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ARCHIVES DIVISION

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NOTICE OF PROPOSED RULEMAKING
INCLUDING STATEMENT OF NEED & FISCAL IMPACT

CHAPTER 660
LAND CONSERVATION AND DEVELOPMENT DEPARTMENT

FILED
01/30/2025 10:40 AM
ARCHIVES DIVISION
SECRETARY OF STATE

FILING CAPTION: Update Housing Capacity Analysis Schedule

LAST DAY AND TIME TO OFFER COMMENT TO AGENCY: 03/20/2025 8:30 AM

The Agency requests public comment on whether other options should be considered for achieving the rule's substantive goals while reducing negative economic impact of the rule on business.

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Filed By:
Ingrid Caudel
Rules Coordinator

HEARING(S)

Auxiliary aids for persons with disabilities are available upon advance request. Notify the contact listed above.

DATE: 03/20/2025

TIME: 8:00 AM

OFFICER: LCDC

IN-PERSON HEARING DETAILS

ADDRESS: Department of Land Conservation and Development, 635 Capitol St NE, Basement Hearing Room, Salem, OR 97301

SPECIAL INSTRUCTIONS:

If you intend to testify, please pre-register here so that we have your name in the queue:

<https://www.oregon.gov/lcd/commission/pages/public-comment.aspx>

NEED FOR THE RULE(S)

The Land Conservation and Development Commission (LCDC) is amending the attachment in OAR chapter 660, division 8 to reflect recent Housing Capacity Analysis (HCA) and Housing Production Strategy (HPS) adoptions by local governments and adjust the schedule to accurately reflect forthcoming adoptions. The proposed amendment does not result in changes to any Oregon Administrative Rule language. The proposed amendment is only to update the attachment, which does not impact the manner in which local governments or the public operate within the state's regulatory framework.

DOCUMENTS RELIED UPON, AND WHERE THEY ARE AVAILABLE

Oregon Revised Statute 197A.100 and 197.270. Oregon Administrative Rules chapter 660, division 8. These regulations can be found on the State of Oregon Secretary of State website.

STATEMENT IDENTIFYING HOW ADOPTION OF RULE(S) WILL AFFECT RACIAL EQUITY IN THIS STATE

The State of Oregon requires that a rulemaking notice include "a statement identifying how adoption of the rule will

affect racial equity in this state” (ORS 183.335(2)(b)(F)). Racial equity is a process of eliminating racial disparities and improving outcomes for Black, Indigenous, and other persons of color (BIPOC). It is the intentional and continual practice of changing policies, practices, systems, and structures by prioritizing measurable improvements in the lives of members of BIPOC populations. The agency is required to attempt to determine the racial groups that will be affected by the rule and how the rule will increase or decrease disparities currently experienced by those groups. In this context, a disparate treatment of racial groups may be supportable if it mitigates current disparities.

LCDC adopted Oregon Administrative Rules implementing the Housing Production Strategy Program portion of House Bill 2003 in November 2020. These rules require cities with a population over 10,000, as determined by the Portland State University Population Research Center, to complete a Housing Capacity Analysis (HCA) and Housing Production Strategy (HPS) on a six- year fixed schedule for designated jurisdictions within Metro or eight-year fixed schedule for designated jurisdictions outside of Metro.

The attachment in OAR 660-008-0045 contains the schedule by which certain local governments are required to adopt updated HCAs and HPSs. The schedule is required to comply with HB 2003 [2019] and implement ORS 197A.270(2)(b). LCDC is amending the attachment in OAR 660-008 to reflect recent HCA and HPS adoptions by local governments and adjust the schedule to accurately reflect forthcoming adoptions. The proposed amendment does not result in changes to any Oregon Administrative Rule language. The proposed amendment is only to update the attachment which does not impact the manner in which local governments, or the public operate within the state’s regulatory framework.

Anticipated Racial Equity Impacts

The intent of the rule amendment is to support increased targeted housing production by requiring and supporting cities to update their HCAs and HPSs on a fixed schedule. The amendment will promote racial equity by better tracking data regarding housing needs and availability, especially for households of color. The data gathered through HCA and HPS processes has direct implications for protected classes including Oregonians who identify as BIPOC and who are disproportionately harmed by insufficient housing production and the increasing housing costs that result from underproduction.

Goal 10 requires that cities provide a variety of housing options to Oregonians at all income levels. However, the past framework based needed housing estimates on potentially faulty or incomplete assumptions. The effects of those miscalculations are experienced most critically by low-income communities of color. This amendment brings eligible cities into compliance with Goal 10 by prescribing a framework that allows work toward housing goals to be measured accurately. By updating the analysis regularly, cities have the data to more effectively and accurately plan for affordable, fair, and equitable housing.

While the overall intent of the rule is to promote housing production and equitable outcomes, the proposed amendment may have potentially negative consequences. By moving the deadline for some cities to complete an HCA or HPS to a later date, this may also delay the equity outcomes the rules are intended to achieve. A delay in timeline can result in prolonged or increased housing disparities if these are not documented and addressed in a timely manner.

Future Efforts and Mitigating Impacts

The Department of Land Conservation and Development (DLCD) is concurrently undergoing a separate rulemaking process, directed by the Oregon Legislature under House Bill 2001 [2023], to update rules related to Goal 10 (Housing) and Goal 14 (Urbanization) to create a more comprehensive framework that promotes housing production, affordability, and choice across the state. DLCD staff, with the support of a Rulemaking Advisory Committee, work groups, and a robust engagement process, are in the process of drafting rules that aim to support fair and equitable outcomes in cities and counties across Oregon. The rulemaking process is using a Racial Equity Framework to help ensure the rules maximize benefits and limit burdens for communities of color. By setting later HCA and HPS deadlines for cities until after the new rules can be applied, this will allow more opportunity to advance equity in the long term for communities of color and other marginalized communities.

FISCAL AND ECONOMIC IMPACT:

The proposed rule amendment will likely result in minimal or no fiscal or economic impact to state agencies, local governments, or small and large businesses. The proposed rule amendment only supplements existing programs and does not create or materially alter existing processes.

The Schedule for cities is roughly aligned with biennial funding cycles (2025-27, 2027-29, etc.). In some cases, local governments are given more time to complete an updated housing capacity analysis, which could result in a positive fiscal or economic impact for local governments with limited staff and financial resources by giving them more flexibility and time to apply for grants if needed to complete the work.

COST OF COMPLIANCE:

(1) Identify any state agencies, units of local government, and members of the public likely to be economically affected by the rule(s). (2) Effect on Small Businesses: (a) Estimate the number and type of small businesses subject to the rule(s); (b) Describe the expected reporting, recordkeeping and administrative activities and cost required to comply with the rule(s); (c) Estimate the cost of professional services, equipment supplies, labor and increased administration required to comply with the rule(s).

DLCD is responsible for implementing and enforcing the Goal 10 program per ORS 197A.100 and ORS 197A.270. The department is not economically affected by the proposed amendment because the amendment does not result in any material change to the otherwise anticipated workload of the department.

The proposed amendment will not have any impact on small businesses as they are not subject to requirements in division 8. Further, the proposed amendment only updates the existing Oregon Administrative Rule attachment and does not change the anticipated workload or regulatory framework for small businesses.

DESCRIBE HOW SMALL BUSINESSES WERE INVOLVED IN THE DEVELOPMENT OF THESE RULE(S):

DLCD is responsible for implementing and enforcing the Goal 10 program per ORS 197A.100 and ORS 197A.270. The department is not economically affected by the proposed amendment because the amendment does not result in any material change to the otherwise anticipated workload of the department.

The proposed amendment will not have any impact on small businesses as they are not subject to requirements in division 8. Further, the proposed amendment only updates the existing Oregon Administrative Rule attachment and does not change the anticipated workload or regulatory framework for small businesses.

DLCD did not convene a rulemaking advisory committee or conduct stakeholder engagement for this specific rule amendment. However, the initial amendments to division 8 completed in 2020 to incorporate HB 2003 [2019] and ORS 197A.100 and 197A.270 requirements were the result of a year long intensive advisory committee and public engagement process. Updates to division 8 in 2024 pursuant to HB 2001 [2023] were similarly responsive to recommendations from advisory committees and extensive community engagement. Small businesses, though they are not directly impacted by the standards in OAR chapter 660, division 8, participated on the rulemaking advisory committee and engagement process.

WAS AN ADMINISTRATIVE RULE ADVISORY COMMITTEE CONSULTED? NO IF NOT, WHY NOT?

DLCD did not convene a rulemaking advisory committee or conduct stakeholder engagement for this specific rule amendment. The proposed amendment is only necessary to update the attachment to reflect recent local government housing capacity analysis adoptions. This amendment does not materially alter the regulatory framework or requirements in OAR 660-008 and only provides additional guidance and resources for local governments participating in the housing capacity analysis program.

HOUSING IMPACT STATEMENT:

Description of proposed change: (Please attach any draft or permanent rule or ordinance) The Attachment in OAR 660-008-0045 contains the schedule by which certain local governments are required to adopt updated Housing Capacity Analyses and Housing Production Strategies. The schedule is required to comply with HB 2003 [2019] and implement ORS 197A.270(2)(b).

Description of the need for, and objectives of the rule: LCDC is amending the attachment in OAR 660-008-0045 to reflect recent Housing Capacity Analysis and Housing Production Strategy adoptions by local governments. The proposed amendment does not result in changes to any Oregon Administrative Rule language. The proposed amendment is only to update the attachment which does not impact the manner in which local governments or the public operate within the state's regulatory framework.

List of rules adopted or amended: OAR 660-008-0045

Materials and labor costs increase or savings: The proposed amendment does not materially alter the regulatory framework, intent, or implementation of OAR 660-008-0045. The proposed amendment only updates the attachment in the rule section to reflect recent local housing capacity analysis adoptions by local governments. The proposed amendment does not result in any change in housing materials and labor costs, positive or negative.

Estimated administrative construction or other costs increase or savings: The proposed amendment does not result in any change to estimated administrative construction or other costs, positive or negative.

Land costs increase or savings: The proposed amendment does not result in any change to land costs, positive or negative.

Other costs increase or savings: The proposed amendment does not result in any change to the cost incurred by local governments or the development of housing, positive or negative.

Housing Capacity Analysis Update Schedule for Oregon Cities with a population above 10,000 and all cities and some unincorporated communities in Tillamook County
 (Required by ORS 197.296)

OAR 660-008-0040 – Exhibit A

Last Updated January 29, 2025

This schedule is to be adopted by the Land Conservation and Development Commission (LCDC) in January of each year. Cities must adopt Housing Capacity Analysis (HCA) and Housing Production Strategy (HPS) by December 31st of the listed year.

HCA-HPS Schedule for 2025-2033

	2025	2026	2027	2028	2029	2030	2031	2032	2033
Cities in a Metro Service District (six-year cycle)									
Beaverton					HCA	HPS			
Cornelius			HCA	HPS					HCA
Fairview			HCA	HPS					HCA
Forest Grove			HCA	HPS					HCA
Gladstone			HCA	HPS					HCA
Gresham					HCA	HPS			
Happy Valley	HPS			HCA	HPS				
Hillsboro					HCA	HPS			
Lake Oswego					HCA	HPS			
Milwaukie					HCA	HPS			
Oregon City			HCA	HPS					HCA
Portland					HCA	HPS			
Sherwood			HCA	HPS					HCA
Tigard			HCA	HPS					HCA
Troutdale			HCA	HPS					HCA
Tualatin			HCA	HPS					HCA
West Linn	HPS				HCA	HPS			
Wilsonville	HCA/ HPS					HCA	HPS		

	2025	2026	2027	2028	2029	2030	2031	2032	2033
Housing Coordination Strategy (HCS)									
Metro Regional Government	HCS						HCS		

	2025	2026	2027	2028	2029	2030	2031	2032	2033
Metro Counties									
Clackamas									
Multnomah									
Washington									

	2025	2026	2027	2028	2029	2030	2031	2032	2033
Cities outside of Metro Service Districts (eight-year cycle)									
Albany				HCA	HPS				
Ashland						HCA	HPS		
Astoria			HCA	HPS					
Baker City						HCA	HPS		
Bend			HCA	HPS					
Canby*	HPS					HCA	HPS		
Central Point			HCA	HPS					
Coos Bay				HCA	HPS				
Corvallis			HCA	HPS					
Cottage Grove			HCA	HPS					
Dallas				HCA	HPS				
The Dalles	HPS						HCA	HPS	
Eugene		HCA	HPS						
Grants Pass						HCA	HPS		
Hermiston					HCA	HPS			
Independence	HPS						HCA	HPS	
Keizer			HCA	HPS					
Klamath Falls				HCA	HPS				
La Grande				HCA	HPS				
Lebanon						HCA	HPS		
Lincoln City			HCA	HPS					
McMinnville*	HPS						HCA	HPS	
Medford							HCA	HPS	
Molalla	HPS						HCA	HPS	
Monmouth							HCA	HPS	
Newberg	HPS							HCA	HPS
Newport						HCA	HPS		
North Bend						HCA	HPS		
Ontario					HCA	HPS			
Pendleton*	HCA	HPS			HCA	HPS			
Prineville			HCA	HPS					

Redmond			HCA	HPS					
Roseburg			HCA	HPS					
Salem	HPS					HCA	HPS		
Sandy	HPS							HCA	HPS
Silverton				HCA	HPS				
Springfield			HCA	HPS					
St. Helens			HCA	HPS					
Sweet Home							HCA	HPS	
Woodburn			HCA	HPS					
	2025	2026	2027	2028	2029	2030	2031	2032	2033
Cities and SB 406 (2023) named communities in Tillamook County (eight-year cycle)									
Bay City			HCA	HPS					
Garibaldi			HCA	HPS					
Nehalem			HCA	HPS					
Manzanita			HCA	HPS					
Rockaway Beach			HCA	HPS					
Tillamook			HCA	HPS					
Wheeler			HCA	HPS					
Unincorporated Communities**			HCA	HPS					

*City under approved DLCD workplan.

**Tillamook County's unincorporated communities included in the HCA/HPS work of ORS 197.296 include: Barview/Twin Rocks/Watseco, Cloverdale, Hebo, Neahkanie, Neskowin, Netarts, Oceanside, and Pacific City/Woods

Important Revisions in the 2025 HCA Schedule Update (March 2025)

Pursuant to OAR 660-008-0045 (4)(a) and (4)(b), cities with a population of 10,000 or greater, determined by a certified population estimate from the Portland State University Population Research Center, must adopt a Housing Capacity Analysis (HCA) on a regular schedule. Cities have the flexibility to adopt an HCA at any time before the scheduled year. Note #4 on the adopted HCA Schedule from November 2020 specifies, 'Those cities that adopt an HCA prior to their listed deadline will reset the schedule.' Cities within a metropolitan service district will renew 6 years after the actual adoption date, while cities outside of a metropolitan service district will renew 8 years after the actual adoption date. For example, the city of Salem adopted an HCA in 2022, and thus will adopt a subsequent HCA 8 years later, in 2030.

Pursuant to ORS 197.290, a city's Housing Production Strategy (HPS) must be completed by December 31st one year after the city's HCA adoption deadline. Cities can opt for early HCA adoption, resetting the timing for the next analysis to six or eight years from the most recent adoption year. However, it does not alter the deadline for completing the associated HPS, which remains due one year after the initial HCA deadline. For the subsequent adoption cycle, the new HCA deadline determines the deadline for completing the next HPS. Cities may also request an extension under OAR 660-008-0065 (1). In that circumstance, the extension does not alter the subsequent deadline – it remains 8 years after the original deadline.

Additionally, on December 15th each year, the Population Research Center at Portland State University publishes certified population estimates for every city and county in Oregon. These estimates are used by the Department to determine whether a city has surpassed the 10,000-population threshold, subjecting them to the Housing Capacity Analysis and Housing Production Strategy Program. In the estimates published on December 15, 2023, no cities were certified to newly meet or exceed this threshold. However, Metro region counties (Clackamas, Washington, and Multnomah) were legislatively added to the schedule as participating jurisdictions.

Cities Granted Extension in 2024

Several cities were granted deadline extensions into the following calendar year, 2025. Cities granted extensions in 2024 include:

- The Dalles
- Happy Valley
- Independence
- McMinnville
- Molalla
- West Linn

City of Pendleton Update:

The City of Pendleton did not meet its initial HCA deadline of December 31, 2022 nor the mutually agreed-upon modified deadline of December 31st, 2023. In 2024, in accordance with the enforcement guidelines outlined in OAR 660-008-0065(2), the City has entered into a workplan with DLCD and is under contract with a DLCD-selected consultant to come back into compliance. For subsequent cycles, Pendleton will maintain the original 8-year schedule, meaning the next HCA adoption will be due in 2030.

HCA Update Notes on Administration:

1. The deadline for adoption in any given year will be December 31.
2. A city fulfills its obligation to adopt the HCA update upon local-level adoption by ordinance. Any subsequent appeal does not constitute a failure to comply with the update requirement.
3. The date of final adoption of the HCA at the local level will establish the next HCA update deadline. The subsequent update deadline will be six or eight years in the future, contingent on whether the city is within the boundary of a metropolitan service district.
4. Cities adopting an HCA before the listed deadline effectively "reset the clock," with the next applicable HCA deadline set six or eight years after the early adoption, based on metropolitan service district inclusion.
5. The Land Conservation and Development Commission completed rulemaking on housing production strategies (HPSs) in the fall of 2020 and adopted HPS rules as amendments to OAR Chapter 660, Division 8 on November 12, 2020.
6. Notably, the city must adopt the HCA by ordinance for the HCA update deadline to be met, typically as a supporting document to the city's comprehensive plan. Adoption by ordinance enables city decision-makers to utilize the HCA as a legally defensible basis for decision-making.
7. Consistent with OAR Section 660-024-0050(4), a city must address a land deficit identified in the HCA before or concurrently with HCA adoption. The local government must amend the plan to satisfy the need deficiency, either by increasing the development capacity of existing land within the city, expanding the Urban Growth Boundary (UGB), or both.
8. A city that adopts an HCA after December 31, 2021 but in a year that is prior to the deadline established in this schedule is required to complete a Housing Production Strategy one year after the city's established HCA deadline. A city may complete a Housing Production Strategy prior to the established deadline.
9. House Bill 2001 (2023 session) directs the Land Conservation and Development Commission (LCDC) to establish a housing production target schedule. The relevant housing production target is aligned with the adoption year of the Housing Capacity Analysis. In Metro cities, the six-year housing production target extends from the adoption year of the analysis, while for cities outside of Metro, the eight-year housing production target follows the adoption year. The tracking period commences on January 1st of the calendar year, providing clear timing for the Housing Production Target.

AMEND: 660-008-0045

RULE SUMMARY: The Attachment in OAR 660-008-0045 contains the schedule by which certain local governments are required to adopt updated housing capacity analyses. The schedule is required to comply with HB 2003 [2019] and implement Oregon Revised Statute 197A.270(2)(b).

CHANGES TO RULE:

660-008-0045

Housing Capacity Analysis Deadline

Cities described in ORS 197A.270, 197A.280, and 197A.335 shall adopt a housing capacity analysis and adopt a housing production strategy as scheduled by the commission.¶

(1) The department shall publish the schedule of housing capacity analyses and housing production strategies deadlines for cities identified under ORS 197A.270, 197A.280, and 197A.335 in Attachment A.¶

(2) The deadline for adoption of a housing capacity analysis and a housing production strategy in a given year is December 31st.¶

(3) The department will consider a city to have met its obligation to adopt a housing capacity analysis upon adoption of the housing capacity analysis by ordinance. The department will not consider a subsequent appeal of the city ordinance adopting its housing capacity analysis a failure to comply with the deadline provided in Attachment A provided in section (1).¶

(4) The department will consider a city to have met its obligation to adopt a housing production strategy upon adoption of the housing production strategy. As provided in ORS 197A.100(7), the adoption of a housing production strategy is not a land use decision and is not subject to appeal or review except as provided in ORS 197A.103.¶

(5) Upon adoption of a housing capacity analysis, the deadline for a subsequent housing capacity analysis is as follows:¶

(a) Eight years subsequent for cities that are not within Metro; or¶

(b) Six years subsequent for cities that are within Metro.¶

(6) The housing production strategy is due one year after the city's deadline for completing a housing capacity analysis, as prescribed in section (1).¶

(7) The applicable allocation of housing need and housing production target, as provided in ORS 184.451 to 184.455, are those that are most recent in the year of the adoption of the housing capacity analysis.¶

(8) If a population estimate developed under ORS 195.033 and OAR 660-032-0020 and OAR 660-032-0030 results in a city qualifying under ORS 197A.270, 197A.280, and 197A.335, the city must adopt a housing capacity analysis within two years of its qualification or the interval provided in section (5), whichever is the longer period.

Statutory/Other Authority: ORS 197.040

Statutes/Other Implemented: ORS 197A.015 - 197A.470

RULE ATTACHMENTS MAY NOT SHOW CHANGES. PLEASE CONTACT AGENCY REGARDING CHANGES.

Housing Capacity Analysis Update Schedule for Oregon Cities with a population above 10,000 and all cities and some unincorporated communities in Tillamook County (Required by ORS 197.296)

OAR 660-008-0045 – Exhibit A

Last Updated January 29, 2024

This schedule is to be adopted by the Land Conservation and Development Commission (LCDC) in January of each year. Cities must adopt Housing Capacity Analysis (HCA) and Housing Production Strategy (HPS) by December 31st of the listed year.

HCA-HPS Schedule for 2025-2033

		Cities outside of Metro (eight-year cycle)								
		2025	2026	2027	2028	2029	2030	2031	2032	2033
Cities outside of Metro (eight-year cycle)	Albany				HCA	HPS				
	Ashland						HCA	HPS		
	Astoria				HCA	HPS				
	Baker City						HCA	HPS		
	Bend			HCA	HPS					
	Canby	HPS						HCA	HPS	
	Central Point			HCA	HPS					
	Coos Bay				HCA	HPS				

	Corvallis			HCA	HPS				
	Cottage Grove			HCA	HPS				
	Dallas				HCA	HPS			
	The Dalles						HCA	HPS	
	Eugene		HCA	HPS					HCA
	Grants Pass						HCA	HPS	
	Hermiston					HCA	HPS		
	Independence						HCA	HPS	
	Keizer			HCA	HPS				
	Klamath Falls				HCA	HPS			
	La Grande				HCA	HPS			
	Lebanon						HCA	HPS	
	Lincoln City			HCA	HPS				
	McMinnville	HPS							HCA HPS

	Medford						HCA	HPS		
	Molalla						HCA	HPS		
	Monmouth						HCA	HPS		
	Newberg							HCA	HPS	
	Newport						HCA	HPS		
	North Bend						HCA	HPS		
	Ontario					HCA	HPS			
	Pendleton	HCA/HPS					HCA	HPS		
	Prineville			HCA	HPS					
	Redmond			HCA	HPS					
	Roseburg			HCA	HPS					
	Salem						HCA	HPS		
	Sandy						HCA	HPS		
	Silverton				HCA	HPS				

	Springfield			HCA	HPS					
	St. Helens			HCA	HPS					
	Sweet Home							HCA	HPS	
	Wheeler city									
	Woodburn			HCA	HPS					
Tillamook County (eight-year cycle)										
		2025	2026	2027	2028	2029	2030	2031	2032	2033
Tillamook County (eight-year cycle)	Bay City city			HCA	HPS					
	Garibaldi city			HCA	HPS					
	Manzanita city			HCA	HPS					
	Nehalem city			HCA	HPS					
	Rockaway Beach city			HCA	HPS					
	Tillamook city			HCA	HPS					
Cities in Metro (six-year cycle)										

Cities in Metro (six-year cycle)		2025	2026	2027	2028	2029	2030	2031	2032	2033
	Beaverton					HCA	HPS			
	Cornelius			HCA	HPS				HCA	HPS
	Fairview			HCA	HPS				HCA	HPS
	Forest Grove			HCA	HPS				HCA	HPS
	Gladstone			HCA	HPS				HCA	HPS
	Gresham					HCA	HPS			HCA
	Happy Valley				HCA	HPS				
	Hillsboro					HCA	HPS			
	Lake Oswego					HCA	HPS			
	Milwaukie					HCA	HPS			
	Oregon City			HCA	HPS				HCA	HPS
	Portland					HCA	HPS			HCA
Sherwood			HCA	HPS				HCA	HPS	

	Tigard			HCA	HPS				HCA	HPS
	Troutdale			HCA	HPS				HCA	HPS
	Tualatin			HCA	HPS				HCA	HPS
	West Linn					HCA	HPS			
	Wilsonville					HCA	HPS			
Metro UULs										
Housing Coordination Strategy (HCS)										
	Metro Regional Government	HCS						HCS		