



PERMANENT ADMINISTRATIVE ORDER

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CHAPTER 660
LAND CONSERVATION AND DEVELOPMENT DEPARTMENT

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FILING CAPTION: Update Housing Capacity Analysis Schedule

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AMEND: 660-008-0045

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RULE SUMMARY: The Attachment in OAR 660-008-0045 contains the schedule by which certain local governments are required to adopt updated housing capacity analyses. The schedule is required to comply with HB 2003 [2019] and implement Oregon Revised Statute 197A.270(2)(b).

CHANGES TO RULE:

660-008-0045

Update Housing Capacity Analysis Deadline Schedule

Cities described in ORS 197A.270, 197A.280, and 197A.335 shall adopt a housing capacity analysis and adopt a housing production strategy as scheduled by the commission.¶¶

(1) The department shall publish the schedule of housing capacity analyses and housing production strategies deadlines for cities identified under ORS 197A.270, 197A.280, and 197A.335 in Attachment A.¶¶

(2) The deadline for adoption of a housing capacity analysis and a housing production strategy in a given year is December 31st.¶¶

(3) The department will consider a city to have met its obligation to adopt a housing capacity analysis upon adoption of the housing capacity analysis by ordinance. The department will not consider a subsequent appeal of the city ordinance adopting its housing capacity analysis a failure to comply with the deadline provided in Attachment A provided in section (1).¶¶

(4) The department will consider a city to have met its obligation to adopt a housing production strategy upon adoption of the housing production strategy. As provided in ORS 197A.100(7), the adoption of a housing production strategy is not a land use decision and is not subject to appeal or review except as provided in ORS 197A.103.¶¶

(5) Upon adoption of a housing capacity analysis, the deadline for a subsequent housing capacity analysis is as follows:¶¶

(a) Eight years subsequent for cities that are not within Metro; or¶¶

(b) Six years subsequent for cities that are within Metro.¶¶

(6) The housing production strategy is due one year after the city's deadline for completing a housing capacity analysis, as prescribed in section (1).¶¶

(7) The applicable allocation of housing need and housing production target, as provided in ORS 184.451 to 184.455, are those that are most recent in the year of the adoption of the housing capacity analysis. ¶¶

(8) If a population estimate developed under ORS 195.033 and OAR 660-032-0020 and OAR 660-032-0030

results in a city qualifying under ORS 197A.270, 197A.280, and 197A.335, the city must adopt a housing capacity analysis within two years of its qualification or the interval provided in section (5), whichever is the longer period.

Statutory/Other Authority: ORS 197.040

Statutes/Other Implemented: ORS 197A.015 - 197A.470

RULE ATTACHMENTS MAY NOT SHOW CHANGES. PLEASE CONTACT AGENCY REGARDING CHANGES.

Housing Capacity Analysis and Housing Production Schedule

OAR 660-008-0045 Attachment A

(Required by ORS 197A.270, 197A.280, and 197A.335)
Last Updated February 28, 2025

This schedule is to be adopted by the Land Conservation and Development Commission (LCDC) in January of each year. Cities must adopt a Housing Capacity Analysis (HCA) and a Housing Production Strategy (HPS) by December 31st of the listed year.

HCA-HPS Schedule for 2025-2033

	2025	2026	2027	2028	2029	2030	2031	2032	2033
Cities in a Metro Service District (six-year cycle)									
Beaverton					HCA	HPS			
Cornelius			HCA	HPS					HCA
Fairview			HCA	HPS					HCA
Forest Grove			HCA	HPS					HCA
Gladstone			HCA	HPS					HCA
Gresham					HCA	HPS			
Happy Valley	HPS			HCA	HPS				
Hillsboro					HCA	HPS			
Lake Oswego					HCA	HPS			
Milwaukie					HCA	HPS			
Oregon City			HCA	HPS					HCA
Portland					HCA	HPS			
Sherwood			HCA	HPS					HCA
Tigard			HCA	HPS					HCA
Troutdale			HCA	HPS					HCA
Tualatin			HCA	HPS					HCA
West Linn	HPS				HCA	HPS			
Wilsonville	HPS					HCA	HPS		

	2025	2026	2027	2028	2029	2030	2031	2032	2033
Metro Counties (HB 4063, 2024) (six-year cycle)									
Clackamas					HCA	HPS			
Washington					HCA	HPS			

	2025	2026	2027	2028	2029	2030	2031	2032	2033
Housing Coordination Strategy (HCS) (six-year cycle)									
Metro Regional Government	HCS						HCS		

	2025	2026	2027	2028	2029	2030	2031	2032	2033
Cities outside of Metro Service Districts (eight-year cycle)									
Albany				HCA	HPS				
Ashland						HCA	HPS		
Astoria			HCA	HPS					
Baker City						HCA	HPS		
Bend			HCA	HPS					
Canby*	HPS							HCA	HPS
Central Point			HCA	HPS					
Coos Bay				HCA	HPS				
Corvallis			HCA	HPS					
Cottage Grove			HCA	HPS					
Dallas				HCA	HPS				
The Dalles							HCA	HPS	
Eugene			HCA	HPS					
Grants Pass						HCA	HPS		
Hermiston					HCA	HPS			
Independence							HCA	HPS	
Keizer			HCA	HPS					
Klamath Falls				HCA	HPS				
La Grande				HCA	HPS				
Lebanon						HCA	HPS		
Lincoln City			HCA	HPS					
McMinnville*	HPS							HCA	HPS
Medford							HCA	HPS	
Molalla	HPS						HCA	HPS	
Monmouth							HCA	HPS	
Newberg			HCA	HPS					
Newport						HCA	HPS		
North Bend						HCA	HPS		
Ontario					HCA	HPS			
Pendleton*	HCA	HPS				HCA	HPS		
Prineville			HCA	HPS					
Redmond			HCA	HPS					
Roseburg			HCA	HPS					
Salem	HPS					HCA	HPS		
Sandy	HPS							HCA	HPS
Silverton				HCA	HPS				
Springfield			HCA	HPS					
St. Helens			HCA	HPS					
Sweet Home							HCA	HPS	
Woodburn			HCA	HPS					

	2025	2026	2027	2028	2029	2030	2031	2032	2033
Cities and SB 406 (2023) named communities in Tillamook County (eight-year cycle)									
Bay City			HCA	HPS					
Garibaldi			HCA	HPS					
Nehalem			HCA	HPS					
Manzanita			HCA	HPS					
Rockaway Beach			HCA	HPS					
Tillamook			HCA	HPS					
Wheeler			HCA	HPS					
Unincorporated Communities**			HCA	HPS					

*City under approved DLCD workplan.

**Tillamook County's unincorporated communities included in the HCA/HPS work of ORS 197.296 include: Barview/Twin Rocks/Watseco, Cloverdale, Hebo, Neahkanie, Neskowin, Netarts, Oceanside, and Pacific City/Woods

HCA or HPS noted in green font indicates cities that have received approved deadline extensions for either deliverable.

Important Revisions in the 2025 HCA and HPS Schedule Update

Pursuant to OAR 660-008-0045, cities with a population of 10,000 or greater, determined by a certified population estimate from the Portland State University Population Research Center, must adopt an HCA on a regular schedule. Cities have the flexibility to adopt an HCA at any time before the scheduled year. Note #4 on the adopted HCA Schedule from November 2020 specifies, 'Those cities that adopt an HCA prior to their listed deadline will reset the schedule.' Cities within a metropolitan service district will renew 6 years after the actual adoption date, while cities outside of a metropolitan service district will renew 8 years after the actual adoption date. For example, the city of Salem adopted an HCA in 2022, and thus will adopt a subsequent HCA 8 years later, in 2030.

Pursuant to ORS 197A.100, a city's HPS must be completed by December 31st one year after the city's HCA adoption deadline. Cities can opt for early HCA adoption, resetting the timing for the next analysis to six or eight years from the most recent adoption year. However, it does not alter the deadline for completing the associated HPS, which remains due one year after the initial HCA deadline. For the subsequent adoption cycle, the new HCA deadline determines the deadline for completing the next HPS. Cities may also request an extension under OAR 660-008-0310. In that circumstance, the extension does not alter the subsequent deadline – it remains 8 years after the original deadline.

Additionally, on December 15th each year, the Population Research Center at Portland State University publishes certified population estimates for every city and county in Oregon. These estimates are used by the Department to determine whether a city has surpassed the 10,000-population threshold, subjecting them to the Housing Capacity Analysis and Housing Production Strategy Program. In the estimates published on December 15, 2024, no cities were certified to newly meet or exceed this threshold.

Recent legislation, including Senate Bill 406 (2023) and House Bill 4063 have directed the requirements of an HCA and HPS not only to cities with populations of 10,000 or greater but also to:

- All cities within Tillamook County, as well as the communities of Barview/Twin Rocks/Watseco, Cloverdale, Hebo, Neahkahnie, Neskowin, Netarts, Oceanside, and Pacific City/Woods, regardless of population size.
- Counties with jurisdiction over Metro urban unincorporated lands.

Additionally, House Bill 2001 (2023) established a new requirement for Metro Regional Government to develop a Housing Coordination Strategy on a six-year cycle in alignment with the cycles for cities in the Metro required to develop an HCA and HPS.

Cities Granted Extension in 2024

Several cities were granted deadline extensions into the following calendar year, 2025. Cities granted extensions in 2024 include:

- Happy Valley
- West Linn
- Pendleton
- Salem

City of Pendleton Update:

The City of Pendleton did not meet its initial HCA deadline of December 31, 2022 nor the mutually agreed-upon modified deadline of December 31st, 2023. In 2024, in accordance with OAR 660-008-0310, the City is now under a work program with a DLCD-provided consultant to bring them back into compliance. The new deadlines require Pendleton to adopt its HCA and HPS no later than December 31, 2025. After this cycle, the city will return to its original eight-year schedule, with the next HCA due in 2030 and HPS in 2031.

HCA and HPS Notes on Administration:

1. The deadline for adoption in any given year will be December 31.
2. A city fulfills its obligation to adopt the HCA update upon local-level adoption by ordinance. Any subsequent appeal does not constitute a failure to comply with the update requirement.
3. The date of final adoption of the HCA at the local level will establish the next HCA update deadline. The subsequent update deadline will be six or eight years in the future, contingent on whether the city is within the Metro boundary.
4. Cities adopting an HCA before the listed deadline effectively "reset the clock," with the next applicable HCA deadline set six or eight years after the early adoption, based on Metro boundary inclusion.
5. The Land Conservation and Development Commission (LCDC) completed rulemaking on housing production strategies (HPSs) in the fall of 2020 and adopted HPS rules as amendments to OAR Chapter 660, Division 8 on November 12, 2020.
6. Notably, the city must adopt the HCA by ordinance for the HCA update deadline to be met, typically as a supporting document to the city's comprehensive plan. Adoption by ordinance enables city decision-makers to utilize the HCA as a legally defensible basis for decision-making.
7. Consistent with OAR 660-024-0050(4), a city must address a land deficit identified in the HCA before or concurrently with HCA adoption. The local government must amend the plan to satisfy the need deficiency, either by increasing the development capacity of existing land within the city, expanding the Urban Growth Boundary (UGB), or both.
8. A city that adopts an HCA after December 31, 2021 but in a year that is prior to the deadline established in this schedule is required to complete a Housing Production Strategy one year after the city's established HCA deadline. A city may complete a Housing Production Strategy prior to the established deadline.
9. Consistent with OAR 660-008-0045(4), the department will consider a city to have met its obligation to adopt a housing production strategy upon adoption of the housing production strategy. As provided in ORS 197A.100(7), the adoption of a housing production strategy is not a land use decision and is not subject to appeal or review except as provided in ORS 197A.103.
10. Consistent with OAR 660-008-0045(7), the applicable allocation of housing need and housing production target, as provided in ORS 184.451 to 184.455, are those that are most recent in the year of the adoption of the housing capacity analysis.