

Housing Production Strategy

Review and Advocacy



Housing Land
— Advocates —



September 2025



*A special thank you to all volunteers and
PAPA project staff members, past and present.*

June Bradley

Jennifer Bragar

Jean Dahlquist

Dagny Daniel

Samuel Goldberg

Joshua Hall

Mathew Hogan

Reed Johnson

John Miller

Jordan Rasmussen

Ed Sullivan



Introduction

The housing crisis within Oregon's cities has reached a tipping point where the portion of individual income dedicated to rent or housing payments continues to grow. For example, over 50% of Monmouth residents pay more than 30% of their income towards housing (Monmouth HPS, 2023). In the relatively high-income city of Beaverton, 46 out of every 100 renters are rent burdened, and 21% of renter households spend more than 50% of their income on housing (Beaverton HPS, 2023). This difference between income and the cost of housing is not only made apparent by record numbers of homelessness, but by continued racial and economic segregation within cities. As another example, within Beaverton certain census tracts have BIPOC concentrations of 0-10%, while others soar to 60-70% (Beaverton HPS, 2023). Lower incomes have long been a proxy for racial segregation.

Before and amid this growing crisis, Oregon's land use system has attempted to respond.

One such example is House Bill 2003 (HB 2003), mandating that cities with populations over 10,000 persons must prepare and implement

a Housing Production Strategy (HPS). In response, advocate groups Housing Land Advocates (HLA) and the Fair Housing Council of Oregon (FHCO), have teamed up to review and comment on as many of these HPSs as possible. This HLA/FHCO partnership has oftentimes been the only organization to review the draft HPS and submit comments to the Department of Land Conservation and Development (DLCD).

The intention of HLA's and FHCO's partnership is to ascertain the effectiveness of the HPS program as a whole, and provide recommendations about how to address shortcomings. Within this report we will discuss:

1. What is an HPS and why it is important
2. What is the PAPA project?
3. Common Techniques and Trends Observed with reviewed HPSs
4. Typical Conditions of Approval or Remand Rationale of HPS provided by DLCD
5. Conclusion and Suggestions for Improvement
6. Appendix; notes on each HPS reviewed in chronological order

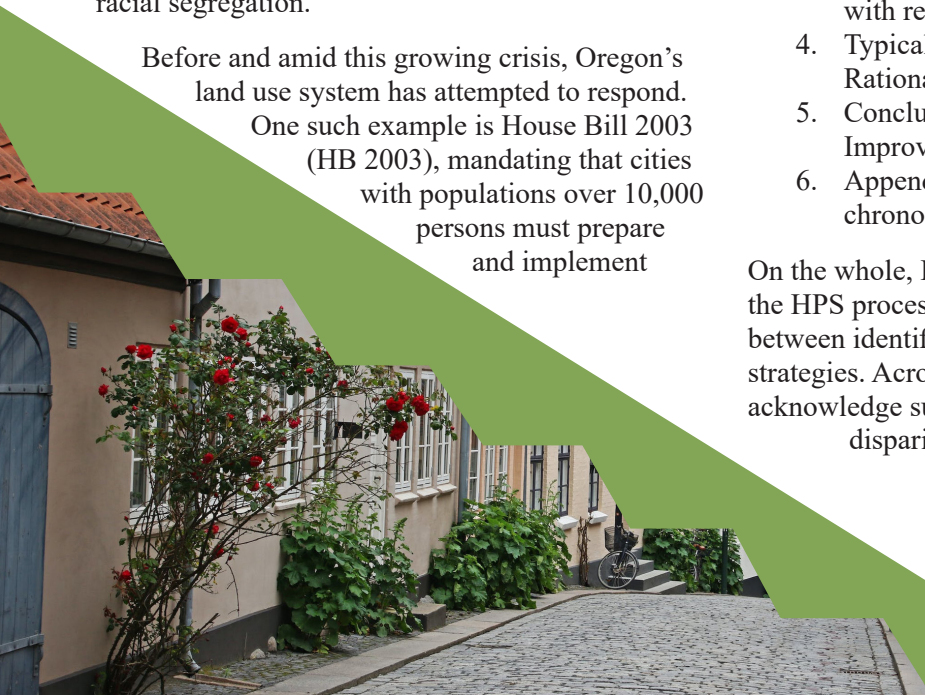
On the whole, HLA and FHCO are disappointed in the HPS process and the significant misalignment between identified housing needs and proposed strategies. Across the HPSs, cities consistently acknowledge substantial unmet housing needs, disparities, and burdens on low-income residents. Yet, most propose

strategies—such as easing or encouraging the development of Accessory Dwelling Units—that are unlikely to meaningfully expand housing choice or security for the most vulnerable residents. In some cases, the proposed actions would even deepen existing inequities.

For example, the West Linn HPS proposes to increase affordability by upzoning desirable waterfront property to high-density residential use and creating tax breaks for homes valued at nearly \$1 million (West Linn HPS, 2025). Positioning luxury and market-rate development as solutions to affordability undermines the intent of HB 2003, which was enacted to ensure necessary housing production and promote fair and equitable housing outcomes.

The HPS process and the passage of HB 2003 represents a once in a generation opportunity for Oregon cities to take stock of their increasingly cost burdened residents, and create inclusive, accessible, and thriving communities. It is the hope of both HLA and FHCO that by bringing these findings to light, Oregon's residents, activists, politicians, and planners, can come together in partnership to ensure that we use this process to ensure all Oregonians have a place to call home.

In the relatively high-income city of Beaverton, 46 out of every 100 renters are rent burdened, and 21% of renter households spend more than 50% of their income on housing (Beaverton HPS, 2023).



What is a HPS and why is it Important?



Oregon's land use system consists of legislation, administrative rules, and 19 Statewide Planning Goals that express the state's policies on land use development. These goals are utilized by cities, counties, and Metro to inform their land use and policy decisions, and these entities must describe how most discretionary decisions meet each relevant Statewide Planning Goal. If certain land use decisions do not meet the relevant goals, they are appealable by persons with standing (i.e., who appeared orally or in writing at a hearing).

Statewide Planning Goal 10 and state law require cities to develop a housing needs analysis (HNA) to determine if the city has adequate land to meet its housing needs in terms of both unit count and affordability level. Amid a growing affordability

crisis, House Bill 2003 (HB 2003) expanded on this requirement, by mandating that, in addition to the HNA, cities with populations over 10,000 persons must prepare and implement a housing production strategy (HPS). Cities must provide within their adopted HPS actions and measures that will support meeting their stated housing needs. Additionally, they must supply a schedule for implementation of those actions and measures. 23 cities have completed their HPS since May 2023, including Ashland, Gresham, Portland, and Happy Valley.

As housing advocates for equitable and affordable housing, HLA and FHCO review, comment upon, and summarize their findings on as many HPSs as possible, as a function of the ongoing PAPA project (see below section). Findings are presented to

stakeholders each quarter, including the DLCD for analysis and action. Feedback from HLA and FHCO reviews are already being utilized for correction, and to shape requirements and suggestions for future HPSs. Since 2023, HLA has reviewed and commented on 12 of the 23 published HPSs. Of the 23 published HPSs as of the date of this report, DLCD has reviewed and Approved, Approved with Conditions, or Remanded 19 HPSs. A list of HPS reviewed and notes on each is included in this report's Appendix. HLA welcomes all concerned residents of Oregon to participate in this important work.

To participate in reviews/comments, please email: jdahlqu1@gmail.com



Housing Land — Advocates —

*The partnership between
HLA and FHCO is one of the
only non-profits partnerships
explicitly dedicated to
housing law enforcement in
oregon.*

#watchdog



What is the PAPA project?



Beginning in 2015, HLA partnered with the FHCO to review all post acknowledgement plan amendments (PAPAs) submitted to the DLCD to examine their fair housing/Statewide Planning Goal 10 implications. These PAPAs include changes to local comprehensive plans, land use regulations, and zoning map changes. During that review, jurisdictions receive feedback on their Goal 10 findings with emphasis on utilization of their HNA, Buildable Lands Inventory (BLI), and compliance with state law. This review ensures that jurisdictions consider and further their obligation to provide an adequate number of needed housing units (by both the needed housing type and affordability level), and that these housing units will be supported by the residential land supply following enactment of the proposed change.

Feedback may come in the form of technical assistance, negative or positive comment letters, and potential legal action depending on the individual circumstances of each case. Depending on the type of amendment, feedback can also involve development code review, policy review, and planner education around topics such as clear and objective standards and the federal Fair Housing Act. Due to the broad scope of this review process, this project also informs FHCO and HLA with respect to housing code amendment trends, jurisdiction responses to mandated changes such as HB 2001/2003, and other housing matters.



Common Techniques and Trends Observed within reviewed HPSs



There have been a few clear winners in the HPS process. In general, HLA has noticed an increase in zoning and code changes to allow Single Room Occupancies (Ex: Monmouth, Happy Valley), less parking requirements for new developments (Ex: Hillsboro, The Dalles), and encouragement of middle housing options through permit ready plans and System Development Charge (SDC) waivers/scaling (Ex: Beaverton, Independence). Additionally, with a lack of direct funding sources, cities are turning towards multi-unit limited tax exemption programs (MULTEs) of 10 years, to provide financial incentive to build housing at 80% Area Median Income or below (Ex: Milwaukie,

Beaverton, West Linn).

The wins above are undermined by clear deficiencies across nearly all HPSs reviewed, including:

1. Dire needs articulated but proposed actions did not fully take into account stated needs
2. Seniors and residents with disabilities were completely left out of the analysis at worst, lumped in at best with middle housing options
3. Complete lack of commitment in any reviewed HPS to upzone single family zoned land
4. Good policies and ideas present undermined by lack of commitment and long, ambiguous timelines for implementation.

Each of these observations is elaborated on below.

Dire needs articulated but proposed actions did not fully take into account stated needs

Few HPS were optimistic regarding the state of housing within their jurisdictions, especially for renter populations. The McMinnville HPS states “Over half of renter households in McMinnville experience cost burden (56%), compared with 27% of owner households.” Milwaukie’s HPS reports that 35% of its households are cost burdened, and that figure is even more staggering – at 52%-- when considering rental households alone.

Additionally, when the HPS chose to geographically map their housing needs, racial and economic segregation was often observed. Paralleling the

Beaverton example noted above, The Dalles also noted that low-income residents were clustered within certain census tracts. The Dalles HPS compared this economic segregation to a zoning map, and discovered that these lower income census tracts were zoned high density.

Therefore, HLA and FHCO were disappointed that the statement of housing needs rarely appears to have any meaningful connection to the final strategy recommendations. As one HPS review volunteer observed, “it’s like the cities already knew what they wanted to do, and just stated need because they had to.” For example, the West Linn HPS acknowledges a low supply of land for multi-family development, resulting in a lack of affordable housing options. Yet, in its strategy entitled “Rezone Land,” the city only states that “It could also involve rezoning lower-density areas to allow higher-density housing.” By failing to translate the clearly identified need for more multi-family housing into a concrete zoning commitment, the strategy fails to address the very problem it recognizes.

Similarly, The Dalles HPS was commendable in its discovery that many of its low income households were clustered in high density census tracts. Yet, no strategies were mentioned to create affordable housing opportunities in other geographical locations.

When one HPS expresses a need for more multi-family zoned land, and does not commit to rezoning to accomplish the need, it is an oversight. When one HPS addresses the need for more rental housing exclusively through upzoning middle density zones to high density, the most expensive type of rental housing, this is notable. When **EVERY** HPS reviewed has not committed to a single parcel of single family land being upzoned to multifamily land it is a glaring omission.

Seniors and residents with disabilities were completely left out of the analysis at worst, or lumped in at best with middle housing options

OAR 660-008-0050(4)(b) requires each city to analyze how the proposed HPS affirmatively furthers fair housing for all state and federally protected classes. State protected classes consist of

- Race
- Color
- National Origin
- Religion
- Disability
- Sex (includes pregnancy)
- Sexual Orientation
- Gender Identity
- Age
- Marital Status

While less than ideal, most HPS attempt to address disparate needs among residents of color. As an example, the Independence HPS states that it will serve residents of color through zoning incentives for affordable housing units, an urban renewal area, and allow cottage cluster housing in all residential zones, among other strategies. However, with few exceptions, this cursory attempt is not made for seniors and residents with disabilities.

While The Dalles HPS states that 19% of its population identifies as disabled, and 20% of the population consists of seniors, only one of its proposed strategies directly addresses residents with disabilities. This strategy “Implement zoning incentives for affordable and accessible housing” (Action 2.3) sounds promising, until you read the text of “The City will adopt zoning incentive(s) for housing developments that include income-restricted affordable units **OR** units that are accessible to people with disabilities.” (emphasis added). Further, the demographic of “People with Disabilities” and “Seniors” is then tacked on to any increase in housing choice with little forethought

or explanation, such as Action 2.5 “Provide more flexibility for housing in commercial zones” and “Allow triplexes, fourplexes, and cottage cluster housing in the RL Zone.” Without direct action such as accessibility mandates, or precise targeting such as programs designed to help seniors construct ADUs, this automatic assumption that housing choice means an increase in opportunity for seniors and residents with disabilities is not based on any evidentiary support.

The clearest example observed of this disappointing trend is provided by the West Linn HPS. The HPS states that the document will help achieve fair and equitable housing outcomes for people with disabilities—and yet only Actions 3 and 4 tie their benefits to the disabled community, and that connection is tenuous. Action 3 states that SDC reductions or deferral will “directly” benefit people with disabilities by increasing housing options, but does not provide specific and actionable steps to incentivize or mandate those accessible housing options. Similarly, Action 4 states that the MUPT program could be targeted to benefit people with disabilities but provides no details as to how the program would do so and what that targeting might look like in practice.

Good examples of meeting the needs of seniors and residents with disabilities can be found in both the Happy Valley HPS and Sweet Home HPS. The Sweet Home HPS will encourage the incorporation of universal design principles into new construction and remodels by education and providing prototypes to developers. The Happy Valley HPS takes this one step further, and states that “The City will provide incentives in the Development Code to increase units designed for Universal Design and Lifelong Housing Certification, expanding mobility-friendly housing requirements beyond Frog Pond East and South.”

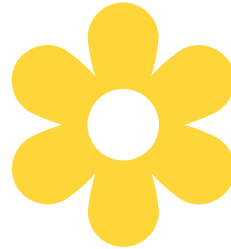


Complete lack of commitment in any reviewed HPS to upzone single family zoned land

When one HPS expresses a need for more multi-family zoned land, and does not commit to rezoning to accomplish the need, it is an oversight. When one HPS addresses the need for more rental housing exclusively through upzoning middle density zones to high density, the most expensive type of rental housing, this is notable. When EVERY HPS reviewed has not committed to a single parcel of single family land being upzoned to multifamily land it is a glaring omission. The orderly process of urban development assumes a gradual increase in density, from large lot single family homes, to middle housing and 4 story wood walkups, to eventually the high density of an urban core or city center. For whatever reason, this is no longer a technique that is being employed to add housing capacity in Oregon.

In a presentation to Housing Oregon in 2024, entitled Segregation Alive and Well in Oregon, HLA and FHCO reported on HPS trend analysis up until that point. The largest identified defect was the lack of upzoning of single family land, with the alternatives observed as upzoning of middle density land to high density land, and traversing a path toward overly broad (or unnecessary) Urban Growth Boundary expansions. Both of these techniques lead to economic and racial segregation through the destruction of naturally occurring affordable housing choices in medium density zones in favor of high cost new construction, and the building of affordable choices exclusively within UGB expansion lands, far away from city center services. One year later there has been no observed improvement.

If the HPS program is to prove successful, it must result in the eventual upzoning of some single family zones to multifamily zoned land.



Good policies and ideas are undermined by lack of commitment and long, ambiguous timelines

As policy recommendation documents, the HPSs generally provide a menu of innovative and practical solutions. One particularly innovative solution was provided by the City of McMinnville around land annexations. This is the only HPS reviewed that contains this proposed solution.

“When property owners are seeking annexation into the City of McMinnville, there COULD BE requirements in place that require the annexed land to be developed with a mix of housing types and a mix of lot sizes to promote diverse housing opportunities...” McMinnville HPS (Emphasis added).

But, this is really a missed opportunity because the city does not actually commit to the innovative ideas. Below, McMinnville showcases an ability to be firm, while simultaneously not committing, to a well-researched and proposed strategy.



“The city WILL develop clear and objective standards for implementing the Great Neighborhood Principles. The City CAN ALSO establish guidance on the implementation of the Great Neighborhood Principles that will inform the land uses for the Urban Reserve and Urban Growth Boundary areas....” McMinnville HPS (Emphasis added).

In addition to lack of commitment, those actions that the city does commit to, are often slated to go into effect or worse, be evaluated, 2-4 years post adoption of the HPS. If the potential for zoning changes is not evaluated until 2 years post adoption, it is reasonable to expect that implementation could be as far out as 4-6 years.

As will be seen within the next section, this is one area where HLA has observed some action from DLCD in the form of both approval conditions and remands.

Typical Conditions of Approval or Remand of HPSs by the DLCD



Early examples of DLCD review of HPSs included 2 repeated conditions of approval, including a comment on timeline specificity and monitoring of implementation. See below examples from DLCD's approval with conditions of the Monmouth HPS:

“Condition of Approval #1: To ensure the feasibility of implementing the strategies within the required eight-year period, it is crucial to develop a more precise timeline beyond the “near”, “short”, “medium” or “long-term” categories. This is critical to aid in timely implementation locally but also to ensure that DLCD can monitor the city's progress in implementation as described in OAR 660-008-0070...”

Condition of Approval #2: DLCD is particularly interested in how the City will monitor the implementation of the proposed strategies on an annual basis. DLCD requests that, at the time the city submits its four-year, mid-cycle Housing Production Strategy report to the department under OAR 660-008-0060, the city provides all annual monitoring summaries to the department. These annual summaries are not required as part of the submittal under OAR 660-008-0060 and therefore will not be used to make any final approval decisions. Rather, DLCD is interested in these summaries for informational and educational purposes.”

At times, we have observed DLCD to become increasingly involved and committed to change. Occasionally, DLCD has required cities to adopt suggested strategies if there were no committed strategies targeted towards a specific population.

As a condition of approval, DLCD required Happy Valley to adopt suggested development code changes.

“Condition of Approval 2: Action C.1 “Reduce limitations to multi-family housing” lists five “recommended changes” to the development code. The CHN notes a significant lack of rental opportunities within the city, and it identifies that the majority of renters live in multi-unit buildings. In order to address this need, the city will adopt all of the recommended changes in order to show that the action has been completed.”

Additionally, DLCD has remanded two of the reviewed HPS documents, Hillsboro and Molalla. The remands involved a lack of clear timelines, clear commitments, inclusion of Urban Growth Boundary expansions as a strategy, and alignment with current housing needs. Especially encouraging is the emphasis on the “benefits and burdens rule.” The example below is from the DLCD remand of the Hillsboro HPS.

“OAR 660-008-0050(3)(d)(C) requires an analysis of the income and demographic populations that are anticipated to receive benefit or burden for each action, including:

- (i.) Low-income communities;
- (ii.) Communities of color;
- (iii.) People with disabilities; and
- (iv.) Other state and federal protected classes...

The intent behind the benefits and burdens analysis rule requirement is to ensure that actions generate benefits—and, more importantly, that jurisdictions

commit to mitigation actions for any identified burdens associated with each action...”

HLA and FHCO applaud DLCD in making these needed remands and is cautiously optimistic. What remains to be seen are the changes the revised documents contain, and the actions taken if cities undermine the actions required of them by their HPS.



Conclusions and Suggestions for Improvement

The housing situation in Oregon has never been more dire. This admission is not just contained within each HPS, detailing high numbers of cost burdened residents, but within popular media. In January 2025, the Willamette Week summarized the findings of the recent Oregon Housing Needs Analysis:

“Much of Oregon, not just Portland, is experiencing a housing affordability crisis. ECONorthwest’s data shows that half of all renters in Portland are “rent-burdened,” meaning they spend more than 30% of their gross income on rent. That’s tough, but the numbers are even higher for Salem (54%), Medford (55%), Eugene (56%) and Gresham (61%)...

The reason for the affordability crisis: Oregon continues to experience a major housing shortage, having failed to keep up with population growth for more than a decade, ECONorthwest economist Mike Wilkerson told senators. Only one state, Connecticut, has fewer homes per household than Oregon.”

-- “Oregon has the Nation’s Second-Tightest Housing Market” The Willamette Week, January 29, 2025

We should not forget that these numbers have real world impacts, and are far more than just statistics printed on a page. Health Care for the Homeless states that individuals without stable housing are 3-4 times more likely to die prematurely ([Homelessness](#)



[Makes You Sick](#), Health Care for the Homeless, <https://www.hchmd.org/homelessness-makes-you-sick>). Additionally, research shows that the shortage of affordable housing costs the American economy about \$2 trillion a year in lower wages and productivity ([The Problem](#), National Low Income Housing Coalition, <https://nlihc.org/explore-issues/why-we-care/problem>).

In contrast the shadow cast by a multi-family development or not finding a convenient parking spot, do not have the same kinds of nationwide and personal impacts.

Through both the media and public’s experience, there is a growing awareness of the housing crisis, its affects, and a mass consensus that something should be done to ameliorate the situation. There is public support for change, and now is the time to use the approved framework of the HPSs to drive meaningful and timely action.

To address this crisis within the HPS framework, HLA and FHCO has the following suggestions:

- 1) As well as a demographic and economic analysis of needs, a geographical component must be included. If segregation is observed in portions of urban areas, it must be called out.
- 2) The HPS must respond with an actionable and timely strategy solution to each unique need as described in the analysis. For an

example, if the HPS states that it needs more affordable rental options, then there should be a solution such as rezoning land to medium density multifamily in proportion to the need that will be achieved in 1-2 years. Solutions must be targeted towards specific demographic groups and the HPS must explain how the strategy serves each demographic group. Demographic groups MAY NOT be lumped together in the assumption that increased housing choice will benefit all groups equally. This is in line with the benefits and burdens rule as articulated by DLCD.

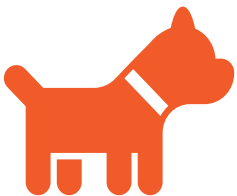
- 3) Based on the city’s housing needs and rental burden, a proportionate amount of land must be upzoned from single family to either multi-family or high density. This must be required or as we have seen, an overwhelming majority of cities will fail to serve their cost-burdened residents in order to protect single family zones.
- 4) If post HPS adoption, the city adopts rules and/or regulations that counteracts enacted HPS strategies, DLCD must consider this during the mid cycle Housing Production Strategy Report.
- 5) DLCD must be cognizant that cities not be allowed to take pre-HPS adoption strategies that undermine the ability to affirmatively further fair housing in the ultimate HPS.

Summary

While the HPS process exhibits many positive trends, through selective placement and a lack of targeting, they encourage both segregation between economic classes and push upper tier homeownership under the false banner of equity to the exclusion of renters and lower income families seeking homeownership.

We Must DO BETTER.

HLA and FHCO continue the fight for true equity in housing and housing opportunity.



Help us continue the fight.

Participate.

Donate.

Educate.

housinglandadv.org & fhco.org



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Appendix

Milwaukie – September 2023 (Approved with 1 condition related to monitoring progress)

- Dire needs
- No committed language
- Strategies not related to needs. None at lower income side of spectrum.
- Drawn out timeline
 - o Of the two strategies that purport to help households at 60% MFI and below is simply meant to “evaluate” incentives for affordable housing. This has a two-year maturation, which means that any tangible results are inevitably further out than that.
- Multi-unit limited tax exemption program (10 years, not scheduled for evaluation until 2027). Up to 80% AMI.
- Lack of rezoning
 - o Beyond the enumerated strategies, though, there are some easily identified problems. Two are immediately noticeable in the identified barriers to housing needs of the city. First, the HPS laments the lack of developable residential land, “especially in high-density residential zones.” Second, the HPS identifies a lack of land for development of regulated affordable housing. Highlighted issues in the second of these are ready access to services such as transit and social services. Despite these two identified problems, *none* of the strategies proposed in the HPS would rezone parts of the city to multi-use.

Monmouth – September 2023 (Approved with 2 conditions. 1 more precise timeline. 2 monitoring)

- Dire Needs
- Does say to upzone “**low OR medium density**” residential to high-density residential
- Had UGB expansion/swaps as part of a strategy
- Reduced parking for affordable housing
- SROs given student population
- Low priority on crucial items

Beaverton- November 2023 (Approved with conditions, 1 speed up strategy 2.6, 2 monitoring.)

- Dire Needs
- Construction Excise tax
- Middle housing/mixed housing types for upper middle class
- Multi-unit limited tax exemption program (MULTE, 10 years) 60% AMI and above
- More equally disperse high density housing throughout the city (DLCD says Strategy 2.6 should be promptly implemented)
- Not much targeted towards low income

- Really good census tract mapping which led to the below feedback but was really good mapping
- DLCD comments noted segregation of census tracts
 - o “The subsection does not address patterns of integration and segregation. Figure 5.5 in the City’s Housing Needs Analysis report illustrates patterns of segregation with a wide range of concentration of BIPOC folk across the City’s census tracts, as low as 0-10% of the population and as high as 60-70% of the population. Such a range of concentration of BIPOC residents across census tracts suggests patterns of integration and segregation” “DLCD finds that the City has largely satisfied the requirements of OAR 660-008-0050(4)(b), however particularly given the evidence of racial segregation across the City’s census tracts, the Department expects the City to include housing production strategies in future HPS reports and in the process of its current Goal 10 activities that work to address patterns of segregation and integration and foster inclusive communities free from barriers that restrict access to opportunity based on protected class within the City.”
- DLCD pushes for strategies to be linked to communities of color (January 18th, 2024)
- No upzoning of anything

Hillsboro HPS – January 2025 (REMANDED, 2 conditions. Shall not include pursue UGB expansion and shall clarify the actions and sub-actions included (specificity, timelines, and alignment with current housing needs”)

- SDC rework scalable to certain housing types
- Upzoning of medium density residential not low
- UGB included as strategy piece

Independence – March 2025 (Approved with 3 conditions. 1) Timeline, 2) Report on responsible entities. 3 monitoring.)

- Slow roll out of policies (3 years or later)
- Promotes ADUs
- Has upzoning to high density residential zones but uncommitted in which zones and how much of each. Though it is fairly fast.

The Dalles – March 2025 (Approved with 4 conditions, timeline, complete CET study by midpoint, identify responsible entities by midpoint, monitoring summaries by midpoint)

- Great mapping showing economic segregation, but little was done with the information
- Lower income homeownership opportunities
- Middle housing mentioned but no upzoning of single family

Sweet Home – March 2025 (approved with two conditions, timeline and midpoint reporting)

- Great Affirmatively Furthering Fair Housing Commitment. Measure C.1 amends the City’s Comprehensive Plan which will ensure that fair housing outcomes are considered in land use applications that involve housing for lower income households. HLA recommended all households, to include for example disabled households who are not low income.
- Some measures to educated developers on accessibility
- NO upzoning
- They did do mapping showing racial and economic segregation and concentration

Happy Valley – April 2025 (Approved with 6 conditions, timeline, city will adopt all recommended changes in action C.1 “Reduce limitations to multi-family

housing”, universal design study WILL be completed and the city WILL adopt the recommendations”, will collaborate to address potential burdens, prioritize affordable housing toolkit in first half of cycle, monitoring summaries at half point)

- Affordable housing toolkit but developed in 3 years
- States that expanding cottage cluster housing options could be useful but the city was actively fighting the HLA/FHCO lawsuit at the very same time
- They did map by median household income
- Allowance for SRO's
- No upzoning of single family
- No solid tactics

“a cottage cluster overlay–adopted in 2024–prohibits cottage cluster housing in one area of the city, while expanding allowances elsewhere. Loosening these restrictions on where they can be sited is one way to encourage infill.” HPS at 57.

- The City is currently resisting changing these restrictions in the above-referenced *HLA v. City of Happy Valley* case. While the HPS states that the City wants to make these changes, its actions clearly show that its intention is to *not* allow this type of housing. But, recent legislative changes resulted in a win for HLA so that the city will be required to examine cottage cluster housing across all single-family residential areas. For more information and to read the full brief, see the HLA website.

Molalla – May 2025 (REMANDED, benefits and burdens rule, identify and commit to measures that meet its accessible housing need, multi-unit housing need, action plan for zombie housing)

- Regulating short term rentals, and SDC changes
- Didn't map
- No upzoning
- Changing zoning code to allow for ADU and cottage cluster development
- Over reliance on the LIHTC

West Linn –July 2025 (Not available yet)

- Lack of commitment
- Timelines
- No locational analysis
- Failure to address significant needs in HCA and HNA

Wilsonville – August 2025 (Not available yet)

- Lack of clear commitments
- “Evaluate redesignating or rezoning land for housing” select vacant OR low density land

McMinnville – August 2025 (Not available yet)

- Lack of accountability
- Clear permitting process
- Incentives for universal design (but what are they???)
- Didn't do mapping