



January 20, 2026

BY EMAIL (housing.dlcd@dlcd.oregon.gov)

DLCD, Housing Division
635 Capitol Street NE, Suite 150
Salem, OR 97301

Re: City of Hillsboro Housing Production Strategy (HPS)

Dear Housing Division Staff,

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 Hillsboro Housing Production Strategy.

In December of 2024, almost a year ago, HLA and FHCO commented on the previously remanded Hillsboro HPS. While the HPS set forth an ambitious set of actions to meet the needs of its residents, it fell short in accountability to both a timeline and the public review process. Additionally, the use of UGB expansions within the HPS was not in accordance with ORS 197.290, a point also raised by the Department of Land Conservation and Development (DLCD). These shortcomings proved to be factor in the previous remand.

However, the resources invested in the new HPS draft appears well spent. Hillsboro's attention to detail within its demographic analysis is unmatched in any previous HPS reviewed by both HLA and FHCO. This attention to detail and careful review of the facts, formed the data baseline to create strategies that have a well-based concrete timeline, Affirmatively Further Fair Housing, and commit to anti segregationist acts of rezoning while minimizing gentrification risk for the most vulnerable. Finally, many of these strategies exhibited concrete methods of impact measurement which should be an example to all other HPSs going forward. The results of this process should make both the Mayor and Council Members proud of their planning process, as well as showcase to DLCD that a remand can be positive and impactful process for all involved.

HLA/FHCO commend the detailed geospatial analysis, and commitment to utilizing that data to fully describe the needs of Hillsboro's diverse population. This analysis allowed the HPS to identify issues of segregation and lack of opportunity head on, the first step in developing effective strategies (see below).

"In other words, these areas could become or may already be exclusive, meaning they may block other residents from accessing key amenities (e.g. schools) and opportunities (e.g. employment) there through high prices and resistance to change. This is another housing

issue where action could be necessary to ensure more households have the choice to access such attractive areas and opportunities." HPS, p. 22.

Once the disproportionate access to housing choice was identified by the geospatial analysis, the data further shaped strategy selection and implication. "Action 1.1: Adopt Comprehensive Plan Map amendments and Zoning Map updates to expand multi-dwelling housing capacity" was both created due to and relies almost exclusively on the geospatial analysis for its implementation. The geospatial analysis will be used to focus on areas of high opportunity (defined as access to schools, public transportation, parks, and that may include higher income households) to expand multi-unit need, while also mapping out areas of vulnerability to combat gentrification.

Additionally, this is one of the first HPS's HLA and FHCO observed with data able to showcase how missing middle housing is providing homeownership opportunities to minorities.

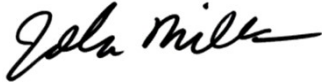
"However, the prevalence of middle housing in Hillsboro—particularly townhomes, which are often ownership housing too—assists other groups in accessing homeownership. 23% of Latino households, 20% of Asian households, and 29% of multiracial households live in middle housing, despite that housing type representing only 18% of housing stock. About 40% of that middle housing is ownership housing." HPS, p. 12.

In doing so, this provides concrete evidence that strategies such as "Action 1.4: Refine middle housing development standards," and "Action 1.8: Adopt a local pre-approved housing plan for ADUs with universal design," affirmatively further fair housing in compliance with ORS 197A.100(2).

We especially praise Hillsboro's revised HPS for utilizing data to form strategies and shape implementation, and also to quantify success. "Action 1.3: Increase housing in Commercial and Mixed-Use Zones and increase density bonus incentives for affordable, middle-income, and accessible housing units" defines impact as, "This action is estimated to increase the total zoned capacity of the mixed use and commercial zones by 600-700 units. This represents a 20-30% increase over the zoned capacity of these zones estimated in the 2023 HNA." HPS, p. 55. The only disappointment in HLA's and FHCO's review, was in fact that this rigid and data driven estimation of impact was not applied to all strategies. HLA and FHCO would like to see this type of impact measurement applied for all strategies when practical, including Action 1.1.

HLA and FHCO commend the staff and consultants involved in this project for the City of Hillsboro for a robust geospatial analysis, proposing an ambitious set of actions to meet the housing needs of its residents, affirmatively furthering fair housing, and committing to acts of desegregation so that more residents of the city may live in neighborhoods that are both diverse and thriving. The Mayor and Council Members should appreciate the work of their staff and the consultant team, and DLCD should be emboldened to hold other cities to such high standards.

Thank you for your consideration of these comments. Please provide written notice of your decision to, FHCO, c/o Shyle Ruder, at 1221 SW Yamhill Street, #305, Portland, OR 97205 and HLA, c/o Jennifer Bragar, at 121 SW Morrison Street, Suite 2 1850, Portland, OR 97204. Please feel free to email project coordinator Mathew Hogan at mathew.jamesFHCO@gmail.com.



John Miller, Executive Director
Fair Housing Council of Oregon



Jennifer Bragar, President
Housing Land Advocates

cc: (by email)
HLA Board
City of Hillsboro City Council