



Oregon

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January 9, 2025

Ariel Kane, Economic City Planner II
City of Portland, Bureau of Planning and Sustainability
1810 SW 5th Ave, Suite 710
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Sent via e-mail



RE: Review of City of Portland's Housing Production Strategy

Dear Economic City Planner Kane,

On September 9, 2024, the Department of Land Conservation and Development (DLCD or Department) received a submittal from the City of Portland notifying the Department of the adoption of the city's Housing Production Strategy (HPS). Per Oregon Administrative Rules ORS 197A.103(4), the Department posted the city's HPS for a 45-day public comment period on September 12, 2024. Upon the close of the public comment period on October 27, 2024, the department received a total of two comments on the city's HPS. The public comments received by the department are attached to this letter as Attachment A.

Per ORS 197A.103(6) (formerly ORS 197.291(6)), the Department must review the city's submittal to determine whether to:

1. Approve the Housing Production Strategy Report;
2. Approve the Housing Production Strategy, subject to further city review and actions as recommended by the Department; or
3. Remand the Housing Production Strategy for further modification as identified by the Department.

The Department is required to complete this review and issue a decision within 120 days of the city submittal. In the case of the City of Portland's Housing Production Strategy, the department must make a final decision by January 9, 2025. Per ORS 197A.103(7) (formerly ORS 197.291 (7)), the Department's decision is final and may not be appealed.

*Based on the department's review of the City of Portland's Housing Production Strategy against the review criteria established in OAR 660-008 as it was in effect prior to amendments adopted by the Land Conservation and Development Commission in December 2024, which remains applicable to this review pursuant to ORS 197A.025 (Section 9), the department **approves the City's Housing Production Strategy Report with two (2) conditions described below.***

(The review criteria applicable to this Housing Production Strategy are available for reference through the Oregon Secretary of State's Archives Division here:

<https://secure.sos.state.or.us/oard/displayCompilation.action?compRsn=122>, Chapter 660, Division 8).

Department Findings based on OAR 660-008-0050

(1) Contextualized Housing Need – A contextualization and incorporation of information from the most recent Housing Capacity Analysis that describes current and future housing needs in the context of population and market trends.

The City of Portland adopted its Housing Capacity Analysis (HCA) in December 2023 and its Housing Production Strategy (HPS) eight months later, in August 2024, meeting its statutory obligation to adopt these housing planning documents as prescribed by ORS 197A.103 (formerly ORS 197.291). Between both documents, they include all elements necessary to be in compliance with OAR 660-008-0050 (1) (A-H).

The city's HPS includes the chapter titled "*Portland's Housing Need*" and Appendix A "*Additional Housing Need Context*". The city's HCA includes chapters titled "*City of Portland Context*", "*Housing Inventory and Supply*", "*Residential Market Conditions*" and "*Existing Housing Need*". Together, these sections provide an overview of the city's demographic and socio-economic characteristics and affordability metrics, disaggregated by race and ethnicity.

In particular, as of 2021, the city had 647,176 residents, with an average household size of 2.19 persons across 279,797 households. Portland has seen steady population growth concentrated in neighborhoods like Central City, Interstate Corridor, MLK-Alberta, and Lents-Foster. However, growth has slowed since 2020, with a slight decline observed during the COVID-19 pandemic. The city's racial and ethnic diversity continues to increase, with white, non-Latine individuals comprising 69% of the population, followed by Latine or Hispanic residents (11%), Asian residents (8%), and Black or African American residents (6%). Neighborhoods citywide now have Black, Indigenous, and People of Color (BIPOC) populations exceeding 15%. Linguistic diversity is notable, with 19% of households speaking a language other than English at home, though only 2.7% are classified as limited English-speaking households. Portland's median age is 37.9 years, with an increasing share of older adults (13% of the population in 2021). Households are predominantly one- and two-person, representing 70% of all households, while families and households with children have seen a slight decline.

Housing affordability remains a critical challenge, particularly for historically underserved communities. BIPOC residents, as well as those with disabilities, disproportionately experience housing insecurity and homelessness. In 2022, Black residents accounted for 15% of the homeless population, despite making up only 6.5% of the city's population. Additionally, 65% of unhoused individuals reported having at least one disability, highlighting the intersection of housing need and health disparities.

Portland also faces significant cost-burden challenges, with more than one-third of households spending over 30% of their income on housing costs. Approximately 50% of renters are cost-burdened, compared to 26% of homeowners. Cost burden is particularly severe among renters with incomes below \$35,000, especially for those earning less than

\$20,000, where 66% are classified as severely cost-burdened. Racial disparities exacerbate these challenges, as Black residents experience the highest rates of cost burden, with 22% of Black homeowners and 38% of Black renters severely cost-burdened. Additionally, 42% of Portland households struggle with residual income cost burdens, meaning they don't have enough money left after housing expenses to cover basics like food, healthcare, and transportation. Renters are disproportionately affected, with 55% experiencing residual cost burden.

Over the past nine years, the city has actively implemented measures to promote the development of needed housing, with a focused effort since the passage of its 2015 Emergency Ordinance Declaring a State of Emergency for Housing and Houselessness. The HPS highlights these efforts in the introductions to each category of actions and provides a summary under Appendix B: "*Housing Policy in Portland*". The Department commends the city's work and ongoing commitment to addressing Portland's housing needs.

The city's HPS includes Appendix A "*Additional Housing Need Context*" outlining key market conditions in Portland affecting the provision of needed housing. Those include existing stock dominated by single-detached homes (54% of units), though the largest growth has been in studio apartments (86% increase since 2010), with limited additions to two-bedroom units. Family-sized units account for 45% of the housing stock, but racial disparities exist, with Black households more likely to reside in large apartment buildings, plexes, or smaller apartments. Vacancy rates have declined to 5.6%, lower than the state average, reflecting high demand, particularly for lower-cost units, while more expensive, higher-quality buildings have the highest vacancy rates.

In the rental market, prolonged demand and limited supply have driven up rents, with new units largely unaffordable to lower-income households. Despite increased construction of larger apartment complexes, the average rent for newly constructed units (\$1,700) is notably higher than the citywide average (\$1,465). Affordability challenges disproportionately affect Black, Latine, and Native American households. The ownership market also faces affordability constraints, with a sales vacancy rate of just 0.8% signaling strong demand. Home prices have risen substantially, averaging \$606,000 in 2023, with detached homes reaching even higher prices. However, middle and attached housing units, supported by city's policies like the Residential Infill Project and Homebuyer Opportunity Limited Tax Exemption (HOLTE), show promise for affordability, with newly constructed attached units decreasing in price.

The city's HPS includes chapter "*What are the Barriers to Producing Needed Housing*" and Appendix A "*Additional Housing Need Context*" outlining challenges to the development of needed housing. Including escalating costs, limited funding availability, regulatory burdens, and market constraints. Rising construction costs, driven by inflation in key materials such as concrete, lumber, and steel, have widened feasibility gaps for residential projects. Coupled with higher interest rates since 2022, borrowing has become more expensive, further undermining development feasibility. Locally, System Development Charges (SDCs) disproportionately impact smaller and affordable housing projects, adding financial strain.

Workforce shortages, particularly in skilled construction trades, exacerbate delays and increase costs. Developers also face tighter lending conditions, with banks reducing loan-to-cost ratios, compelling them to seek alternative funding sources or reduce project scope. Regulatory hurdles, including zoning requirements and impact fees, create additional barriers to timely housing production.

Market dynamics compound these issues. Rising mortgage rates have significantly increased monthly payments, deterring both buyers and sellers, while low wages and high housing costs leave many households unable to compete. In Portland, nearly half of renters are cost-burdened, and incomes lag behind housing prices. Developers face a misalignment between achievable rental rates and the cost of construction, particularly for low- and moderate-income households. As a result, new housing often fails to meet affordability needs, leaving a critical gap in accessible housing options.

Additionally, in this same chapter, the city notes that in 2023, Multnomah County experienced a significant increase in houselessness, with 6,297 individuals counted as unhoused—a 27% rise from 2022, driven largely by unsheltered houselessness. Certain racial groups were disproportionately affected, including Black or African American residents (18% of the houseless population compared to 7% of the overall population), American Indian or Alaska Native individuals (5% compared to 3%), Native Hawaiian or Other Pacific Islanders (3% compared to 1%), and those of Multiple Races (11% compared to less than 3%). The county's facilities for houseless persons expanded, offering a total of 11,863 year-round beds, an increase of 1,732 permanent and 544 emergency beds from the previous year. Despite these efforts, the city notes the need for transitional housing, supportive services, and deeply affordable housing remains critical. Additionally, the number of students experiencing houselessness across local school districts rose by 43% from the 2021–2022 to the 2022–2023 school year, reaching 1,819 students, including 286 unaccompanied minors. The city notes that these findings underscore the urgent need for both immediate and long-term solutions to address the growing houselessness crisis.

(2) Engagement – A Housing Production Strategy Report must include a narrative summary of the process by which the city engaged Consumers of Needed Housing and Producers of Needed Housing, especially with regard to state and federal protected classes. A city may conduct engagement for a Housing Production Strategy concurrent with other housing planning efforts within the city including, but not limited to, a Housing Capacity Analysis, Consolidated Plans for Community Development Block Grant Entitlement Communities, and public engagement for Severely Rent Burdened Households as described in OAR 813-112-0010.

The city undertook engagement activities as part of the development of both the HCA and HPS, ultimately informing the needs identification and actions selection elements of the city's final HPS.

The city's HCA includes a chapter titled "*Engagement*" noting the engagement tactics completed. These efforts include: a series of three meetings with the Technical Advisory Committee established for the HCA process, and regular briefings with the Planning Commission and City Council throughout the development of the HCA. Additionally, the

City's HPS includes the chapter titled "*Strategic Stakeholder Outreach*" within Appendix C which summarizes city staff engagement with various community groups for the development of the HCA from July through October 2023. Staff attended group meetings, held via Zoom video conference, to introduce the project and collect feedback on the project engagement strategy, equity considerations, and housing needs. The following interested party groups were engaged: Portland State University Homelessness Research Center, Anti Displacement PDX, Sightline, Cully Neighborhood Association, Portland Neighbors Welcome, Development Review Advisory Committee, Community Involvement Committee, Portland Homebuilders' Association, Portland Building And Development Council, East Portland Action Plan Housing Committee, Central Eastside Industrial Council, Oregon Smart Growth, North Portland Land Use Group, SE Uplift, and the Southwest Land Use & Transportation Forum.

In Appendix C "*Engagement Plan and Activities*" of the city's HPS Report, new engagement activities are detailed. They focused on broad citywide participation and feedback derived from previous housing-related planning projects. Key engagement activities included:

- An online open house held in April 2024 to present the HCA findings and draft HPS actions, aimed at gathering input on policy options and community priorities.
- An online survey conducted between March 8, 2024, and April 14, 2024, which garnered 350 responses and provided insights into current housing challenges, needs, and long-term preferences.
- Public comment opportunities via the Bureau of Planning and Sustainability's Map App. The Proposed Strategies Discussion Draft of the HPS was available for comment from February 21, 2024, to April 7, 2024, receiving 50 public comments. The Map App comment period reopened from May 14 to June 11 during Planning Commission discussions, generating an additional 57 comments.

The city's HPS includes a chapter titled "*Engagement Summary*" noting broad and targeted engagement included outreach with both residents and developers of housing through discussions with individuals, coalitions, community groups and developers as well opportunities for general public comments through online platforms.

- 256 individuals while at 25 organization/coalition meetings and open houses
- 66 individuals at six Black, Indigenous and People of Color (BIPOC) specific focus groups
- 42 individuals at in-person East Portland BIPOC community meeting
- 350 individuals via Citywide Housing Needs Survey
- 107 comments on the Discussion Draft of the HPS Action Plan
- 16 developers/producers of housing interviewed
- 4 Cross-Jurisdictional Technical Advisory Committee Meetings
- 28 Multi-Bureau Internal Working Group Meetings

Based on this, the city has satisfied the requirements of OAR 660-008-0050(2)(a). Of note for future HPS reports, the Department recommends the city provide a clearer line as to why

these interested parties were engaged (explaining their relevance to the activity). This additional clarity will enhance transparency and demonstrate how engagement activities effectively informed the development of the HPS. Though it's important to note the Department commends the city's engagement efforts and commitment to ongoing engagement that is culturally responsive, trust building, and nurturing.

The city's HPS' chapter "Engagement Summary" includes a summary of the themes received from both residents and developers. Additionally, the city's Appendix C "Engagement Plan and Activities" includes a clear summary that overviews the themes received from the various engagement activities conducted. The city has satisfied the requirements of OAR 660-008-0050(2)(b).

OAR 660-008-0050 (2)(c) requires "A description of how the information from stakeholders influenced implementation of Housing Production Strategies adopted by the city...". The "*Engagement Summary*" chapter in the HPS and the "*Strategic Stakeholder Outreach*" chapter within Appendix C identified themes and tangible barriers, and the summary included a broad description of relevant engagement influencing strategy selection. The Department finds the themes from engagement activities are reflected in the selected strategies, but this required inference by DLCD staff to connect themes identified in engagement to the individual strategies, themselves. While the HPS "*Engagement Summary*" chapter and the "*Strategic Stakeholder Outreach*" chapter within Appendix C articulates the feedback themes from engagement, there is no clear nexus between the feedback received and how it informed the city's final strategies. DLCD staff did find that most strategy category introductions made some notes about feedback received and how it influenced the selected actions within each category. It is apparent that many of the selected strategies are responsive to broad themes of increasing affordability, leveraging financial incentives to support production, reducing development barriers, providing supportive and housing stabilization programs, and increasing homeownership, all of which address the issues identified via engagement. In the context of this evaluation, DLCD concludes that OAR 660-008-0050 (2)(c) is satisfied. However, for future HPSs the Department recommends the City establish a clear, thorough, and specific connection between community engagement feedback, both past and present, and the strategies chosen. This should be done in a way that does not necessitate DLCD staff interpretation or additional research, ensuring a more transparent and direct correlation between stakeholder input and the selected strategies in future reports.

OAR 660-008-00050 (2)(d) requires "An evaluation of how to improve engagement practices for future housing engagement efforts conducted by the city." This requirement provides a critical opportunity for cities to assess and enhance their engagement programs, ensuring that future housing planning efforts are inclusive, effective, and responsive to the diverse needs of the community. The city identified several areas for improvement, even though robust engagement efforts were part of the development of the HPS Report. Those areas include: a) timing engagement activities to align with advocates' availability given the city's engagement activities overlapped with the State Legislative session which is a period when many organizations and community groups focus on advocacy efforts; b) strengthening

culturally responsive and trauma-informed practices to further prioritize approaches that respect the time, resources, and capacity of community members-particularly those from underrepresented groups- while avoiding tokenization, avoiding major religious holidays, enhancing language accessibility; and c) improving support for immediate household needs to not only address real and urgent housing needs but to also build trust with communities. DLCD commends the city's commitment to culturally responsive engagement practices and nurturing relationships, especially with underserved communities. The Department finds that OAR 660-008-00050 (2)(d) is met.

Based on the Department's review of Portland's qualitative and quantitative analysis as outlined in OAR 660-008-0050 (1) and (2), Department staff synthesized the city's identified housing needs, including fair housing issues, into the following table. This table serves as an example template the city might consider using in future HPS Reports. Incorporating such a tool could help organize and clearly present the findings from the city's analyses (both qualitative and quantitative), particularly by highlighting key conclusions. Doing so would not only enhance the report's narrative but also reduce the Department's need to extract and interpret conclusions from the analysis.

Identified Fair Housing Issues	Identified Housing Needs
Affordability Disparities • BIPOC residents and individuals with disabilities disproportionately face housing insecurity and homelessness. • Racial disparities in cost burden are significant: Black renters experience the highest rates of severe cost burden (38%). Exclusionary Neighborhoods • Racially concentrated areas of affluence (RCAAs) in high-opportunity neighborhoods exclude low-income households, perpetuating segregation. • RCAAs contain less than 1% of the city's regulated affordable housing units. Accessibility and Disability Barriers • 22-27% of Portland households include a member with a disability. • Adults with disabilities often rely on insufficient supplemental security income (SSI).	Affordable Housing Expansion • Deeply affordable housing is critical, especially for households earning less than 50% AMI and those requiring permanent supportive housing. • Targeted assistance is needed for cost-burdened renters earning less than \$20,000, as 66% are severely cost-burdened. • Despite expanded facilities for homeless persons (11,863 year-round beds, including 1,732 permanent and 544 emergency beds), transitional housing remains a critical need. • The number of students experiencing homelessness rose by 43% between 2021–2022 and 2022–2023, reaching 1,819 students, including 286 unaccompanied minors. Family and Larger Housing Unit Needs

- Seniors (33% of residents over 65) report at least one disability, increasing demand for accessible and visitable housing. Displacement Risks - Economic pressures in low-income neighborhoods increase the risk of displacement for vulnerable households Racial Disparities in Homeownership - White and Asian households have the highest rate of homeownership (56 and 61 percent, respectively). - Native Hawaiian and Other Pacific Islander (32 percent) and Black or African American (34 percent) households, and households identifying as another race (24 percent), have the lowest ownership rates. Climate Vulnerabilities and Resilience - Vulnerable populations are disproportionately exposed to risks in urban heat islands and high-liquefaction zones.	- At least 30% of new housing units should accommodate families with three or more persons to reduce overcrowding and support intergenerational housing. - Expanding the supply of two-bedroom and middle-income housing is critical to meet demand. Accessible Housing - An expanded inventory of accessible units is required to meet the needs of individuals with disabilities and seniors. - Design features must incorporate accessibility, visitability, and compliance with fair housing standards. Equitable Housing and Opportunity Access - Increase affordable housing in high-opportunity neighborhoods while reducing segregation. - Implement policies to mitigate displacement in economically vulnerable areas. - Households seek housing with access to green spaces, transit, grocery stores, and other community assets. Inclusive Homeownership Opportunities - Increase access to affordable homeownership opportunities for underrepresented groups to address racial disparities in ownership rates. Climate Resilient Housing - Prioritize housing development outside of urban heat islands and high-risk liquefaction zones. - Promote sustainability and climate adaptation measures in new housing developments.
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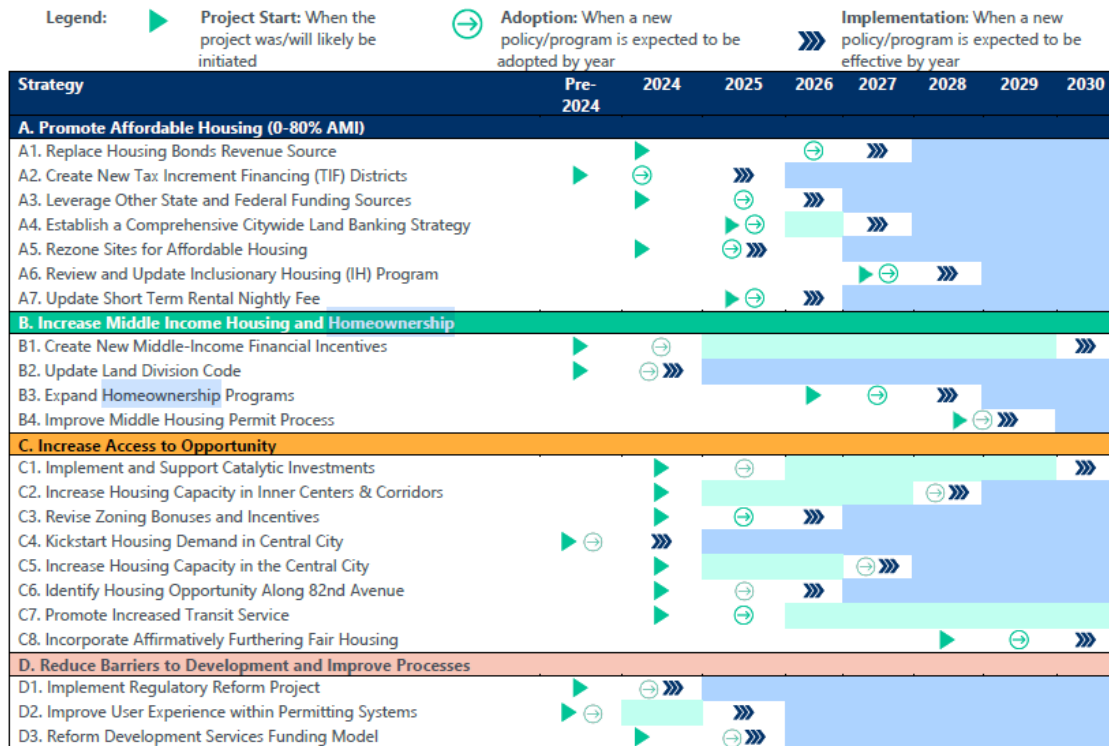
(3) Strategies to Meet Future Housing Need – A Housing Production Strategy Report must identify a list of specific actions, measures, and policies needed to address housing needs identified in the most recent Housing Capacity Analysis. The strategies proposed by a city must collectively address the next 20-year housing need identified within the most recent Housing Capacity Analysis and contextualized within the Report as provided in section (1). A Housing Production Strategy Report may identify strategies including, but not limited to, those listed in the Housing Production Strategy Guidance for Cities published by the Commission under Exhibit B.

The city's HPS Report outlines 35 primary strategies, along with multiple sub-strategies (or actions) under each, designed for implementation within its six-year HPS cycle to address identified housing needs. These actions are detailed in the chapter titled "*New Strategies to Meet Future Housing Need.*" To provide clarity and structure, the city has organized these actions into eight categories, as follows (further details on each category and its associated action can be found in the excerpt below):

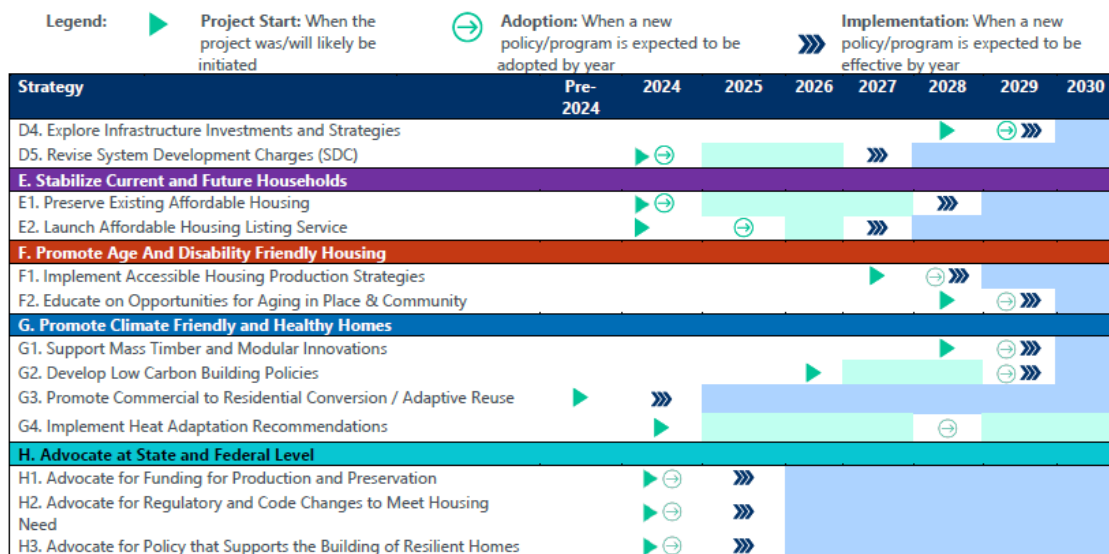
- A. Promote Affordable Housing (0-80% AMI)
- B. Increase Middle Income Housing and Homeownership
- C. Increase Access to Opportunity
- D. Reduce Barriers to Development and Improve Processes
- E. Stabilize Current and Future Households
- F. Promote Age and Disability Friendly Housing
- G. Promote Climate Friendly and Healthy Homes
- H. Advocate at the State and Federal Level

Each action in the HPS report includes a description, a timeline for adoption and implementation, and an estimated magnitude of impact within the six-year HPS cycle, meeting the requirements of OAR 660-008-0050(3)(a-d). Additionally, OAR 660-008-0050(3)(d)(C) requires an analysis of the income and demographic populations anticipated to benefit from or be burdened by each action. This analysis' intent is to support the refinement process for selecting actions that ultimately get included in a city's final HPS Report. The city has provided this analysis in the "*Achieving Fair and Equitable Housing Outcomes*" chapter, within a table labeled "Figure 12: Assessment of Benefits and Burdens by Strategy". However, it is unclear whether the analysis was conducted during the action selection process or afterward. Figure 12 does identify several benefits and potential burdens to federal and state protected classes and historically marginalized communities. Where potential burdens are identified, the report flags mitigation measures that the city *could* employ to reduce their likelihood and severity. Committing to mitigating factors is the intent. Collectively, this information minimally satisfies the requirements of OAR 660-008-0050(3)(d)(C).

New Strategies by Adoption And Implementation Timeline



City of Portland Bureau of Planning and Sustainability 2024 Housing Production Strategy 18



Based on the Department's review of the city's 35 actions and associated sub-actions included in the city's HPS report compared to the city's identified housing needs, Department staff find that the city's selected actions are intended to correspond to addressing housing needs, aligning with this rule's intent. However, several challenges were identified during the review process.

Many of the proposed actions in the HPS lack sufficient clarity, specificity, and commitment, which undermines their potential to establish a clear path toward implementation. Misalignments or inconsistencies between overarching actions and their associated sub-actions further complicate the strategy. Additionally, the inclusion of multiple exploratory efforts (e.g., studies or analyses) as part of the HPS, while acceptable as supporting measures, does not directly fulfill housing needs on its own. These gaps made it difficult for Department staff to fully understand the intended outcomes or draw a confident connection between the city's proposed actions and its identified housing needs.

The purpose of the HPS is to provide actionable, measurable strategies that directly address housing needs. Without sufficient clarity of intended actions and alignment with identified need, the Department cannot effectively track progress or provide the necessary support to the city as part of the HPS cycle. This work is a key component of the Housing Acceleration Program, established under the Oregon Housing Needs Analysis policy (HB 2001, 2023) and outlined in ORS 197A.130.

To address these concerns and ensure the HPS is actionable, the Department is applying the following condition of approval.

Condition of approval #1: The city shall clarify the actions and sub-actions currently included in its HPS report to address identified gaps in specificity, implementation timelines, and alignment with identified housing needs. Re-adoption of the HPS document or amendment of existing proposed actions is not required. Rather, the department seeks additional information related to the city's existing proposed actions and sub-actions in order to 1) support implementation of city actions and 2) facilitate the department's review under the Housing Acceleration Program at the applicable mid-point review under OAR 660-008-300. The department requests the city provide this additional information and clarity within 90 days (by April 9, 2025) from the issuance of this HPS decision letter.

During this process, the city must collaborate closely with Department staff to clearly define its commitments by:

- Distinguishing between exploratory efforts and actionable strategies;
- Ensuring that each actionable commitment includes a specific implementation timeline;
- Demonstrating how the refined actions and sub-actions directly respond to the city's identified housing needs, particularly addressing the needs of communities of color, low-income populations, and people with disabilities, and other historically marginalized communities; and

- Resolving inconsistencies or misalignments between overarching actions and their associated sub-actions, ensuring the strategy is cohesive, actionable, and measurable

This condition of approval is critical to ensuring the HPS fulfills its intended purpose of addressing housing needs through strategies that are both actionable and measurable.

(4) Achieving Fair and Equitable Housing Outcomes – A Housing Production Strategy Report must include a narrative summarizing how the selected Housing Production Strategies, in combination with other city actions, will achieve equitable outcomes with regard to the following factors:

(a) Location of Housing – How the city is striving to meet statewide greenhouse gas emission reduction goals, established under Executive Order No. 20-04, by creating compact, mixed-use neighborhoods available to people who are members of state and federal protected classes. Within Metro, cities subject to this rule shall describe actions taken by the city to promote the production of regulated affordable units, as defined in ORS 456.586(1)(b); to promote the production of accessible dwelling units; to mitigate or avoid the displacement of members of state and federal protected classes; and to remove barriers and increase housing choice for members of state and federal protected classes within Region 2040 centers.

(b) Fair Housing – How the city is affirmatively furthering fair housing for all state and federal protected classes. Affirmatively furthering fair housing means addressing disproportionate housing needs, patterns of integration and segregation, racially or ethnically concentrated areas of poverty, and disparities in access to housing opportunity;

The HPS report's "*Achieving Fair and Equitable Housing Outcomes*" chapter identifies numerous actions supporting the intent of OAR 660-008-0050(4)(a)-(c), including:

- Review and Update Inclusionary Housing (IH) Program
- Create New Tax Increment Financing Districts
- Rezone Sites For Affordable Housing
- Incorporate Affirmatively Furthering Fair Housing Into City Code
- Establish a Comprehensive Citywide Land Banking Strategy
- Update Land Division Code
- Improve Middle Housing Permit Process
- Increase Housing Capacity in Inner Centers & Corridors
- Kickstart Housing Demand in Central City
- Increase Housing Capacity in the Central City
- Identify Housing Opportunity Along 82nd Avenue
- Promote Increased Transit Service

- Preserve Existing Affordable Housing
- Launch Affordable Housing Listing Service
- Implement Accessible Housing Production Strategies
- Educate on Opportunities for Aging in Place & Community
- Develop Low Carbon Building Policies
- Promote Commercial to Residential Conversion / Adaptive Reuse
- Advocate for Funding for Production and Preservation
- Advocate for Regulatory and Code Changes to Meet Housing Need
- Advocate for Policy that Supports the Building of Resilient Homes

Additionally, the city conducted a locational analysis titled, “*Housing Location Analysis*,” included in Appendix A of the HPS report. The Department commends the city for this additional analysis, which offers critical insights into housing location, fair housing, and housing choice across the city. The locational analysis identified several key challenges relevant to housing location and fair housing outcomes on page 91 as follows:

- **Exclusionary Patterns of High-Opportunity Areas:** “The RECAP/RCAA analysis reveals that many of Portland’s racially concentrated areas of affluence are located in complete neighborhoods and high-opportunity zones but have effectively excluded low-income households, many of which are members from the protected classes, from accessing these areas, thereby perpetuating historical patterns of racial and income segregation. RCAAs account for eight percent of existing households, but only accounted for three percent of all permitted units between 2003 – 2022 and are expected to capture only three percent of the new housing demand in the next 20 years. Addressing the exclusionary zoning policies that uphold this fundamental barrier to fair housing is essential to increasing equitable access and opportunity for all residents.”
- **Distributing Growth to Mitigate Displacement:** “By enabling greater capacity and growth in exclusionary neighborhoods that are also high-opportunity, housing demand pressures can be more evenly distributed, easing mounting pressures in economically vulnerable neighborhoods that could be subject to rising housing costs. These efforts should be complemented by policies aimed at allowing residents to stay in place to effectively mitigate displacement impacts on the city’s most economically vulnerable residents.”
- **Climate Resilience and Hazard Mitigation:** “The Low residential VMT areas analysis shows that low VMT areas generally align with key growth areas, indicating that Portland's housing growth pattern is in line with the city’s goals to reduce VMT and associated carbon emissions. The hazard risk analysis reveals that urban heat islands and high probability liquefaction zones are hazard areas most significantly affecting future growth. More than a third of the new demand is concentrated in urban heat islands and close to 20

percent in high-risk liquefaction areas. This analysis underscores the urgency of identifying and implementing policies to mitigate climate risk impacts on Portland residents. These policies can also enhance the resilience of Portland's most vulnerable residents residing in existing regulated affordable housing units, given that 44 percent of regulated affordable units are situated within urban heat islands and 20 percent within liquefaction-prone areas."

These analytical conclusions are significant challenges the city is experiencing — exclusionary zoning, displacement risks, climate vulnerabilities, and inequitable access to opportunity.

Department staff acknowledge the city's efforts and affirm that the actions outlined in the "*Achieving Fair and Equitable Housing Outcomes*" chapter related to housing location and fair housing align with the intent of the rule from a compliance perspective. However, as noted in the previous section of this letter, the lack of specificity and actionable details limit full demonstration of how they will:

- Promote the production of regulated affordable units *in* high-opportunity areas *for* communities of color, people with disabilities, low-income populations, and other historically marginalized communities, as defined in ORS 456.586(1)(b);
- Increase the availability of accessible dwelling units *for* people with disabilities;
- Mitigate or avoid displacement of members *of* historically state and federal protected classes;
- Remove barriers and increase housing choice *for* communities of color, people with disabilities, low-income populations, particularly within Region 2040 centers; and
- Address patterns of integration and segregation and racially or ethnically concentrated areas of poverty *for* communities of color and low-income populations.

The refinement of the city's actions required by Condition of Approval #1 will help address this demonstration gap and meaningful alignment of this rule and the conclusions of the housing needs and locational analysis.

(c) Housing Choice – How the city is facilitating access to housing choice for communities of color, low- income communities, people with disabilities, and other state and federal protected classes. Housing choice includes access to existing or new housing that is located in neighborhoods with high-quality community amenities, schooling, employment and business opportunities, and a healthy and safe environment.

The city's housing analysis identified several challenges affecting housing choice—defined as the ability to select or access housing that meets individual needs—for communities of color, low-income populations, people with disabilities, and other state and federal protected classes. These challenges include affordability disparities,

barriers to accessibility, homeownership inequities, displacement risks, and experiences of housing discrimination. The city outlines several actions in the “*Achieving Fair and Equitable Housing Outcomes*” chapter that aim to foster access to affordable, safe, diverse, and suitable housing. However, the actions lack explicit emphasis on how they *directly center these historically marginalized communities*. While DLCD staff infer alignment with the intent of OAR 660-008-0050(c), this connection is not clearly articulated. The refinement required under Condition of Approval #1 is intended to strengthen and clarify how these actions explicitly address the needs of these historically marginalized communities, ensuring alignment with the rule’s directive.

(d) Housing Options for People Experience Homelessness – How the city is advocating for and enabling the provision of housing options for residents experiencing homelessness and how the city is partnering with other organizations to promote services that are needed to create permanent supportive housing and other housing options for residents experiencing homelessness;

The city’s overarching action category E “*Stabilize and Current and Future Households*” describes the city’s focus on continued investment in ongoing and existing policies and programs that provide funding or manage programs that aid households in maintaining their housing. New sub-actions included in this category focus on building out policy and programs that will preserve the supply of regulated and unregulated affordable housing units and help ensure equitable access to housing.

Department staff acknowledge and commends the city’s significant efforts to support the needs of people experiencing homelessness and finds the city satisfies compliance with OAR 660-008-0050(4)(d).

(e) Affordable Homeownership and Affordable Rental Housing – How the city is supporting and creating opportunities to encourage the production of affordable rental housing and the opportunity for wealth creation via homeownership, primarily for state and federal protected classes that have been disproportionately impacted by past housing policies; and

The Affordable Homeownership and Affordable Rental Housing subsection in the HPS report’s “*Achieving Fair and Equitable Housing Outcomes*” chapter include multiple actions. DLCD agrees that these actions provide meaningful incentives likely to support production aligned with these outcomes, thereby complying with OAR 660-008-0050(e). However, given the existing and persistent racial disparities identified in the housing analysis and the city’s acknowledgment of how land use and other policies have contributed to these inequities, it is critical that these actions be explicitly targeted toward historically marginalized communities. While DLCD staff infer this intent, strengthening this connection will be necessary as part of the refinements required under Condition of Approval #1.

(f) Gentrification, Displacement, and Housing Stability – How the city is increasing housing stability for residents and mitigating the impacts of gentrification, as well as the economic and physical displacement of existing residents resulting from investment or redevelopment.

The Gentrification, Displacement, and Housing Stability subsection in the HPS Report's *Achieving Fair and Equitable Housing Outcomes*" chapter include several existing and new actions aimed at increasing housing stability for community members and mitigating the impacts of gentrification and displacement. The Department commends the city's efforts on this work and will be particularly interested to understand how well these efforts are working at the Mid-Point Report, as required by OAR 660-008-0060.

Notably, in the city's Assessment of Benefits and Burdens subsection in the HPS Report's *Achieving Fair and Equitable Housing Outcomes*" chapter, the city identified the following burden tied to several actions:

If property values increase as a result of investment, there is a potential for displacing existing residents. The city *could* incorporate anti-displacement strategies into the investment framework or plan to mitigate this risk.

The Department emphasizes that the Benefits and Burdens Analysis requires not only the identification of burdens but also a committal response to address them. For actions where this burden is identified, the city must articulate specific mitigation strategies and commitments to reduce the risk of displacement. These measures are essential to ensure that the intended benefits of investment are equitably distributed and do not disproportionately harm vulnerable communities.

As part of the refinements required under Condition of Approval #1, the Department will look to the city to clarify its approach to mitigating displacement risks and ensure that actionable commitments are included in the implementation of these strategies. This refinement will provide a clearer understanding of how the city intends to balance the benefits of increased investment with the need to protect existing community members from displacement.

(5) A Housing Production Strategy Report must include the following additional elements:

(a) A description of any opportunities, constraints, or negative externalities associated with adoption of the elements of proposed Housing Production Strategies;

The Department's review of the city's HPS report found that the required analysis, as outlined in OAR 660-008-0050(5)(a), is missing. Specifically, the report does not explicitly describe the opportunities, constraints, or negative externalities for each individual action. While some action category introductions make minimal references that suggest these elements were considered, they are presented inconsistently and in

an aggregated format. Department staff also infer that these elements were discussed during the Cross-Jurisdictional Technical Advisory Committee and Multi-Bureau Internal Working Group meetings, which helped narrow and refine the selected actions. However, this remains an inference without explicit mention in the report.

The rule requires this analysis to be addressed at the action-by-action level, not as a collective overview. The lack of explicit, clear descriptions makes it difficult to evaluate these factors, particularly negative externalities, which are essential for achieving equitable outcomes and minimizing unintended harm.

The Department will accept the current HPS report, but this represents weak compliance with OAR 660-008-0050(5)(a). To fully meet the rule, the city must provide a clear description of opportunities, constraints, and negative externalities for each action. This analysis should be included either within the action-by-action section of the HPS report or as a separate chapter or section, similar to the Benefits and Burdens Assessment chapter. Future HPS updates must explicitly address this requirement on an action-by-action basis, and this will be enforced in the city's next update.

(b) A description of actions that the city and other stakeholders must take to implement the proposed Housing Production Strategies;

In the chapter titled "*New Strategies to Meet Future Housing Need*" within the city's HPS Report, a subchapter titled "*New Strategies by Lead Bureau*" highlights the collaborative nature of the actions outlined in the HPS. The city acknowledges that successful implementation will require coordination and partnership among multiple bureaus. As the city moves forward with implementation, it is recommended that the exhibit on page 17 of the HPS report be shared with each identified partner. This should serve as a foundation for developing a more detailed and actionable implementation plan in collaboration with all involved stakeholders.

Portland Housing Bureau (PHB) • Replace Housing Bonds Revenue Source • Create New Tax Increment Financing (TIF) Districts • Leverage Other State and Federal Funding Sources • Establish a Comprehensive Citywide Land Banking Strategy • Rezone Sites For Affordable Housing • Review and Update Inclusionary Housing (IH) Program • Update Short Term Rental Nightly Fee • Expand Homeownership Programs • Preserve Existing Affordable Housing • Launch Affordable Housing Listing Service	Bureau of Planning and Sustainability (BPS) • Rezone Sites for Affordable Housing • Increase Housing Capacity in Inner Centers & Corridors • Revise Zoning Bonuses and Incentives • Increase Housing Capacity in the Central City • Identify Housing Opportunity Along 82nd Avenue • Incorporate Affirmatively Furthering Fair Housing • Implement Accessible Housing Production Strategies • Educate on Opportunities for Aging in Place & Community • Support Mass Timber and Modular Innovations • Develop Low Carbon Building Policies • Implement Heat Adaptation Recommendations
Prosper Portland • Create New Tax Increment Financing (TIF) Districts • Create New Middle-Income Financial Incentives • Implement and Support Catalytic Investments • Kickstart Housing Demand in Central City • Promote Commercial to Residential Conversion / Adaptive Reuse • Explore Infrastructure Investments and Strategies	Infrastructure Bureaus: Portland Bureau of Transportation (PBOT) / Portland Water Bureau (PWB) / Bureau of Environmental Services (BES) / Portland Parks and Recreation (PPR) • Revise System Development Charges (SDC) • Promote Increased Transit Service
Permitting and Development (PP&D) • Improve Middle Housing Permit Process • Implement Regulatory Reform Project • Improve User Experience within Permitting Systems • Reform Development Services Funding Model	Office of Government Relations (OGR) • Advocate for Funding for Production and Preservation • Advocate for Regulatory and Code Changes to Meet Housing Need • Advocate for Policy that Supports the Building of Resilient Homes

(c) If the Housing Production Strategy Report is the first produced under this division, a description of how the city will measure strategy implementation and progress;

The city includes a chapter titled “Monitoring Progress” in the HPS report that describes the proposed metrics for monitoring progress at the action category level.

Condition of Approval #2: The Department is particularly interested in how the city will monitor the implementation of all proposed actions within each action category on an annual basis as described in Figure 10 (included below). The Department requests that, at the time the city submits its three-year, mid-cycle narrative report to the department under OAR 660-008-0060, the city provides all annual monitoring summaries to the department. These annual summaries are not required as part of the submittal under OAR 660-008-0060 and therefore will not be used to make any final approval decisions. Rather, DLCD is interested in these summaries for informational and educational purposes.

Figure 10. Proposed Metrics for Monitoring Progress

A. Promote Affordable Housing (0-80% AMI) • # of units by affordability (ACS/PUMS) • # of affordable units (0-80% AMI) produced • Average \$ investment per rental housing unit • Average \$ State and Federal funds invested per local \$	B. Increase Middle Income Housing and Homeownership • Change in # of ownership units (ACS) • # of ownership units built using TIF • Amount of \$ awarded for Middle-Income development • \$ used for homeownership programs
C. Increase Access To Opportunity / G. Promote Climate Friendly and Healthy Homes • % of new housing in complete neighborhoods • % of new housing in high opportunity areas • # of units produced within RCAA/RECAP • # of units produced within centers and corridors • % of new housing in low carbon neighborhoods	D. Reduce Barriers to Development and Improve Processes • # of days from application submittal to approved to issue • # of review cycles • Increased customer satisfaction via survey • % of teams meeting 1st and 2nd review goals
E. Stabilize Current and Future Households • # of PSH units built • # of HHs provided legal services for housing access and stabilization • # of HHs supported in HH level programs • % of BIPOC HHs provided legal services • \$ Amount of supportive services funding aligned with actual costs for property management, service delivery, and other operating needs • \$ Amount of funding for preservation and rehabilitation • # and distribution of severely cost burdened households • # of units produced within economically vulnerable tracts • # of regulated affordable units preserved through rehabilitation and/or new regulatory agreements	F. Promote Age and Disability Friendly Housing • # of accessible units permitted and produced • # of middle housing units permitted and produced

(d) If the Housing Production Strategy Report is not the first produced under this section, a summary of strategies that the city has previously adopted and implemented, and a reflection on the efficacy of each implemented strategy; and

Not applicable.

(e) A copy of the city's most recently completed survey to meet the requirements of ORS 456.586.

The city of Portland submitted a survey to meet the requirements of ORS 456.586 to DLCD and attached it in Appendix D with the submitted HPS.

We truly appreciate the dedication and hard work the city has invested in the development of the HPS. Our commendations go out to the city for their ongoing commitment to ensuring fair and equitable housing options and outcomes. We are eager to continue our partnership with the city in the future as we work together toward this shared goal. Please feel free reach out to Housing Planner, Celestina Teva, at 503-383-6816, or at celestina.teva@dlcd.oregon.gov if you have any questions or need further assistance.

Sincerely,

A handwritten signature in black ink, appearing to read "Ethan Stuckmayer". The signature is fluid and cursive, with a long horizontal stroke at the end.

Ethan Stuckmayer

Housing Division Manager, Department of Land Conservation and Development

Cc: Brenda Bateman, DLCD
Kirstin Greene, DLCD
Kelly Reid, DLCD
Celestina Teva, DLCD
Mari Valencia-Aguilar, DLCD
Ingrid Caudel, DLCD



9/12/2024

LiveAble Homes submits the following written commentary to the DLCD on the City of Portland Housing Production Strategy.

LiveAble Homes specializes in designing, developing, and certifying accessible homes in the Portland Metro area. We are an expansion of the Lifelong Housing Program in Southern Oregon through the Rogue Valley Council of Governments that has certified over 200 homes. As community leaders in accessible design and through our partnerships with local non-profits, builders and aging/disability advocates, we know that the lack of accessible and affordable options for housing in our state has created hardship for many of our most vulnerable residents who are aging, living with a disability (physical, mental or cognitive) or both. We support the adoption of the Housing Production Strategy (HPS) by the Bureau of Planning and Sustainability (BPS) and are excited to support the City of Portland and BPS in plans to prioritize housing for those who are aging and/or have a disability.

In order to achieve the goals of the HPS, we have outlined the following recommendations:

THE NEEDS

“The City must plan to accommodate Portlanders with a diverse range of needs in terms of unit types and prices in locations that help meet the needs of all, including low-income populations, communities of color, and people of all ages and abilities.”

HPS - Page 9

The current draft of the HPS states, on page 47, that *“approximately a quarter of all households in Portland have at least one family member with a disability and over 13 percent of the population is over the age of 65, and these numbers are forecast to increase.* The HPS community engagement also identified a need for specific actions such as updating incentives in the zoning code and developing a comprehensive source of information for developing housing that allows ageing households to age in community. ... These strategies promote age and disability friendly housing and increase Portland’s ability to ensure equitable access to housing, making a special effort to remove disparities in housing access for people with disabilities and older adults.”

- 63,541 houses currently exist with older residents and 22,126-27,314 homes are needed (page. 13).
- Of these homes with a resident 65 or over, 33% have at least one disability (p.12).
- 65,279 households currently have at least one person with a disability and 21,777-26,318 more accessible homes are needed

The growing need for truly accessible homes is staggering. It is important to note that these numbers do NOT include households that may not have a current aging or disabled resident but who have visitors that are unable to have barrier-free access to their homes. We know that bodies fail and that accidents happen. Homes that do not have a resident with a disability today, may easily have one tomorrow and access to that home needs to be supported.

THE GOALS

Sections E and F lay out strategies for addressing the identified needs found in the HPS. These 2 areas align specifically with the work LiveAble Homes is currently doing to assess, identify and track accessible units in the Portland area.

NEW STRATEGIES – HPS, Section E.2 - page 47

Launch Affordable Housing Listing Service In partnership with local housing providers and other jurisdictions

The City will establish an affordable housing listing service to help low-income households better access affordable housing opportunities. The City will be conducting a request for professional services for an affordable housing listing service to kick-off these efforts. The service would allow households to search for opportunities by geography and accessibility needs

NEW STRATEGIES – HPS, Section F - page 48

1. Implement Accessible Housing Production Strategies

The City aims to reduce the financial, regulatory, and institutional barriers to developing needed accessible housing in the aging city.

- Review and revise Chapter 33.229 Elderly and Disabled High Density Housing to consider relevancy and use as well as the opportunity to target middle housing.
- Revise visitable units bonus (33.120.211.C.4) to incentivize the increased development of visitable and accessible units that meet Universal Design, **Oregon Lifelong Housing Certification**, and other similar standards.
- Create an accessible housing inventory – BPS, PHB and PP&D will work together to identify opportunities to fund and support the work of creating an accessible housing inventory in order to better understand the gap in accessible housing. The City will explore programmatic opportunities to connect households to units (D3).

2. Educate on Opportunities for Aging in Place & Community

Provide technical assistance on incremental housing development guidelines to enhance aging in place/community (e.g., zero-step entrances, universal design, adaptable housing, affordable neighborhood-based housing models).

Create programs to support two types of development:

- Retrofits to allow households to age in community/place.
- Middle housing opportunities for aging in community

THE SOLUTIONS

- **ADVOCATE FOR INCREASED ACCESSIBILITY**
HPS Section H.2 - page 53

WORK WITH STATE LEGISLATORS TO DEFINE ACCESSIBILITY AT THE HIGHEST LEVEL

LiveAble Homes supports City Council and BPS' engagement in advocacy efforts at the state level as referenced in Section H.2 on page 54. Currently, the Oregon Structural Specialty Code defines 'Accessible unit' as follows: **“dwelling unit or sleeping unit that complies with this code and provisions for Accessible units in ICC A117.1, Section 1102”**.

At the higher end of the accessibility spectrum, in ICC A117.1, one finds “Type A Units” or “Visitable” with some accessible features and “Type B and C units” with more accessible

features. However, “UFAS Units,” which are the most accessible units of all and constructed according to the Uniform Federal Accessibility Standards (UFAS), are required under Section 504 of the federal Rehab Act.

We believe that the emphasis on "quality" should be tied to the highest definition of “Accessible units” found in UFAS which includes "Communications Units" for people who are deaf/blind. Because of this, LiveAble Homes supports the definition of “Accessible Unit” to being worded in the following way:

“Accessible unit,” for purposes of ORS 456.515 and ORS 456.571, means a dwelling unit designed and constructed for accessibility in accordance with the design and construction requirements for dwelling units reflected in the Uniform Federal Accessibility Standards (UFAS).

Add back in this removed wording from SECTION F.1 of the original February 2024 draft -page 19

"Convene officials to discuss legislation that increases jurisdictions’ ability to regulate and incentivize accessible housing."

- **EDUCATE ON OPPORTUNITIES FOR AGING IN PLACE & COMMUNITY**
HPS Section F.2 – page 48

LiveAble Homes provides educational opportunities for accessible design in environments ranging from individual homeowners to senior centers to residential construction building associations. In addition, our recent integration into the RMLS system used by the real estate industry allows us to directly target education efforts to builders and developers and over 14,000 Realtors– all critical players in the increased efforts to create more accessible housing inventory.

- **CREATE AN ACCESSIBLE HOUSING INVENTORY**
HPS Section F.1 - page 48

The tool used by LiveAble Homes (Lifelong Housing Checklist) has already been identified in the HPS as a tool for identifying visitable and accessible units that meet state, national and international residential building standards on accessibility.

“Revise visitable units bonus (33.120.211.C.4) to incentivize the increased development of visitable and accessible units that meet Universal Design, **Oregon Lifelong Housing Certification**, and other similar standards.”

Homes in the Portland area and throughout Oregon are currently being assessed and certified to these standards. In addition, we are currently drafting agreements with area builders in Oregon to design and certify new construction. Partnering with LiveAble Homes and the LiveAble Homes Certification program, means that BPS and City of Portland can immediately implement this strategy without waiting for the 2028 timeline identified on page 20. This existing certification program will allow the City of Portland to identify, certify and track the accessible units within the city limits, meeting the metric identified in Figure 10, section F on page 55,

F. Promote Age and Disability Friendly Housing

- # of accessible units permitted and produced
- # of middle housing units permitted and produced

At LiveAble Homes, we understand that policy, construction and design decisions are often made to allow for the highest level of cost and systems efficiency. If DLCD does not clearly state Housing Production Strategy expectations of the highest level of accessibility and affordability and *INCENTIVIZE* those standards, builders and designers will commonly choose ease over effort. Clearly stated expectations and incentives in collaboration with actionable oversight, certification and tracking will allow DLCD to access qualifiable and quantifiable data to show compliance with the stated metrics for monitoring progress. We, at LiveAble Homes, look forward to partnering with DLCD and the City of Portland to meet those metrics.



Jackie Haddon, Beth Kellan, and Jennie Vinson

Co-Founders of LiveAble Homes LLC

www.liveablehomes.org





Oregon
Environmental
Council



Interfaith
Alliance on
Poverty



Oct. 26, 2024

To the Oregon Department of Land Conservation and Development:

We write in support of Portland's 2024 Housing Production Strategy. We were pleased that after extensive public engagement, the city's approved strategy included many more specific actions than earlier drafts had. Portland's HPS transformed from a wishlist into a to-do list. However, to help Portland meet one of its self-imposed deadlines, we recommend in this letter that DLCD approve the strategy subject to at least one small condition.

Our recommendation focuses on item C2, "Increase Housing Capacity in Inner Centers & Corridors." Our coalition has urged the City of Portland to scope and launch a zoning project that would consider legalizing low- to mid-rise apartment buildings on all residential lots in the walkable, opportunity-rich neighborhoods of Portland's Inner Eastside: roughly from 12th to 60th and Fremont to Powell. We believe this can help build a city with more abundant, affordable, and accessible housing for tenants and homebuyers while helping reduce homelessness, displacement, and energy use.

Item C2 is less detailed than our proposal, but is compatible with it. We appreciate the city's commitment to "initiate an area plan project" that would "increase housing capacity in high-opportunity neighborhoods to promote fair housing, address racial segregation, and expand affordable housing options."

Because being able to add homes to desirable areas is fundamental to so many other city housing goals, timely completion of Item C2 would boost the effectiveness of many other items in Portland's strategy: A1, A2, A5, A6, B1, B3, C7, C8, D4, F2, G1, G2, G4, H1, and H3.

This is why we call the state's attention to one small detail in Item C2: its "project start" is listed as "July 2024," a date that has already passed. This is reasonable in the sense that Item C2 also includes a preliminary infrastructure capacity study that began earlier this year. However, that infrastructure study is not a politically difficult action, nor will it deliver much public benefit in itself.

If Portland is going to actually meet its self-imposed adoption deadline of July 2028 (a deadline that, notably, falls *after* the city's coming mid-cycle HPS review), it will need to "initiate an area plan project" very soon after the infrastructure study is complete in mid-2025. An earlier draft of the HPS briefly set a start date of July 2025; that date is missing from the city-approved HPS.

The dates listed for Item C2 are reasonable for the item as a whole. But for the purposes of Portland's upcoming mid-cycle check-in, we urge DLCD to hold the city to an implicit commitment to take up the second step of Item C2 promptly after its completion of step one. We recommend that DLCD approve the HPS subject to the common-sense change of restoring the July 2025 start date for the "area plan project" in Item C2. A timeline like this will be necessary for the city to meet its July 2028 commitment to improve housing choice in these opportunity-rich Oregon neighborhoods.

Portland: Neighbors Welcome and our fellow signatories:

1000 Friends of Oregon
APANO
Bike Loud PDX
Fair Housing Council of
Oregon
Habitat for Humanity
Portland Region
Home Forward
Housing Land Advocates

Housing Oregon
Advocacy Team, Interfaith
Alliance on Poverty
Lloyd EcoDistrict
No More Freeways
Oregon Environmental
Council
Oregon Smart Growth
Oregon Walks

ROSE Community
Development
Sightline Institute
Southeast Uplift
neighborhood coalition
Strong Towns PDX
Sunrise Movement PDX
The Street Trust
Verde