

November 7, 2025

Land Conservation and Development Commission  
Chair Anyeley Hallová  
635 Capitol St., Ste. 150  
Salem, Oregon 97301

**RE: Oregon Housing Needs Analysis (OHNA) Rules**

Dear Chair Hallová and Members of the Land Conservation & Development Commission:

On behalf of Oregon Just Transition Alliance (OJTA) and its partners, we submit these comments in general support for the proposed OHNA rules.<sup>1</sup> OJTA is a statewide alliance of communities facing environmental racism, climate change, and economic exploitation. We represent frontline communities who experience disproportionate housing instability, including folks with disabilities, rural families, people of color, and low-income Oregonians.

In the past five years, we've faced a worldwide pandemic, wildfires unlike anything we've seen before, and an unprecedented heat wave that took the lives of more than 100 people. While many of us have been affected, frontline communities are more likely to be displaced or live in substandard housing after climate shocks<sup>2</sup> due to disproportionate environmental challenges like wildfire and storm risk.<sup>3</sup> How and where Oregon invests and builds in housing will make communities resilient to the next crisis, and that's why the OHNA rules are so important to the communities we represent.

The current proposed rules are the result of a rulemaking process that has occurred over the past two years. They represent a historic step forward because they begin to address the deep harm of decades of exclusionary housing practices through a collaborative process that brought together many stakeholders and incorporated feedback from cities on how to make the rules more practical and effective. We appreciate these contributions and recognize that cities are one of several key partners in implementing OHNA. At the same time, it is important to remember the other key partners in this endeavor include those most likely to build and live in this housing.

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<sup>1</sup>[https://secure.sos.state.or.us/oard/displayDivisionRules.action;JSESSIONID\\_OARD=k\\_aamkTx88l0QIHKa7T1lrtR11S3Gv4Rp1XeMbuGvy1AmyV4qmzf!-1550591806?selectedDivision=3058](https://secure.sos.state.or.us/oard/displayDivisionRules.action;JSESSIONID_OARD=k_aamkTx88l0QIHKa7T1lrtR11S3Gv4Rp1XeMbuGvy1AmyV4qmzf!-1550591806?selectedDivision=3058)

<sup>2</sup>[https://www.urbandisplacement.org/wp-content/uploads/2021/08/climate\\_and\\_displacement\\_-\\_lit\\_review\\_6.19.2020.pdf](https://www.urbandisplacement.org/wp-content/uploads/2021/08/climate_and_displacement_-_lit_review_6.19.2020.pdf)

<sup>3</sup><https://psci.princeton.edu/tips/2020/8/15/racial-disparities-and-climate-change>.

OHNA has a visionary set of rules that we must adopt. Chief among them are to ensure cities build enough housing, that the housing is affordable, and that the housing options offer real choice to people. It is a long-term, flexible framework designed to remain durable enough to guide housing production statewide for years to come.<sup>4</sup> The rules “emphasize fair housing outcomes, environmental justice, climate mitigation and resilience, and access to opportunity, and sustainability.” Building homes with this in mind can begin to right historic housing injustices that frontline Oregonians have faced, and we must keep these rules strong in order to mitigate the housing crisis in Oregon.

Proposed OAR 660-008-0075 (Contextualized Housing Need) represents a big win for communities who have been kept out of neighborhoods and resources due to past discriminatory housing practices. The proposed rule requires cities to do a localized analysis of both quantitative and qualitative data that shows the housing type, characteristics, locations of housing needed with a focus to address fair housing issues, protected classes, and other priority populations named in this statute who are experiencing inequitable housing outcomes to ensure fair housing practices. Oregon should feel proud to have this in statute to solidify our values in practice. The status quo has failed those facing the greatest barriers, which is why these changes are necessary, even if additional analysis or planning is required.

Another visionary and important part of OHNA is that it ensures that homeownership isn’t reserved for the privileged few, but is accessible across all income levels. It supports stable, long-term housing and wealth-building opportunities for all Oregonians, including through shared-equity models, resident-owned cooperatives, and community land trusts. The law also requires local governments to report on barriers to homeownership for communities of color, because we can’t address what we don’t know. This data is absolutely essential because we can’t build diverse, resilient communities without it.

As a result of the OHNA process, the Department of Land Conservation and Development (DLCD) staff have expanded their role as a key resource by offering centralized, accessible data that goes beyond the equity indicator and housing production dashboards. They’ve also helped integrate critical elements into OHNA that address developer barriers while centering the needs of those most affected by the housing crisis. For example, the rules allow affordable housing to meet density requirements based on bedroom count rather than unit count. This approach helps keep affordable family-sized units a priority where they’re most needed and stems directly from a recommendation by an affordable housing

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<sup>4</sup>[https://secure.sos.state.or.us/oard/displayDivisionRules.action;JSESSIONID\\_OARD=k\\_aamkTx88lOQiHka7T1lRtR11S3Gv4Rp1XeMbuGvy1AmyV4qmzf!-1550591806?selectedDivision=3058](https://secure.sos.state.or.us/oard/displayDivisionRules.action;JSESSIONID_OARD=k_aamkTx88lOQiHka7T1lRtR11S3Gv4Rp1XeMbuGvy1AmyV4qmzf!-1550591806?selectedDivision=3058)

developer who faced this challenge in a recent project. We hope the availability of technical support remains central in the final rules.

We thank DLCD staff and the Commission for your continued thoughtfulness and bold leadership. We know that when housing is equitable, the health and wellbeing of all Oregonians improve. The lift is big and the

work is hard, but we're not going to solve Oregon's housing crisis by maintaining the status quo. If we want measurable change, we need a vision and the courage to stick with it. We look forward to seeing OHNA adopt rules that bring our shared vision to life.

Sincerely,

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Oregon Just Transition Alliance

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