

Housing Planning in Cities under 10,000

How do small cities plan for housing under Goal 10?

Housing planning in Oregon is guided by Statewide Planning Goal 10: Housing, which requires that each city has enough residential land to support its housing needs over the next 20 years. Cities comply with Goal 10 by completing a **Housing Capacity Analysis (HCA)**, formerly called a Housing Needs Analysis (HNA), which is a document adopted into a city's comprehensive plan and used as the basis to make land use decisions related to housing.



Why do we need a Housing Capacity Analysis?

A Housing Capacity Analysis shows whether existing buildable land can meet a community's housing needs. It can help a local government understand how prepared it is to accommodate its community's housing needs in the long term so that it can respond accordingly. It can also help inform updates to a city's comprehensive plan to guide future residential development as the city grows and annexes land.

Requirements for a city under 10,000 people outside Tillamook County

Cities under 10,000 people outside Tillamook County can adopt an HCA at any time and are not required to update the analysis on any regular schedule or by a certain deadline. However:

1. If the city already has an HCA or HNA adopted into a city's comprehensive plan and is not pursuing an urban growth boundary expansion, no further action is required.
2. If the city is in the process of planning for a residential urban growth boundary expansion, the city can use previous process and requirements (OARs) in place before January 1, 2025, or January 1, 2026, so long as the city submits the adopted amendment to DLCD on or before January 1, 2027. Requirements necessary to adopt under the previous process and rules:
 - a. Buildable Land Inventory
 - b. Residential Land Needs Analysis, *based on the Population Research Center's 20-year population forecast*
 - c. Land Sufficiency
 - d. Response to a land deficiency (through efficiency measures, UGB amendment, or a combination of efficiency measures and a UGB amendment), if applicable
3. If the city will adopt a residential urban growth boundary expansion after January 1, 2027, the city is required to complete the following:
 - a. Buildable Land Inventory
 - b. Residential Land Needs Analysis, *based on the State's Oregon Housing Needs Analysis allocation*
 - c. Land Sufficiency
 - d. Response to a land deficiency (through efficiency measures, UGB amendment, or a combination of efficiency measures and a UGB amendment), if applicable.



Elements of the Housing Capacity Analysis

How much housing do we need?

Needed Housing Allocation

The [Oregon Housing Needs Analysis \(OHNA\)](#) is the state's methodology for estimating and allocating housing needs to all cities in the state. The state provides allocated housing need data to cities as the basis for the Housing Capacity Analysis. In the previous Goal 10 process, cities used the 20-year population forecast to estimate need. The allocation includes the number of units a city needs over the next 20 years. The allocation is segmented by income bracket to ensure cities plan for housing needs for all income levels. Further analysis and community engagement will help a city determine the housing types and densities that are needed locally.

Collaborators

- Local government staff and officials
- Regional partners and other public entities

How much land do we have for housing?

Buildable Land Inventory

The Buildable Land Inventory (BLI) estimates how much land is available for additional housing, including vacant land and redevelopment opportunities. It also identifies land that should not be included, such as areas constrained by natural resources and hazards.

How much land do we need for housing?

Residential Land Needs Analysis

This step involves determining how much and what kind of land a community requires to support the development of needed housing over the next 20 years. This analysis considers not just the amount of housing needed based on the allocated housing need but specifically the types of housing that it needs.

Do we have enough land capacity for housing over the next 20 years?

Land sufficiency

This step involves comparing the BLI to the Residential Land Needs Analysis to determine whether there is enough land capacity. For example, if a city has a shortage of multi-unit housing such as apartments, is there enough land in its boundary that allows for that housing type?

If not, what can we do?

Remedy a residential land need, as needed

If there is not enough land capacity to support needed housing, small cities can take action to remedy the deficit through:

- Measures to increase efficiency of land inside the boundary,
- Amending the urban growth boundary to add more land for housing, or
- A combination of both



Finalization and Review

Deliverable	Completion Method	Does this require a land use decision?
Housing Capacity Analysis, including: • Determination of needed housing • Buildable Land Inventory • Residential Land Needs Analysis • Land Sufficiency • Remedy to address a land need, if necessary	• Adopted locally into the Comprehensive Plan • Submitted to DLCD as a Post-Acknowledgement Plan Amendment (PAPA)	Yes



Housing Planning for Cities under 10,000

HB 2889 (2023): Understanding the January 1, 2027 deadline

Some cities in Oregon had begun their housing planning work prior to the effective date of HB 2001 (2023) and HB 2889 (2023) and may currently be working to complete this planning work. Because HB 2001 and HB 2889 changed the state laws related to how this planning work must be completed, the legislature adopted provisions allowing work already underway to continue as planned in an effort to avoid “surprising or unjust results”. Per HB 2889 (2023) §7 (4), and by temporary rules adopted by the Land Conservation and Planning Commission (LCDC), cities may adopt plan amendments, including the analysis required for a UGB amendment and the UGB amendment decision, that comply with the applicable rules in place prior to recent changes so long as the local government submits the adopted amendment to DLCD on or before January 1, 2027. Analysis supporting a UGB decision includes all elements of a city’s Housing Capacity Analysis (HCA) and the Buildable Lands Inventory (BLI).



Housing Planning Activities Currently Underway

Statute and temporary rules (OAR 660-008-0001, 660-021-0080, 660-024-0001) allow all local governments to progress towards completion of planning work that complies with the previous planning framework until January 1, 2027:

- Housing Capacity Analysis including the determination of needed housing, buildable lands inventories and capacity estimates, Residential Land Needs Analysis, and the comparison of residential land need and housing capacity;
- The establishment of Urban Reserves to meet needs identified in a previously adopted Housing Capacity Analysis
- Adoption of an Urban Growth Boundary amendments to meet needs identified in previously adopted Housing Capacity Analysis

DLCD will only review submissions of the adopted amendments above against the applicable rules in place prior to January 1, 2026 if the submission is made to the department on or before January 1, 2027. Per HB 2889, submissions of the elements above made to the department after January 1, 2027 will only be reviewed against the applicable rules as adopted by the Land Conservation and Development and in effect as of January 1, 2026. Submission of adopted amendments must be made to the department as provided in OAR 660-018-0040.

What this means after January 1, 2027

Statute and temporary rules represent a hard cutoff date for old and new planning paradigms. Any adoption of Goal 10 or Goal 14 elements after January 1, 2027 must comply with the rules in effect currently. Any housing planning activities currently underway that are not adopted and submitted to the department by January 1, 2027 are likely to be out of compliance with the new planning paradigm. In this scenario, the local government may be required to start the analysis over or otherwise make major updates to work already completed to ensure it meets current planning obligations and requirements.

