



The League of Women Voters of Oregon is a 100-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.

September 21, 2020

To: Land Conservation and Development Commission
Robin McArthur, Chair
Members of the Commission

Email: esther.johnson@state.or.us

Re: Agenda Item 8, Housing Planning Rulemaking (Housing Production Strategy) –
Comments/Support

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 back in 1959. We support the 19 statewide land use Goals. Our extensive studies over the years have addressed Climate Change, Coastal Management, Energy Conservation, Natural Hazards and Water Policy, among others in the Natural Resource area. We also have positions around Housing, including “...to provide a decent home and a suitable living environment for every American family.....at all income levels.....to provide within their boundaries an adequate supply of decent housing for low-and moderate-income groups..... When families or individuals cannot afford decent housing, government should provide assistance in the form of income and/or subsidized housing.” We have appreciated the opportunity to work on these proposed rules with the many lenses through which we work.

Perhaps the most exciting requirement under HB 2003 is that local jurisdictions clearly link Goal 10 with their local housing work. **By requiring jurisdictions to consider not only “units” of housing, but who will live in those units, we may begin to address the true housing need in our state.** The proposed Housing Production Strategy rules are both promising and daunting. **Some of the data collection being asked of local jurisdictions, particularly smaller jurisdictions, may not have a viable source and may be extremely costly for them to provide.** Such requests around Housing tenure, which disabilities exist, and how the people with those specific disabilities are being accommodated, the varied needs of their houseless population, and other specifically called out data requests seem overwhelming. That does not mean we don’t applaud seeking that data, but the Department must be realistic in reviewing a jurisdiction’s Housing Production Strategy document in light of the data available and the capacity of the jurisdiction to provide same.

We continue to push for adding some statement in the “Engagement” section regarding “taxpayers” as a needed group to engage. Taxpayers may be neither Consumers nor Producers of Needed Housing, but businesses and industries for whom jurisdictions may need to convince to help pay for low-income housing. Current data has shown that 25-50% of new housing may need some subsidy.

Overall, we applaud this set of Draft rules and look forward to seeing the data and the public conversations around the state as we work to provide housing for all in a safe and healthy environment.

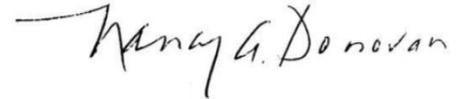
Thank you for the opportunity to discuss these Draft rules.



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