



The League of Women Voters of Oregon is a 102-year-old grassroots nonpartisan political organization that encourages informed and active participation in government. We envision informed Oregonians participating in a fully accessible, responsive, and transparent government to achieve the common good. LWVOR Legislative Action is based on advocacy positions formed through studies and member consensus. The League never supports or opposes any candidate or political party.

November 17, 2022

To Land Conservation and Development Commission
Anyeley Hallova, Chair
Members of the Commission
Email: Casaria.Taylor@dlcd.oregon.gov

Re: **Agenda Item 6: Oregon Housing Needs Analysis (OHNA) [Proposal](#) - Comments**

The League of Women Voters of Oregon has long been a supporter of our statewide land use planning program **with local implementation**, engaging our members as far back as 1959, while continuing to update our positions, engaging in legislation and rulemaking to reflect those positions, and continuing to focus on **where we ALL live, work, shop and play and how we get there.**

In the early 2000s, Oregon Housing and Community Services (OHCS) Housing Analyst Richard Bjelland provided a Housing/Land Needs Model that noted two important variables that should be considered: age of head of household and household income. *“Household income is the key variable in determining the affordability component of housing needs.”* We share this because, as this proposal moves forward, it’s not that our agencies didn’t realize our processes needed to be updated, but that **it was the staffing, agency and local government funding, and commitment to change that did not move us forward. We cannot let that happen again. Oregonians need housing they can afford--NOW!**

As for this proposal, before you move forward, we do have some concerns. While this proposal offers more comprehensive calculations and consideration of variables, **we implore you and your state agency counterparts, the current and new Governor, and the Legislature to take urgent action on recommendations that will more quickly provide housing opportunities for all Oregonians.**

Among those recommendations are to: **Focus on the use of buildable lots in current cities**, provide funding for infrastructure needs for those lots and provide state funding to offset System Development Charges for development that will house Oregonians with 60% and under AMI with a priority placed on units affordable to extremely low-income households. For those lots, that may mean helping with sidewalks or other transportation requirements or, in some areas, getting them onto city sewer and/or water systems.

Next, help local governments look at their current Urban Growth Boundary (UGB) lands and help them update their Public Facilities Plans so that infrastructure can be provided, again using state and federal funds where appropriate—not only to help with the planning but also funding all or part of those infrastructure needs. (We note that the federal government recently provided additional monies to our Clean Water State Revolving Loan Fund at the Dept. of Environmental Quality—with up to 49% potentially “forgivable” loans.) In our smaller communities, help is needed with grant writing so that they can access funds and update, improve and/or expand their facilities to meet current environmental requirements as well as any increased capacity needs.

We also support a review of those current UGB lands related to wetlands that should not be developed but are assumed “buildable” in city calculations. Wetlands help clean our water and may well be needed as flood protection considering the increase in “atmospheric rivers” forecasted in the future. This same principle should apply to other natural hazards lands. (Cities need to update their Natural Hazards maps

and that may well include your proposals related to Wildfire Adapted Communities. This is another area where cities may well need staffing or funding help.)

We note that the federal government recently provided \$422 million to help our 2020 wildfire victims with housing. Again, focusing on the urgency of now, we recommend that DLCD and OHCS do whatever is needed to assure this money is spent efficiently and effectively. That may take staff assistance in some of the smaller communities.

There are many parts to this proposal. It is visionary, but also complicated. We commend DLCD staff, in particular Housing Planner Sean Edging, for the incredible work contained in this proposal. We appreciated being a part of one of the Work Groups and acknowledge the work of all Work Group members as they provided input. While we may find some small areas of concern, we find much to support.

We also note that others have cited the need for a workforce in the construction industry and planners, permit processors, and building inspectors in our local jurisdictions in order to see that housing is built. And, even as you provide this report to the legislature, we would be remiss if we did not also note that, **besides land use planning process changes and funding, Oregon needs to increase investments in rental assistance, eviction prevention, and preservation of existing low-income units.**

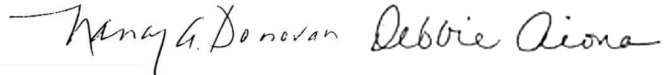
We ask that you help by encouraging the Governor—both current and new—and the Legislature to fund activities that recognize **the urgent need to fund items that increase the supply of safe, decent, and affordable housing.**

We hope you consider our comments as we all move forward to support policies and funding to house ALL Oregonians.

Thank you for the opportunity to discuss this report.



Rebecca Gladstone
President LWVOR



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