



November 8, 2023

Dept. of Land Conservation and Development  
Housing Division  
635 Capitol Street NE, Suite 150  
Salem, OR 97301

**Re: City of Beaverton Housing Production Strategy (HPS)**

This letter is submitted jointly by Housing Land Advocates (HLA) and the Fair Housing Council of Oregon (FHCO). Both HLA and FHCO are non-profit organizations that advocate for land use policies and practices that ensure an adequate and appropriate supply of affordable housing for all Oregonians. FHCO's interests relate to a jurisdiction's obligation to affirmatively further fair housing. Please include these comments in the record for the City of Beaverton Housing Production Strategy.

HLA and FHCO commend the staff of the City of Beaverton for their diligent work in analyzing the housing needs for current and future residents. The HPS does a particularly exceptional job at contextualizing the housing needs of underserved populations, as well as identifying specific strategies to meet these needs. However, we have some concerns that the strategies will not adequately meet the demand for affordable units in appropriate locations.

We emphatically support the City's equity-focused housing strategies, including making planning processes more inclusive, reducing barriers to multigenerational housing, and raising standards for accessible design and construction. We also support the City's intention to broaden shelter options and stabilize housing for those vulnerable to becoming homeless. These policies on their own, however, will not result in fair and equitable housing outcomes. The HPS lists efforts to increase density and housing mix in existing multi-residential and multi-use zones, as well as recent UGB additions. A policy of "holistic planning to distribute new density more equitably" is listed as a long-term strategy, ensuring that new housing opportunity in the short term will continue to be concentrated in areas which may lack economic opportunity.

We are also concerned about the City's stated intention to shift new housing production towards owner-occupied units over rental units (53% v. 47%). We understand that these numbers are based on a goal of achieving greater equity in homeownership, and this is certainly a worthwhile effort, however it seems unrealistic and counterproductive when looking at the existing need when 32% of new households are expected to be low income. Stable and affordable rental housing at adequate levels should be seen as a prerequisite for meeting the City's homeownership goals.



Please provide written notice of your decision to, FHCO, c/o Samuel Goldberg, at 1221 SW Yamhill Street, #305, Portland, OR 97205 and HLA, c/o Jennifer Bragar, at 121 SW Morrison Street, Suite 1850, Portland, OR 97204. Please feel free to email Samuel Goldberg at [sgoldberg@fhco.org](mailto:sgoldberg@fhco.org) or reach him by phone at (503) 223-8197 ext. 104.

Thank you for your consideration.

A handwritten signature in black ink, appearing to read "Samuel Goldberg".

Samuel Goldberg  
Education & Outreach Specialist  
Fair Housing Council of Oregon

A handwritten signature in black ink, appearing to read "Jean Dahlquist".

Jean Dahlquist  
Board Member  
Housing Land Advocates