



Oregon

Kate Brown, Governor

Department of Land Conservation and Development

635 Capitol Street, Suite 150

Salem, OR 97301-2540

(503) 373-0050

Fax (503) 378-5518

www.lcd.state.or.us



Housing Needs Analysis Update Schedule

(Required by House Bill 2003 – 2019 Legislative Session)

To: Planning and/or Community Development Directors for Oregon Cities over 10,000 population, Interested Parties

From: Jim Rue, Director

CC: Land Conservation and Development Commission

Date: December 20, 2019

Subject: Housing Needs Analysis Update Schedule Requirements

Attachment: Housing Needs Analysis Update Schedule

Dear Planning Directors, Community Development Directors, and Interested Parties,

The passage of House Bill 2003 in 2019 established a requirement for the Oregon Land Conservation and Development Commission (LCDC) to set a schedule (by December 31, 2019) for all Oregon cities with a population of more than 10,000 to adopt updated housing needs analyses (HNAs). House Bill 2003 stipulates that cities within the Portland Metro Urban Growth Boundary must update their HNAs every six years, all other cities must update their HNAs every eight years. The requirement for regular HNA updates is a new and ongoing obligation for these local governments (and for those that grow to be over 10,000 population in the future). At their September meeting, LCDC delegated authority for schedule setting to the Director of the Department of Land Conservation and Development (DLCD).

In mid-November of 2019, DLCD staff emailed planning officials from all cities with a population above 10,000, soliciting input regarding the status of their current HNAs, along with any planned update actions or other housing-related work. We appreciate local government staff who were able to respond to that inquiry. Taking that guidance into consideration, staff prepared a draft schedule, considering also the following elements; 1) the age of each city's adopted and acknowledged HNA, 2) population growth rates, 3) the level of rent burden in each city (high rent costs in relation to median household income), and 4) DLCD's capacity for timely review of HNAs on an annual basis.

DLCD staff distributed a draft schedule for review and comment on December 6, 2019. Comments were accepted through December 16, 2019.

The requirement for HNA updates will be a new and ongoing obligation for local governments. House Bill 2003 provides funding supporting HNA updates for the affected cities within the current biennium, ending on June 30, 2021. In January 2020, the department expects to open the application process for cities to apply to receive this assistance. We will be in touch with you again at that time.

In addition to the attached HNA Update Schedule, please review the associated notes if you are interested. Those notes explain the applicable deadlines and other important elements of the department's administration of the HNA update program.

Please address any questions regarding the operation of the HNA schedule to DLCD Senior Urban Planner Kevin Young. Kevin can be reached at (503) 934-0030, or via email, at kevin.young@state.or.us.

Thank you for your input to date and for your continued work on behalf of Oregon's communities.

Housing Needs Analysis Update Schedule for Oregon Cities with a population above 10,000 (Required by House Bill 2003 – 2019 Legislative Session)

Cities to adopt updated housing needs analyses by December 31st of the listed year. (See notes on back regarding other program details)

	2022	2023	2024	2025	2026	2027
1	Beaverton	Ashland	Bend	Forest Grove	Eugene	Central Point
2	Grants Pass	Hillsboro	Hermiston	Springfield		Corvallis
3	Happy Valley	Lake Oswego	Sandy	The Dalles		Cottage Grove
4	Milwaukie	McMinnville	Gresham			Prineville
5	Newport	Portland				Roseburg
6	West Linn	Tigard				St. Helens
7		Wilsonville				
8		Medford				

Cities Expected to adopt HNAs prior to 2022, resetting HNA update deadlines*

	2022	2023	2024	2025	2026	2027
1	Albany*		Keizer*			
2	Canby*		Salem*			
3	Coos Bay*		Newberg*			
4	Cornelius*					
5	Dallas*					
6	Gladstone*					
7	Klamath Falls*					
8	La Grande*					
9	Lebanon*					
10	Ontario*					
11	Oregon City*					
12	Pendleton*					
13	Redmond*					
14	Sherwood*					
15	Silverton*					
16	Troutdale*					
17	Tualatin*					
18	Woodburn*					

*The listed cities are anticipated to adopt HNAs prior to the listed deadlines, thereby “resetting” their applicable deadline six years into the future for cities within Portland Metro, eight years for cities outside Portland Metro. If cities do not adopt updated HNAs prior to the listed deadlines, the listed deadlines will apply.

HNA Update Notes on Administration:

1. The deadline for adoption in any given year will be December 31st.
2. A city will be considered to have met its obligation to adopt the HNA update once the update decision is final at the local level. Any subsequent appeal will not be considered a failure to comply with the update requirement.
3. The date of final adoption of the HNA at the local level will establish the next HNA update deadline. The next update deadline will be six or eight years in the future, depending on whether or not the subject city is in the boundary of Metro (Portland Metropolitan Area). (Six years if in Metro, eight if outside Metro)
4. Those cities that adopt an HNA prior to their listed deadline will effectively “reset the clock,” such that their next applicable HNA deadline will run six or eight years from the actual adoption date, depending upon whether or not they are within the boundary of Metro. Note that the draft schedule includes a large number of cities that are scheduled for updates in 2022, but which are anticipated to adopt HNAs prior to that date, which will effectively reset their respective deadlines.
5. House Bill 2003 stipulates that the first scheduled HNA update may be no less than two years following adoption of administrative rules for another element of the bill, known as “housing production strategies.” The department anticipates that the Land Conservation and Development Commission will complete rulemaking on housing production strategies (HPSs) in the fall of 2020. However, if HPS rulemaking extends beyond December of 2020, the department will reset the schedule and add one additional year to each of the listed deadlines.
6. Please note that for the city’s HNA update deadline to have been met, a city must adopt the HNA by ordinance, typically as a supporting document to the city’s comprehensive plan. Adoption of the HNA by ordinance also allows city decision-makers to utilize the HNA as a legally defensible basis for decision-making.
7. Also, please note that, consistent with OAR Section 660-024-0050(4) a city must address a land deficit identified in the HNA prior to, or concurrent with, adoption of the HNA. The local government must amend the plan to satisfy the need deficiency, either by increasing the development capacity of land already inside the city, by expanding the UGB, or both.