



February 10, 2026

**BY EMAIL ([housing.dlcd@dlcd.oregon.gov](mailto:housing.dlcd@dlcd.oregon.gov))**

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

**Re: Metro Regional Housing Coordination Strategy (RHCS)**

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 Metro Regional Housing Coordination Strategy (RHCS).

By way of reminder, HLA has spent more than a decade urging Metro to plan for affordable housing, often with FHCO's support. HLA began its advocacy by requesting data on race and ethnicity and housing planning, but were never provided the data. HLA commented in 2016, pleading with Metro to plan for affordable housing. See attached. Notwithstanding these requests, Metro has time and again expanded the urban growth boundary without requiring affordable housing planning as a prerequisite to such expansions. In 2020, over 2,000 acres were added to the boundary to Wilsonville, Hillsboro, Beaverton, and King City without an affordable housing requirement. Similarly, the pending Sherwood boundary expansion would also allow an expansion without an affordability component. With this background, HLA and FHCO identify the significant shortfall of yet another Metro planning document.

By Metro's own acknowledgement and in agreement with the assessment of HLA and FHCO, "the housing market does not abide by city or county boundaries" and therefore Metro's planning efforts are critical to the housing production of the region. RHCS, p. 5. This duty to fulfill its unique role and ensure that residents in the Portland Metro Area have access to needed housing is legally mandated by the Oregon Housing Needs Analysis (OHNA) program through the RHCS process.

HLA and FHCO are disappointed that the long-awaited Metro RHCS falls flat. Again, by its own admission, only *one* of the proposed 16 strategies in this document will have a high impact, and that strategy is the highly vaguely worded, "Consider the viability and feasibility of new funding for affordable housing development and preservation." RHCS, p. 9. Presumably this strategy would consider the possibility of renewal of Metro's construction bond. HLA and FHCO have longstanding concerns about Metro's actions to create long documents that are unread and not utilized. Once again Metro seems to fall on the same trajectory of vague planning concepts with no meaningful

again Metro seems to fall on the same trajectory of vague planning concepts with no meaningful timelines. The RHCS continues this past-practice by stating this strategy: "Begin a Metro-Urban Growth Management Function Plan." RHCS, p. 9. The suggestion that Metro only "begin" to plan means that we have no timeline for completion or commitment to whatever the plan outlines as priorities, including metrics of success. In conclusion, this RHCS is a textbook example of wasted opportunity. Metro is also jettisoning its power of the purse. Metro could be more prescriptive in its grant funding by requiring more aggressive efforts by local governments in affirmatively furthering fair housing. Tellingly, in another context, Metro declines to be prescriptive when it could be in its role providing technical assistance to jurisdictions once their HPS has been approved..

Despite the above shortfalls, several initiatives in the Metro RHCS may help move the ball forward, if only they had timelines associated with the strategy. These include "Funding and support for local housing production strategy implementation" and "Develop or support the development of a coordinated affordable housing operational stabilization strategy." RHCS, p. 8. However, these strategies do not showcase the most basic of standards that the Department of Land Conversation and Development (DLCD) have held cities to in the HPS process, such as having a defined outcome and set timeline. We are left with many questions.

How do these strategies accelerate housing production tin cities with demonstrated failed track records of building needed housing? By conditioning their funding on metrics, for example? What criteria will Metro use to distribute its funding for technical assistance for implementation of the HPS and other planning efforts. The RHCS states "Because this action is intended to support implementation of city strategies that have been approved by DLCD, grant eligibility criteria will not be overly prescriptive regarding housing types, locations, affordability, or other characteristics." There is no need to defer the commitment to stimulating production of affordable housing to the State where local expertise and knowledge could improve outcomes, particularly with the added benefit of informed input at public hearings.

HLA and FHCO recommend DLCD remand the RHCS until the document reflects clear timelines for completing actions, as well as aligning funding with affordable housing goals. Thank you for your consideration. 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



March 8, 2016

BY U.S. MAIL AND EMAIL

Metro Councilor Sam Chase  
600 NE Grand Ave.  
Portland, OR 97232-2736

Re: Opportunities and Challenges for Equitable Housing

Dear Councilor Chase:

Earlier this month, Metro hosted a useful conference on regional housing equity and published the above paper in connection with that conference. Housing Land Advocates applauds Metro on both counts. Metro brought the Mayor of Seattle who has shown inspirational and effective leadership in efforts to assure a better affordable housing supply. Both the conference and the paper were informative as to how these ends may be achieved.

However, our organization has profound concerns over Metro's own perceptions of its role in the provision for affordable housing in our region. The conference and the report appear to limit that role to providing information and encouragement, as opposed to any affirmative engagement in the promotion or development of an equitable distribution of affordable housing across the region.

We believe Metro has a significant role to play in the provision of affordable housing in the region. While cities and counties undertake local aspects of planning and land use regulation, Metro is the regional coordinator for planning and has specific obligations under Oregon law.<sup>1</sup> OAR 660-007-0050 provides:

- (1) At each periodic review of the Metro UGB, Metro shall review the findings for the UGB. They shall determine whether the buildable land within the UGB satisfies housing needs by type and density for the region's long-range population and housing projections.
- (2) Metro shall ensure that needed housing is provided for on a regional basis through coordinated comprehensive plans.

In addition, Metro has its own obligations under its Functional Plan, which provides in Metro Code 3.07.110:

The Regional Framework Plan calls for a compact urban form and a "fair-share" approach to meeting regional housing needs. It is the purpose of Title 1 to

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<sup>1</sup> In particular, Metro has obligations under Oregon's "needed housing" statutes, ORS 197.195 to .314.

accomplish these policies by requiring each city and county to maintain or increase its housing capacity except as provided in section 3.07.120.

Metro Code 3.07.120 details these obligations. Moreover, Metro Code 3.07.730 provides:

Cities and counties within the Metro region shall ensure that their comprehensive plans and implementing ordinances:

- (a) Include strategies to ensure a diverse range of housing types within their jurisdictional boundaries.
- (b) Include in their plans actions and implementation measures designed to maintain the existing supply of affordable housing as well as increase the opportunities for new dispersed affordable housing within their boundaries.
- (c) Include plan policies, actions, and implementation measures aimed at increasing opportunities for households of all income levels to live within their individual jurisdictions in affordable housing.

A recent “compliance report” (March 2016) issued by Metro asserts that all jurisdictions are in compliance with the above provisions, but provides no findings or analysis to justify such a broad conclusion. We do not believe that such findings could be written on the basis of existing plans and ordinances.

That same “compliance report” also purports to find compliance with Title 7 of Metro’s functional plan regarding housing choice. If, as it appears, this title is centered on voluntary measures, the declaration of compliance does nothing.<sup>2</sup> And the only effective requirement of Title 7, local government reporting requirements, has been “temporarily” suspended by an appointed official for the last nine years.

While we welcome Metro’s technical assistance and affordable housing recommendation functions with regard to local government plans and land use regulations, there are other equally important code provisions that have not been implemented in the recent past, namely the inventory and progress reports provisions of Metro Code 3.07.740<sup>3</sup> and the compliance provisions of Metro Code 3.07.810 to .850.

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<sup>2</sup> Indeed, Table 3.07-7 provides for voluntary housing figures for the various jurisdictions within Metro, *but for the period 2001-06*. The table has not been updated and no attempt has been made in the “compliance report” to compare actual housing production against the figures in this table.

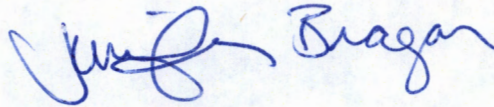
<sup>3</sup> Our organization does not accept Metro’s position, taken in its November 28, 2007 letter to cities and counties in the region that a bureaucrat may “temporarily” suspend the provisions of its ordinance requiring the housing reporting requirements of its ordinances that are adopted and effective. We believe this suspension arises out of a less than timid response to the affordable housing crisis

Based upon the lack of compliance with the ordinances listed above, a reasonable person would conclude that many local governments in the region do not feel any need to deal with affordable housing. The only way to address this lack of compliance by local jurisdictions is for Metro to take its own obligations seriously and develop an enforcement structure that conveys the necessity to comply with the ordinances. Providing technical assistance and acting as a "convener" may be one role for Metro to address the affordable housing crisis, but it does nothing to confront the lack of action by local jurisdictions on this issue. Metro should make it a priority to work with local governments to revise their plans and land use regulations to provide the circumstances in which affordable housing may be provided.

Metro must face up to its own obligations in dealing with affordable housing in the region. Regional government is more than admiring furry creatures at a regional zoo or cutting ribbons for projects. Metro was established to deal with regional problems but it has failed to recognize that the equitable distribution of affordable housing is a regional one. There are few more important problems than providing for affordable housing in our region. We call for Metro to be an active participant in resolving the regional housing crisis and pledge to do our best to assure that end.

Sincerely,

Housing Land Advocates



Jennifer Bragar  
President

cc: Via E-Mail:  
Metro Chair Tom Hughes and Councilors  
Martha Bennett  
Emily Lieb  
Jim Rue, DLCD Director  
Richard Whitman  
Margaret VanVliet, Oregon Housing and Community Services Director  
Daniel Ledezma

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