



American Planning Association
Oregon Chapter

Creating Great Communities for All

October 30, 2023

RE: Comments from the Oregon Chapter of the American Planning Association (OAPA) regarding draft housing production framework.

Dear Governor Kotek.

We at OAPA thank you for the opportunity to provide our comments on the draft housing production framework. OAPA is a nonprofit professional membership organization of over 800 planners, working together to create sustainable and vibrant Oregon communities through professional development, advocacy for sound planning, providing resources to meet the challenges of growth and change, and embracing and promoting diversity, inclusion and equity. Together our membership represents countless years of professional experience working directly with developers, local communities, and government agencies to ensure that growth and development reflects these values and meets the needs of present and future Oregonians.

Throughout the fifty-year history of the Oregon land use program, professional planners have carried out the heavy lifting of working directly with local communities to implement requirements adopted at the state level. The important new directives adopted in the last five years to address middle housing production, climate change mitigation, and other critical issues have relied on the work of planners and elected officials of local governments to translate into a working reality in communities across the state.

The experience of implementing these changes on the local level, and participating directly in land use processes related to housing production, give our membership a practical understanding of the issues the draft housing production framework is trying to address. We recognize the dire need for additional housing production in Oregon and throughout the United States, and support most of the concepts presented in the framework. However, proposals for one-time Urban Growth Boundary expansions and changes to discretionary review processes such as adjustments are profoundly flawed from a technical perspective.

Not only would these provisions not lead to increased housing production, but they may also create enough uncertainty and market speculation as to actually discourage potential housing production. In the process, these elements would contribute to irreversible damage to the environment, inequitable outcomes, and the credibility of state and local governments to effectively address the housing crisis.

Some of the items in the Governor's Housing Framework are supported by the OAPA. Other items the OAPA is not opposed to, but request additional clarity or modifications to the proposal as written. Below is a list of items listed in four categories; items OAPA supports, opposes, partially supports but request clarity or modifications, and items OAPA is neutral on. Each of the items included in this section will be discussed in more detail later in this letter.

OAPA supports the following:

- Clarification of HAPO/LUBA roles and Responsibilities.
- Clarify that HAPO staff determine if a claim meets the standards of investigation.
- Addition of voluntary mediation for cities and housing developers.
- Addition of a coordinated role with state agencies involved in the housing development process to support cities and housing developers.
- Exemption from the adjustment requirement for cities that can demonstrate specific criteria, with DLCD review.
- Funding for local governments for site acquisition and readiness for housing.
- Incentive based climate programs for housing.
- Fast-tracking permit applications that meet sustainability criteria with priority given to affordable housing and low-income households.
- Funding to BCD and DLCD to expand ready build plans and model code programs.
- Develop a regional infrastructure coordinator program to support local water, sewer, stormwater, and transportation infrastructure and financing.

OAPA opposes the following:

- The one-time UGB expansion.
- The mandatory adjustment concept as proposed.

OAPA partially support the following, but request clarity or modifications:

- Bill language should include clarifying language that design, and developmental standards related to natural resources and environmental areas include natural hazard areas.
- Mandatory adjustments, if included in the bill, should include a specific sunset date.

- Mandatory adjustments, if included in the bill should specify that they are only to address current housing crisis and not create provisions for permanent mandatory adjustments.
- Mandatory adjustments, if included in the bill, should be tied to production of affordable housing.
- How adjustments are counted is unclear as written. Clarity on counting is required for uniform application of the requirement.
- Limit requiring adjustments to missing middle housing types.
- OAPA supports funding site specific water, sewer, stormwater, and transportation infrastructure for housing, but would encourage an affordability covenant.
- OAPA supports funding for moderate income housing financing, with the majority of funding dedicated to development of affordable housing.
- Temporarily requiring Type III land use application be processed under Type II procedures where it can be demonstrated the change will reduce barriers to needed development.

OAPA is neutral on the following:

- Target minimum density

We offer the comments below in the spirit of cooperation and collaboration to realize both needed housing production and the preservation of our local planning processes and systems that have served the state well thus far.

Note: Text from the Governor's Housing Framework is shown in *italics*.

Comments on Draft Framework: Housing Production Proposal

1. Do you have any additional feedback on the components?

The stated rationale for the HB 3414 adjustment is the need to provide a relief valve, outside of the standard variance process, for development or design standards that are not achievable. If this is the case, in order to get results, the language of HB 3414 needs to be tailored to respond to this particular concern. The enrolled language does that in part by identifying the specific development / design standard thresholds available for adjustment but this concept is muddled by the broad definition of "adjustment," including potentially any "land use regulation". This will lead to challenge and litigation rather than easing housing production.

We suggest adding a provision that incentivizes jurisdictions to audit codes as

was suggested in APA Equity and Zoning policy guide above as part of the HAPO proposal. OAPA generally opposes provisions that work against density.

2. *Do you support or have concerns with the high-level policy changes to the HB3414B components? What additional input or recommendations do you have?*

Creating a new highly discretionary adjustment process controlled entirely by applicants undermines the work of many jurisdictions to create clear and objective standards for housing. Switching the burden of proof away from the applicant and to the local government to justify the denial and further asking local government staff to determine whether denial of a variance is necessary to address a "health, safety or habitability issue" without any process is almost certain to lead to litigation.

The adjustment language still shifts the burden of proving an adjustment should not be granted to the local government, instead of an applicant having to demonstrate that granting the adjustment will result in a public benefit, such as additional housing units. The adjustment language also limits the ability to appeal an adjustment to only the applicant, which is inconsistent with established state law that parties may also appeal a land use decision to LUBA. Further, the possibility of attorney fees assessed against local jurisdictions for improper denials will put reviewers in an unfair and difficult position.

Allowing UGB expansions for increased housing should not be considered unless a housing needs analysis confirms the existing UGB does not have sufficient land or the "up to 150 net residential acres per city."

Developers tend to prefer single-family units on lots below the minimum lot size. While housing is needed, are there additional measures that can be taken to incentives increased density and variety in the type of housing?

The proposed UGB expansions in the Metro region are inappropriate. The Metro UGB contains thousands of acres of vacant buildable land. In addition, Metro has multiple opportunities for cities to petition to expand the UGB. Metro is statutorily required to ensure a 20-year land supply and Metro has a mid-cycle review process where cities have an opportunity to request a UGB expansion every three years. Metro also has the ability to utilize land exchanges at any time, which involves bringing land into the UGB while simultaneously removing land from the UGB that is unlikely to develop in the near term.

3. *Do you support or have concerns with the high-level policy parameters for the additional components? What additional input or recommendations do you have?*

While OAPA continues to oppose the Adjustment concept and the one-time UGB expansion concept as inappropriate tools to address the housing crisis, we do support other concepts such as funding support and technical assistance to jurisdictions to build housing. As noted throughout our comments, we find certain new provisions would lessen the negative impacts of the adjustments and one-time UGB expansions.

4. *As additional policy and technical detail on each of the components is added to draft an LC, what feedback or recommendations would you like to share to inform that process?*

In proposing a change in policy, it is the proponent's obligation to produce the technical studies necessary to show that the change will further increase housing.

Major HB3414B Policy Changes

1. Housing Accountability and Production Office section

Clarification of HAPO/LUBA roles and responsibilities re: appeals
OAPA supports.

b. Clarify that HAPO staff determine if a claim meets the standard of investigation
OAPA supports.

c. Add voluntary mediation for cities and housing developers as a service provided.

OAPA supports. This may be a beneficial service when compromises and agreements cannot be reached that end in land use denials.

d. Add a coordination role with state agencies involved in the housing development process to support cities and housing developers.

OAPA supports.

2. Mandatory design and development adjustments section

Add minimum density threshold for eligibility – projects meeting whichever is greater, the current density minimums in the city's development code, or the following:

.20 dwelling units per acre in Metro

i.5 dwelling units per acre for cities within Baker, Crook, Gilliam, Grant, Harney, Lake, Malheur, Morrow, Sherman, Umatilla, Union, Wallowa, and Wheeler Counties

This section also includes the cities of Dunes City, Florence, and Reedsport

iii. 6 dwelling units per acre for cities within Clatsop, Coos, Curry, Jefferson, Klamath, Lincoln, and Tillamook Counties

iv. 10 dwelling units per acre for all other cities

OAPA agrees with the concept of minimum density as a threshold for regulatory relief as a housing production strategy. However, the minimum density requirements outside of Metro fall well below the level of middle housing. Essentially, the density level being required here is for that of a typical detached residential subdivision; 4,300 square foot lots in most of the state, 7,000 to 9,000 square foot lots in Eastern Oregon and Coastal counties identified. These levels of density do not result in infrastructure savings, or promote development of moderate or affordable unit types. Further, these proposed density targets may conflict with CFEC rules.

b. Add exemption from requirement for cities that can demonstrate, with DLCD review and approval, that:

.A current local process exists for design and development adjustments for all residential development in all areas of the city

ii. All design and development adjustments in HB3414B are eligible adjustments in the existing local process

iii. At least 90% of design and development adjustment requests in the last 10 years have been approved

OAPA supports.

c. Adjust bill language as needed to make it clear that design and development standards related to natural resources and environmental protections are not included

Please include natural hazards such as flood zones, landslides, steep slopes, and mapped high fire hazard areas. Additionally we recommend excluding statewide planning goal-related protections that include coastal, riparian, natural and historic, and scenic. Local government decisions about what qualifies for protection under the goals should be acknowledged while, at the same time, achieving a fair share of housing densities and affordability obligations.

d. To the extent possible, establish objective standards for all design and development adjustments

e. Clarify that each adjustment type, even those listed in the same bullet,

are a single adjustment for the purposes of a maximum of 10 adjustments

OAPA continues to oppose the mandatory adjustments concept as proposed. We do however suggest changes that might improve the concept if it is ultimately included in a future bill.

Consider tying the mandatory adjustments to creating more affordable housing rather than housing production overall. Under Section 2(B)(6), an applicant for an adjustment must demonstrate that at least one of five criteria exist. Two of the criteria are tied to optional affordable housing covenants. Consider making either covenant mandatory. In other words, require that an applicant choose among (a) through (c) and separately choose between (d) or (e).

How adjustments are counted is not clear, which may lead to confusion, lack of uniform application and litigation and delay or prevent housing. The counting should be keyed to each standard to a set maximum of changes (i.e., 10).

While OAPA recognizes the impact to housing production that development and design standards can have, the proposed approach assumes that all codes are deficient and can have the same exemptions. For example, the provision that allows for a 20% reduction in open space does not distinguish between a code that requires the appropriate amount of open space and one that requires more open space than what is needed.

Can the proposal distinguish what provisions are intended for what types of housing? For example, 2.a.I and IV are densities of multi-family housing while 2.a.II and III are more related to low-density (single-family) housing. How does "middle housing" relate? Smaller cities also need some amount of multi-family housing.

Regarding Section 2(4)(b), we appreciate that this provision allows for a reduction in landscaping and open space areas, this provision still maintains stormwater and tree canopy requirements.

Regarding Section (4)(f), it is unclear why there would need to be an adjustment for the required bike parking.

Regarding 2.c, Please specify that tree preservation standards are "not included".

Allowed exemptions should focus on ones that are needed for increasing housing density, housing diversity and housing affordability while still promoting climate mitigation and resiliency as well as racial and environmental justice. Why should the exempt standards include maximum lot sizes, maximum lot widths and depths, or minimum building lot coverage, as these would seem to promote less density?

Clarify what the 10 adjustments relate to. Is it 10 adjustments per project,

per jurisdiction, per application, or per property? We also suggest defining what counts as a standard. For instance if front setbacks differ from side setbacks and the developer is asking for an adjustment on all sides of a rectangular property, does the adjustment count as one, two, or four adjustments?

Section 2(6) states "To qualify for an adjustment under this section, the applicant must state in the application that at least one of the following criteria apply" This seems to require that the applicant justifies the request and necessity of the adjustment. This statement should remain or be bolstered.

f. Separate design and development standards adjustments for detached single family vs middle housing, multifamily, and mixed use residential

.For detached single family housing, remove or modify adjustments that are only applicable to middles housing, multifamily housing, and mixed use residential

OAPA would prefer limiting adjustments for middle, multi-family and mixed use residential. However, many design review standards exist to activate the urban core. Taking this outside the Portland Metro area, consider that the state has given millions of dollars to the Oregon Main Street program to help the economic engine that keeps rural communities to thrive. One of the conditions attached to Main Street dollars is the existence of design guidelines. Throwing these guidelines out on an ad hoc basis makes no sense, particularly when it does not come with specific density or affordability guarantees.

3. One-time alternative UGB expansion process

. Include a demonstration of need requiring cities to meet one of two criteria:

.Need for additional land demonstrated by having 75% of land added to UGB in last 20 years fully annexed and zoned, or

i.Need for additional affordable housing, where:

1. The median home sales price for the previous 12 months exceeded 150% of the affordable home price for a household at 130% AMI, or

2. The median rent for the previous 12 months exceeded 125% of the affordable rent for a household at 80% AMI

b. Adjust minimum density requirements to whichever is greater, the current density minimums in the city's development code, or the

following:

- .20 dwelling units per acre in Metro*
- i.5 dwelling units per acre for cities within Baker, Crook, Gilliam, Grant, Harney, Lake, Malheur, Morrow, Sherman, Umatilla, Union, Wallowa, and Wheeler Counties*
- ii.6 dwelling units per acre for cities within Clatsop, Coos, Curry, Jefferson, Klamath, Lincoln, and Tillamook Counties*
- iv. 10 dwelling units per acre for all other cities*
 - c. Lower the percentage of market rate units that can be constructed in a development prior to construction commencing on affordable or moderate-income housing units (potential change, additional stakeholder feedback needed)*
 - d. Add a claw-back or penalty provision if the affordable or moderate-income housing units are not developed within a certain time frame (potential change, additional stakeholder feedback needed)*

UGB expansions are, by design, intended to be carefully considered in balancing needed land use and in preserving lands valued by Oregonians. The UGB is the cornerstone of land use planning in Oregon. As we decide how to face climate change, extreme weather and the housing shortage, we need to double down on climate-smart, resilient communities located near jobs and transit.

Compact cities and towns, rather than sprawling development, tend to be less dependent on cars, which is good for the environment as well as the community's health. It's easier for residents to walk, bike, or take public transportation, which reduces the city's carbon footprint while also encouraging exercise and decreasing harmful air pollution. Additionally, a higher-density city uses fewer resources.

Every city in Oregon is required to have an urban growth boundary, which must contain enough land for housing, employment, parks and schools for the next 20 years of projected population growth. While we appreciate the greater attention, the proposal takes to the proposed one-time exemption we continue to be strongly opposed to this provision both in principle and in the proposed execution within this legislative concept. Here are few comments on the current draft:

We do appreciate recognizing that there is housing capacity in previous UGB expansions with a.I. However, we do not understand how a.II is relevant. We have not seen any studies that past UGB expansion housing development have resulted in affordable housing, and in fact the economics of infrastructure provision in UGB expansion areas have shown time and again to be a huge challenge to affordable housing production. Why assume it would be different in this case?

b. Proposed UGB expansion areas do not have urban zoning so they will not have any applicable “current density minimums”. This means the “of the following” is de facto density. How do we know it will be the appropriate density for its location or community?

When does planning take place and who does it? A key step in preparing lands in an UGB expansion area is engaging in planning to determine zoning patterns and codes; needed public facilities; needed parks; and transportation system plans including transit. In addition, concept planning involves engaging with other service providers, and particularly important for housing with school districts. How does this one time exemption ensure that the land can be served and integrated into its community in a way that is sustainable for their existing services while promoting racial and environmental justice and climate mitigation?

There is a provision in the 2023 bill that allows for a 600-acre exemption in the Metro region that is in the UGB and an urban reserve. All urban reserves are outside of the UGB. Has this concept been removed?

We continue to advocate that it would be best in terms of more immediate production of housing, affordable housing and a diversity of housing to focus resources and allowances on those lands in the UGB including: lands already or planned to be climate friendly areas; new development allowed under “middle housing” provisions; UGB expansion areas that have been planned or in the process of planning; and lands that could be rezoned for redevelopment or housing conversion — this could, for example, include vacant office buildings that may no longer be in demand for office uses. We are encouraged that many of the new components are steps needed to allow housing production to occur.

e. Potential additional alternative options – cities to choose the main option or one of the alternative options (potential change, stakeholder feedback needed):

.Allow cities to pursue a simplified land exchange to provide acreage and reduce the net impact

OAPA would like more specifics on this concept before commenting.

ii. Allow cities to pursue a smaller scale one-time alternative UGB expansion with fewer requirements than HB3414B in exchange for less acreage.

OAPA opposes this concept, as it presents the same problems as other alternative methods, but on a smaller scale. Depending on the nature of the “fewer requirements,” potential externalities from this concept could actually be greater. Before allowing UGB expansion there should be a requirement to prove that buildable or re-developable land does

not already exist within the UGB and City Limits.

Added Components

1. Funding for local governments for site acquisition and readiness for housing

. Minimum density requirements: whichever is greater, the current density minimums in the city's development code, or the following:

.20 dwelling units per acre in Metro

i.5 dwelling units per acre for cities within Baker, Crook, Gilliam, Grant, Harney, Lake, Malheur, Morrow, Sherman, Umatilla, Union, Wallowa, and Wheeler Counties

ii.6 dwelling units per acre for cities within Clatsop, Coos, Curry, Jefferson, Klamath, Lincoln, and Tillamook Counties

iv. 10 dwelling units per acre for all other cities

b. Geographic distribution:

.At least 20% of funds for cities with populations less than 25,000

i.At least 40% of funds for cities with populations between 25,000 and 100,000

c. Eligible applicants:

.Cities, counties, and tribal councils

i.Special districts in partnership with cities, counties, or tribal councils

ii.Affordable and moderate-income housing developers in partnership cities, counties, or tribal councils

d. Funding structure:

.Grants for regulated low-income housing

i.Revolving loan fund for moderate-income housing

e. Match requirement:

.No match for regulated low-income housing

i.25% match for moderate-income housing

f. Eligible Uses:

.Site acquisition costs

i.Site mitigation and readiness costs

g. Review criteria:

.Prioritization of applications in cities and counties with greatest need or housing

production and housing affordability

i. Prioritization of projects with the highest number of (1) affordable and (2) moderate-income housing units per subsidy

OAPA strongly supports this concept.

2. Funding site specific water, sewer, stormwater, and transportation infrastructure for housing

. Minimum density requirements: whichever is greater, the current density minimums in the city's development code, or the following:

.20 dwelling units per acre in Metro

i. 5 dwelling units per acre for cities within Baker, Crook, Gilliam, Grant, Harney, Lake, Malheur, Morrow, Sherman, Umatilla, Union, Wallowa, and Wheeler Counties

ii. 6 dwelling units per acre for cities within Clatsop, Coos, Curry, Jefferson, Klamath, Lincoln, and Tillamook Counties

iv. 10 dwelling units per acre for all other cities

b. Geographic distribution:

. At least 20% of funds for cities with populations less than 25,000

i. At least 40% of funds for cities with populations between 25,000 and 100,000

c. Eligible applicants

. Cities, counties, and tribal councils

i. Special districts in partnership with cities, counties, or tribal councils

d. Funding structure:

. Grants for regulated low-income housing

i. Forgivable loans for moderate income housing

ii. Revolving loan fund for all other housing

e. Match requirement:

. No match for regulated low-income housing

i. 25% match for moderate-income housing

ii. 50% match for all other housing

f. Eligible uses:

. Site specific construction design and engineering costs

i. Site specific infrastructure construction costs

g. Review criteria:

. Prioritization of cities with greatest need for housing production and housing affordability, and cities with the lowest ability to capitalize infrastructure funding

i. Prioritization of projects with the highest number of (1) affordable and (2) moderate-income housing units per subsidy

h. Delivery mechanism:

. Establish a suballocation within the ODOT immediate opportunity fund for the administering site-specific transportation infrastructure funding for housing projects

ii. Establish a suballocation within the special public works fund for administering site-specific water, sewer, and stormwater infrastructure funding for housing projects

iii. Establish the infrastructure financing authority as a one stop point of contact for accessing site-specific infrastructure funding for housing

1. Require the infrastructure financing authority to coordinate with the Housing Accountability and Production Office in structuring eligibility and use parameters, review and prioritization criteria, etc.

OAPA supports this concept. We note that this concept could be strengthened by requiring an affordability covenant on all future development. Otherwise, this concept only subsidizes the developers and not future owners.

3. Funding for moderate income housing financing

. Minimum density requirements: whichever is greater, the current density minimums in the city's development code, or the following:

.20 dwelling units per acre in Metro

i. 5 dwelling units per acre for cities within Baker, Crook, Gilliam, Grant, Harney, Lake, Malheur, Morrow, Sherman, Umatilla, Union, Wallowa, and Wheeler Counties

ii. 6 dwelling units per acre for cities within Clatsop, Coos, Curry, Jefferson, Klamath, Lincoln, and Tillamook Counties

iv. 10 dwelling units per acre for all other cities

b. Geographic distribution:

. At least 20% of funds for cities with populations less than 25,000

i. At least 40% of funds for cities with populations between 25,000 and 100,000

. Funding, eligibility, and review structure:

Modeled after HB2980A (2023), with policy and technical adjustments

d. Review criteria:

. Prioritization of cities with greatest need for housing production and housing affordability

i. Prioritization of projects with the highest number moderate-income housing units per subsidy

OAPA supports this concept with the suggestion that this funding should represent a fraction of overall funding for housing with the majority of funding dedicated to the development of affordable housing.

4. *Incentive based climate programs for housing*

. Additional funding for heat pumps, building on SB 1536 (2022)

b. Direct Department of Revenue to identify recommendations on developing an Oregon specific heat pump tax credit to complement federal tax credits

OAPA continues to strongly support concepts around funding and tax credits for heat pumps and climate friendly, low impact development incentives.

c. Federal Funding:

. Direct OHCS and state agencies involved in the housing development process to provide housing developers information on current tax incentives and direct pay incentives, both of which are private sector-directed

OAPA supports this concept.

ii. Develop a "Climate Bonus" program for new and existing moderate and low income housing construction

1. Direct agencies to develop a cross-federal funding-sector program to braid programs together and offer a financial bonus incentive if housing construction or retrofits meets certain criteria (e.g., homes that are affordable and comfortable to live in – 100% electric, meet new reach codes, and/or transit-oriented development)

2. Direct ODOE to identify where federal home energy rebates and funds can be prioritized for these types of housing construction and retrofits.

. Electric and efficiency upgrades for housing development and housing retrofits

a. Climate pollution reduction grants prioritizing clean and affordable housing/transportation items identified the state action plans with an emphasis on supporting transit-oriented housing development

b. Solar for All focused on benefits from solar energy to low- income households and disadvantaged communities, with an emphasis on higher density housing

OAPA strongly supports these concepts.

iii. *All federal funding must meet Justice40 benchmarks, where 40% of program benefits must flow to disadvantaged and minority communities.*

. *Geographic distribution:*

. *At least 20% of funds for cities with populations less than 25,000*

i. *At least 40% of funds for cities with populations between 25,000 and 100,000*

a. *Funding, eligibility, and review structure:*

. *Set a table for the intersection of climate and housing for additional stakeholder feedback on these elements*

OAPA supports these concepts.

a. *Additional considerations/options:*

. *Many large cities fast-track permit applications if they meet sustainable criteria. This could be something that the state suggests to local governments.*

OAPA supports this concept and recommends that highest priority be given to affordable housing permit applications and low-income households and second highest priority to projects meeting sustainable criteria.

5. *Temporarily require Type III land use applications for needed housing be processed under Type II procedures*

. *Add exemption from requirement for cities that can demonstrate, with DLCD review and approval, that the requirement creates a financial hardship due to substantial increased costs moving from type III to type II land use review procedures*

OAPA is neutral on this concept, and we request more information regarding the need for this provision and how it is supposed to operate.

6. *Funding to BCD and DLCD to expand ready build plans and model code programs to support local governments and housing developers*

. *These services should be coordinated through the Housing Accountability and Production Office by the respective agencies*

OAPA continues to support this concept.

7. *Funding to study state and local timelines and standards related to public works and building permit application review with recommendations for*

improvements, administered by the Housing Accountability and Production Office

. Research should include the number of required hearings for residential or mixed-use projects and the median time between project milestones (i.e., application filed, application accepted, review of application, public hearing scheduled, project appeal process, environmental review, application approved or denied)

a. Recommendations should include ideas for streamlining review and hearing requirements and processes

This will likely help the new HAPO obtain useful data. The research could also examine permitting numbers and staffing levels.

8. Develop a regional infrastructure coordinator program to support local water, sewer, stormwater, and transportation infrastructure planning and financing

. State staff or contractors to provide temporary capacity support to local governments, special districts and federally recognized tribes in infrastructure planning and financing

a. Support local governments, special districts, and federally recognized tribes in maximizing local financing opportunities, and seeking state and federal opportunities through grant navigation, writing and review, technical support, resource sharing and regional collaboration support

OAPA strongly supports this concept.

Again, OAPA thanks you for the opportunity to comment on the Housing Production Framework.

Sincerely,



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Relevant Resources, Better Planners, Exceptional Communities



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