



November 20, 2023

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

**Re: City of Lebanon 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 Lebanon Housing Production Strategy.

HLA and FHCO commend the staff of the City of Lebanon for their diligent work in analyzing the housing needs for current and future residents. The HPS contains some interesting and exciting strategies to meet the City's long-term housing needs. Scaling SDCs and the targeted funding of housing-related infrastructure are particularly promising. However, we find that the selected strategies do not adequately address the housing need for very low and extremely low-income residents.

The contextualized housing need shows that a combined 612 rental units and 64 owner occupied units are needed for these income brackets – a significant portion of the 20-year need – yet very few of the strategies will result in the production of the necessary units. The data provided in the table on page six further indicates significant progress in producing housing accessible to higher income since 2019, even without any changes. This should convince the City to commit greater time and resources to strategies which will result in these underbuilt units coming to fruition.

The contextualized housing need further shows that 20% of the City's current population has a disability, a rate higher Linn County and the Oregon overall. While the document does not elaborate on how much of this population is being underserved by the current housing market, we can infer that it is quite high. Despite this, the HPS contains no strategies which address the need for accessible housing. Some strategies, such as tax incentives and SDC deferrals, may be used to promote accessible housing, but the HPS contains no commitment to that.

We urge DLCD to consider mandating the adoption of strategies which will meet the needs of the City's most underserved populations. 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 that reads "Samuel Goldberg".

Samuel Goldberg  
Education & Outreach Specialist  
Fair Housing Council of Oregon