL, DLCD, Legislature	Statute; Rulemaking; Administrative	Limited mitigation options and high credit costs create cost and feasibility barriers for housing development on wetland-adjacent sites.	Cost, complexity	Long	Medium	Statewide (primarily Willamette Valley & Coast)	All
Revise Ratios and Thresholds for Lower-Quality Wetlands	For lower-quality wetlands such as hydric soils and former farmland, revise mitigation thresholds to maintain no-net-loss while reducing total mitigation required.	DSL	Rulemaking; Administrative	Current mitigation ratios may be disproportionate for lower-functioning wetlands commonly found in urban areas, increasing housing costs unnecessarily.	Cost	Medium	Medium	Statewide (primarily Willamette Valley & Coast)	All

Recommendation	Description	Agency	Type of Recommendation	What Problem Does This Solve?	Relationship to Housing Production	Timeframe	Magnitude	Geography	Kind of Housing
Update the Statewide Wetlands Inventory	Use remote sensing to develop a higher-quality statewide wetlands inventory that provides earlier information about the potential presence of wetlands.	DLCD, DSL, Legislature	Technical Assistance	Without a current statewide inventory, developers frequently discover wetland constraints late in the development process after significant site investment.	Complexity, cost, time	Medium	High	Statewide (primarily Willamette Valley & Coast)	All
Utilize the SHPO Inventory to Identify and Communicate Areas of Potential Cultural Resource Sensitivity	Direct SHPO to encourage use of its inventory database as an early screening tool and produce updated GIS layers to make cultural resource information more accessible.	SHPO, DLCD	Technical Assistance	Cultural resource constraints are most costly when discovered after a project is already in design, financing, or permitting.	Complexity, cost	Short	Medium	Statewide	All
Fund UGB Expansion Area Planning Grants	UGB Expansion Area Planning Grants provide support for comprehensive planning of unannexed land within recently added UGB areas.	Legislature, DLCD	Legislative	Lack of post-expansion planning undermines the ability of newly added land to support needed housing types and densities.	Cost, time	Medium	Medium	Statewide	Greenfield

Recommendation	Description	Agency	Type of Recommendation	What Problem Does This Solve?	Relationship to Housing Production	Timeframe	Magnitude	Geography	Kind of Housing
Simplify Planning Requirements and Streamline Land Supply Processes for Cities Under 10K	Revise Division 38 rules, streamline HCA and BLI processes, and tailor development code update requirements to fit the capacity of cities under 10,000.	DLCD, Legislature	Statute; Rulemaking; Administrative	Cities under 10,000 face the same UGB expansion and code update requirements as larger cities but without equivalent staff capacity.	Complexity, time, cost	Medium	High	Cities <10K	All
Navigation Support for Small Cities	Establish a single communication point through HAPO and Regional Solutions for housing producers and local governments to interface with state agencies.	HAPO, Regional Solutions, Multiple state agencies	Administrative; Technical Assistance	The cost of navigating regulatory complexity falls disproportionately on smaller developers and jurisdictions that cannot afford experienced consultants.	Complexity, time	Medium	High	Statewide	All
Develop a Dashboard to Track Timelines for State Agency Review	Provide a public-facing and internal agency-facing dashboard that tracks target timelines, actual time elapsed, and responsible parties for state agency permit reviews.	HAPO, DSL, DEQ, ODOT, SHPO, OHCS	Administrative	Unpredictable state agency review timelines add cost and make it difficult to plan financing and sequence construction.	Time, complexity	Short	Medium	Statewide	All

Recommendation	Description	Agency	Type of Recommendation	What Problem Does This Solve?	Relationship to Housing Production	Timeframe	Magnitude	Geography	Kind of Housing
Track Progress on Recently Adopted Reforms	Invest resources in developing statewide analysis of building permits, state permitting timelines, and housing production by type with standardized data sharing.	Legislature; State Agencies	Statute; Intergovernmental Agreement	Without systematic data on how recent reforms are affecting housing production, the state cannot identify what is working or where additional investment is needed.	Complexity	Medium	Medium	Statewide	All
Provide Support for Streamlining Data Collection and Reporting	Adopt consistent data standards for county assessor and city permitting data, provide technical support to update local systems, and ensure consistent deployment of Accela.	Legislature, DCBS, DLCD, OHCS	Statute; Technical Assistance	Absence of standardized, machine-readable permit and production data makes it difficult to assess housing output or evaluate policy effects.	Complexity, time	Long	Low	Statewide	All

Recommendations Not Included in Report

The recommendations below were considered during the development of this report and suggested during engagement but are not included in the primary recommendations in Chapters 3, 4, and 5. They are presented here for transparency and to support future policy development. The final column (highlighted) explains why each recommendation was not prioritized—including cases where content was absorbed into an active recommendation, where agency comments identified feasibility concerns, or where the recommendation may be better suited to a future phase of work.

Chapter 3: Policy and Program Analysis – Regulations and Permitting

Land Use Planning Requirements and Land Availability and Readiness

Recommendation	Description	Agency	Type of Recommendation	Considerations for Future Action
Focus on outcomes over process in UGB expansions	Shift evaluation criteria toward housing production outcomes rather than procedural compliance.	DLCD, Legislature	Statute; Rulemaking	Recommendation is premature, as OHNA has not been fully implemented. Recommend reevaluating once implementation is complete.
Create a process for expedited UGB review	Allow expedited UGB expansions where a city demonstrates need, state data identifies low-impact areas, and the city adopts policies to minimize resource impacts.	DLCD, Legislature	Statute; Rulemaking	The concept has been incorporated into another recommendation (Revise UGB Expansion Procedures).
Allow up to 20% more acreage than OHNA projections require	Authorize communities to designate up to 20% additional buildable acreage as a buffer against appeals and underestimation.	Legislature, DLCD	Statute; Rulemaking	Recommendation is premature, as OHNA has not been fully implemented. Recommend reevaluating once implementation is complete.
Revise the standards for LUBA to provide more authority to decisions	Limit appeals of LUBA decisions and make LUBA decisions final.	DLCD, Legislature, LUBA	Statute; Rulemaking	Recommendation contradicts Goal 1 (citizen involvement) of the land use system.

Recommendation	Description	Agency	Type of Recommendation	Considerations for Future Action
Allow UGB swaps when Development Ready Land Inventory exists (cities under 10K)	Allow simplified UGB swaps via expedited process for jurisdictions that have completed a Development Ready Land Inventory.	DLCD, Legislature	Statute; Rulemaking	Recommendation removed due to recent legislation that does not require cities under 10K to have Development Ready Land Inventory. Recommendation would create additional burden to small cities.
Revisit statewide planning goals	Reassess whether all 19 statewide planning goals remain relevant; consider combining, deprioritizing, or sunsetting some; determine how to resolve goal conflicts.	DLCD, Legislature	Statute; Rulemaking	Better addressed in a longer-term statutory reform process if specific goals are identified as creating disproportionate barriers to housing.
Simplify Transportation Planning Rule and CFEC	Reduce complexity of the Transportation Planning Rule and Climate-Friendly and Equitable Communities rules, particularly for smaller jurisdictions.	DLCD, ODOT	Rulemaking	Limited impact. Metro areas only. Additional research needed to understand which planning provisions create the most burden.
If mandated local code updates are required, provide minimum standards in addition to aspirational standards	Supplement aspirational model codes with minimum standards to reduce compliance burden and provide clearer targets.	DLCD	Rulemaking	Minimum standards are embedded in OHNA and the Housing Acceleration Program. Contradictory to recommendation to pause rulemaking.
Slow down on new legislation; give cities time to catch up	Temporary moratorium or significant reduction in new land use mandates to allow local implementation to catch up.	Legislature	Statute	Not an actionable, discrete recommendation but rather a larger theme. Somewhat out of scope.

Recommendation	Description	Agency	Type of Recommendation	Considerations for Future Action
Allow state mandates to apply automatically without requiring local code adoption	Make state housing mandates self-executing by removing the enforcement order requirement.	DLCD, Legislature	Statute	Recommended mechanism already exists. Enforcement order is not consistently enforced.
Provide clarity from HAPO and DLCD	Expand legal guidance available to cities on land use interpretation, especially new legislation.	DLCD, HAPO	Technical Assistance	Not feasible for DOJ to provide guidance to local government.
Treat cities as collaborators, not antagonists	Shift legislative agenda and agency culture toward collaboration and flexibility in compliance assistance.	DLCD, HAPO, Legislature	Cultural	Not an actionable, discrete recommendation but rather a larger theme. Somewhat out of scope.
DLCD regional meetings for small cities	Revive regular regional convenings to brief small city planners on new requirements and share implementation strategies.	DLCD	Technical Assistance	Recommendation removed as there are already small city planner meetings and webinars occurring through LOC and OAPA.

Design and Construction Review and Approval

Recommendation	Description	Agency	Type of Recommendation	Considerations for Future Action
60-day shot clock on new residential building permits	Set a statutory 60-day deadline for local jurisdictions to issue permits or refund 50% of fees.	Legislature, Local	Statute	A shot clock for residential permitting is in place under state law. Refunding permitting fees is counter to legislation on fee-based permitting and would further impact capacity issues.

Recommendation	Description	Agency	Type of Recommendation	Considerations for Future Action
Expand licensing pathways for trades	Create additional or streamlined licensing pathways for construction trades to address workforce shortages that limit housing construction capacity.	DCBS, CCB	Statute; Administrative	The topic of workforce/labor issues is out of scope.
Provide funding preferences for communities using BCD master plans program	Encourage use of the BCD master plans program by creating funding preferences in state housing and infrastructure grant programs for participating jurisdictions.	DCBS, OHCS, Business Oregon	Administrative	Recommendation removed because the master plan creates incentive through lower cost and faster process.

Wetlands Regulations and Incentives

Recommendation	Description	Agency	Type of Recommendation	Considerations for Future Action
Update criteria for defining wetlands inside UGBs	Change definitional criteria for wetlands inside UGBs to exclude hydric soils and former farmland; adopt the federal wetland definition.	DSL, DLCD	Statute; Rulemaking	Recommendation conflicts with statewide policy goals around wetland preservation. As the recommendation stands, it would remove local choice.
Establish more authority via Local Wetlands Inventory	Use a completed LWI to identify state-jurisdictional wetlands and reduce the need for case-by-case delineation by DSL.	DSL, DLCD	Statute; Rulemaking	Given the need for delineation and further technical analysis, this does not seem as feasible and conflicts with statewide policy goals.
Authorize funding for Local Wetlands Inventories	Provide dedicated funding so that more cities are incentivized to map wetlands and complete Local Wetlands Inventories.	Legislature	Allocation	Recommendation has been partially consolidated with the recommendation to encourage cities to adopt and update LWIs in Chapter 3. With current resource constraints, outstanding question regarding the impact of this investment.

Recommendation	Description	Agency	Type of Recommendation	Considerations for Future Action
Clarify DSL policies related to mitigation including threshold for payment in lieu	Better publicize the guideline that payment in lieu cannot be used above a certain acreage threshold. Make mitigation procedures transparent and clearly accessible.	DSL	Administrative	Recommendation removed due to low impact. Proposed advancing as implementation action through education, website updates and outreach rather than standalone recommendation.
Time limits for contested case decisions	Set a statutory time limit on contested case hearings for wetland permit decisions.	DSL, Legislature	Statute	Recommendation removed due to insufficient information around the frequency of contested case delays affecting housing projects.
Revise standards for wetland mitigation to improve redevelopment applications	Establish clear definitions of project size eligible for payment in lieu and provide design standards for mitigation in redevelopment contexts.	DSL	Rulemaking; Administrative	Recommendation was consolidated with wetlands recommendations in Chapter 3.

Historic Preservation and Cultural Resources Review

Recommendation	Description	Agency	Type of Recommendation	Considerations for Future Action
Model codes for historic resources	Develop model design standards for historic periods of significance that allow housing projects to bypass discretionary historic review.	SHPO, DLCD	Administrative	Some guidance in progress. Recommendation removed due historic review being incredibly context-specific, as well as predicted impact on housing production.

Infrastructure Capacity (Transportation, Stormwater, Drinking Water, Wastewater)

Recommendation	Description	Agency	Type of Recommendation	Considerations for Future Action
Encourage cluster systems for septic	Encourage local adoption of maintenance districts for cluster septic systems to streamline state permits and enable more housing in areas without centralized sewer.	DEQ, Local	Administrative; Technical Assistance	The recommendation is narrow and does not widely impact housing supply.
Leverage HAPO and Regional Solutions to support infrastructure planning	Use HAPO and Regional Solutions to facilitate interagency collaboration on infrastructure at regional scale for infill development and UGB expansion areas.	DLCD, Regional Solutions	Administrative	Recommendation has been consolidated into the structured communication and centralized permitting recommendations in Chapter 5.
Communicate about HAPO's one-stop infrastructure funding resource	Communicate information on all available state and federal infrastructure funding that HAPO has compiled.	HAPO	Technical Assistance	Recommendation has been consolidated into the structured communication and navigation support recommendation in Chapter 5.
Regional coordination of utility providers	Support local governments in coordinating utility providers that affect capacity for systems.	DLCD	Technical Assistance	Likely related to the centralized permitting and structured communication recommendations.

Redevelopment and Infill

Recommendation	Description	Agency	Type of Recommendation	Considerations for Future Action
Push SDC charges to end of development cycle (certificate of occupancy)	Change SDC payment timing to reduce upfront risk for developers and limit deferral fees.	Legislature, Local	Statute; Administrative	Recommendation was consolidated with pre-application coordination concept.

Recommendation	Description	Agency	Type of Recommendation	Considerations for Future Action
Quick access to state funding for unexpected site needs during redevelopment	Create a rapid-response funding mechanism for cost overruns due to unanticipated site conditions such as contamination or buried infrastructure.	OHCS, Business Oregon, DEQ, Legislature	Administrative; Statute	Recommendation removed due cost-recovery constraints. More information is needed to look at feasibility in future iterations.
Offer state agency pre-application meetings related to brownfields	Establish structured plan review meetings to resolve revision cycles more efficiently for brownfield projects.	DEQ	Administrative	Recommendation was consolidated with pre-application coordination concept.
Publish guidance on timeline for steps in brownfield remediation	Publish clear step-by-step timelines for brownfield remediation review so developers can plan accordingly.	DEQ	Administrative	Recommendation requires further engagement with DEQ due to timeline variation by project.
Align brownfield funding process with funder timelines	Streamline the application and approval process and better synchronize with development financing timelines.	Business Oregon	Administrative	Insufficient information provided about where bottlenecks occur in the Brownfields program. May be worth further investigation in future.
Develop guidance for redevelopment and infill funding	Audit and align funding programs to provide clarity about what funding is available for redevelopment and infill.	OHCS, DEQ, Business Oregon, Legislature	Administrative	Relates to ch 5 recommendations about underutilized funding.

Regulatory: General

Recommendation	Description	Agency	Type of Recommendation	Considerations for Future Action
Certify local government staff to approve state permits	Provide certification for local staff to process certain state permits or applications, reducing duplicative state review for straightforward projects.	Multiple	Administrative; Rulemaking	Better education for local staff and developers may be more effective.
Standardize and enforce state agency permit review timelines	Require clear timelines for permit review across jurisdictions.	Local, Legislature	Statute	Need to understand timelines before establishing thresholds. A broader statutory timeline requirement could be explored if monitoring confirms permit delays as a significant barrier.
Replicate certified consultant practices across other agencies	Provide lists of certified consultants who can work on behalf of local governments on complex state permitting processes.	DSL, DLCD, DEQ, SHPO	Technical Assistance; Administrative	Recommendation removed due to agency concern about effectiveness. Certification does not necessarily reduce cost or complexity.

Chapter 4: Policy and Program Analysis: Funding

Infrastructure Funding Programs

Recommendation	Description	Agency	Type of Recommendation	Considerations for Future Action
Increase and prioritize infrastructure funding within UGBs	Prioritize funding for infrastructure in existing UGBs to unlock infill development.	Business Oregon, DLCD	Administrative; Statute	Recommendation consolidated with Chapter 4 recommendation to expand HIFP and planning for UGB expansion areas rather than creating new models.

Recommendation	Description	Agency	Type of Recommendation	Considerations for Future Action
Expand state-sponsored infrastructure financing or consider new models	Expand the Housing Infrastructure Financing Program or establish a revolving low-interest loan fund for infrastructure to reduce upfront development costs.	Business Oregon, Legislature	Statute; Administrative	The new revolving fund concept is set aside in favor of expanding the existing HIFP program, which is addressed in the active Chapter 4 recommendations.
Encourage SDC reimbursement districts	Allow developers to recover oversized infrastructure costs through SDC reimbursement districts over time.	Local, Legislature	Statute	May be worth revisiting in a future phase focused specifically on development finance tools for large-scale greenfield projects. Deemed more appropriate for the LRDPIS.

Affordable Housing Funding and Support

Recommendation	Description	Agency	Type of Recommendation	Considerations for Future Action
Clarify prevailing wage applicability for affordable housing and infrastructure	Provide definitive guidance on prevailing wage applicability for affordable housing projects.	BOLI, OHCS, Business Oregon	Administrative; Rulemaking	The topic of prevailing wage is out of scope.
Prioritize OHCS funding for projects serving lowest-income households	Create or strengthen funding preferences within OHCS programs for projects serving households at the lowest income levels.	OHCS	Administrative	Consolidated with other affordable housing recommendations.

Recommendation	Description	Agency	Type of Recommendation	Considerations for Future Action
Provide incentives for property tax exemptions for affordable housing	Encourage local property tax exemptions for affordable housing by giving funding preferences to communities with adopted exemption programs; consider a statewide exemption.	DOR, Legislature	Statute	Recommendation removed due to potential local government resistance due to revenue implications.