



CITY OF BEAVERTON  
Planning Division  
Community Development Department  
Tel: 503-526-2420  
[www.beavertonoregon.gov](http://www.beavertonoregon.gov)

## STAFF REPORT

**Report date:** July 12, 2023

**Application/project name:** LU42023-00247 Housing Needs Analysis

**Application Numbers:** CPTA42023-00245

**Proposal:** The City of Beaverton proposes to amend the Beaverton Comprehensive Plan to implement the Housing Needs Analysis as part of the Housing Beaverton Project. Proposed Comprehensive Plan amendments update Volume I: Chapter Three, Land Use Element, and Chapter Four, Housing Element, based on the findings of the Housing Needs Analysis. Other proposed amendments include updating Volume II: Background & Supporting Documents to replace older documents with the 2023 Housing Needs Analysis Report.

**Proposal location:** Citywide

**Applicant:** City of Beaverton

**Approval Criteria:** Comprehensive Plan Section 1.5.1

**Recommendation:** Staff recommend the Planning Commission review the proposal, take public testimony, deliberate on the proposal, and make a recommendation to City Council.

**Hearing information:** Zoom Webinar beginning at 6:30 p.m. July 19, 2023. Public hearings are held remotely and can be viewed at the following link: <https://www.beavertonoregon.gov/291/Agendas-Minutes>

**Contact information:**

City staff representative: Jena Hughes, Associate Planner  
503-526-3725  
[jhughes@beavertonoregon.gov](mailto:jhughes@beavertonoregon.gov)

Brian Martin, Long Range Planning Manager  
971-708-8894  
[bmartin@beavertonoregon.gov](mailto:bmartin@beavertonoregon.gov)

# Background

The Housing Needs Analysis (HNA) is a component of the Housing Beaverton Project, which is designed to identify people’s housing needs and determine what actions the city can take to promote the creation of housing that meets community members’ needs. City staff worked with a consultant team led by APG/MIG to conduct the Housing Needs Analysis, which is a comprehensive study of housing needs, buildable lands, and potential policies and strategies to address current and future housing in the Beaverton community over the next 20 years. A 2019 state law requires the city to complete a Housing Needs Analysis every six years. Beaverton’s last housing analysis was completed in 2015.

The Housing Beaverton Project to create the Housing Needs Analysis was designed with equity at the forefront to understand housing need beyond affordability alone, especially for those with historically limited access to housing and for groups that have been historically excluded in housing and land use conversations. The project aims to understand the housing needs of all residents based on diverse lived experiences and living situations to inform what action is needed to address identified housing needs.

City staff presented the draft Housing Needs Analysis report, along with the draft Housing Production Strategy report, to the Planning Commission on April 12, 2023, and to the City Council on April 18, 2023, and received support for both documents.

## Proposed Comprehensive Plan Amendments

### Volume I – Comprehensive Plan

The proposed Comprehensive Plan Amendments for Volume I are attached in **Exhibit A**. A summary of the changes is below.

#### Chapter 3: Land Use Element

The draft amendments in this chapter update references to “single-family” and “multifamily” housing to reflect revised terminology.

#### Chapter 4: Housing Element

Under Context; 4.1 Housing Supply; 4.2 Housing Type; 4.3 Housing in and near the Downtown Regional Center; and 4.4 Fair and Affordable Housing, text is updated to reflect the data and findings from the most recent Housing Needs Analysis, which will be included in Volume II: Background and Supporting Documents. These sections include references to the 2014 Housing Survey and other data and trends that are now out of date. The text and policies in this chapter are updated accordingly.

### Volume II – Background and Supporting Documents

The proposed amendments for Volume II of the Comprehensive Plan, Background and Supporting Documents, include adding the 2023 Housing Needs Analysis Report with appendices (**Exhibit B**) and removing the existing Buildable Lands Inventory and Housing Strategies Report. Below is a summary of key findings described in the report:

- **Affordability:** The housing that is currently available and being built does not align with what households can afford, particularly for households with lower incomes.
- **Rental housing:** The greatest unmet need is for households making less than \$35,000 per year.
- **Ownership housing:** There is currently a need for more ownership housing at lower price points, while the middle to upper end of the market is well supplied. Most households in Beaverton cannot afford the homes that have recently sold in the city. The median sale price of homes sold in 2022 was \$518,500, and 77 percent of recent sales took place above the \$400,000 price level. Homes in this range should be mostly affordable to households earning at least \$100,000 per year, or an estimated 37 percent of local households.
- **Gentrification and displacement:** Neighborhoods most vulnerable to gentrification and displacement largely correspond with areas of lower median household income and Black, Indigenous and People of Color households, such as in the central and southeastern parts of the city.
- **Population growth:** Beaverton’s population is projected to grow by more than 19,000 people by 2042. Beaverton needs nearly 9,900 new housing units to accommodate the projected growth.
- **Priority populations:** Low-income households; households of color; immigrants and refugees; people with disabilities; seniors; people experiencing homelessness.
- **Buildable Lands Inventory:** Beaverton’s total housing capacity over the next 20 years is 14,987 units. Many of these units will come from South Cooper Mountain and Cooper Mountain, but there will be new development and redevelopment in the rest of the city as well. While there is sufficient land capacity to accommodate the need for future housing units, interventions will be needed to ensure the housing that is produced meets the needs of priority populations.
- **Housing types needed:** More middle housing and a smaller share of single-detached homes are anticipated to be needed. The housing forecast includes a shift toward more ownership units. The share of multi-dwelling units is projected to stay relatively constant (around 33 to 34 percent). There is also a need for homes that can accommodate large and multigenerational households, which are more common in communities of color. Approximately 1,190 new housing units by 2042 (12 percent of overall need) will need to have accessibility considerations for people with varying disabilities and needs.

# Table of Contents

STAFF REPORT.....	1
Background .....	2
Section 1.3 Amendment Procedural Categories.....	6
Section 1.4.1 Notice Requirements for Legislative Amendments .....	6
Section 1.5.1 Criteria for Legislative and Quasi-Judicial Comprehensive Plan Amendments .....	8
Comprehensive Plan .....	8
Metro Urban Growth Management Functional Plan.....	12
Title 1: Housing Capacity (Sections 3.07.110 – 3.07.120).....	12
Title 7: Housing Choice (Sections 3.07.710 – 3.07.750) .....	13
Title 8: Compliance Procedures (Sections 3.07.810 – 3.07.870).....	13
Metro Regional Functional Transportation Plan.....	14
Title 5: Amendment of Comprehensive Plans .....	14
Statewide Planning Goals .....	14
Goal 1: Citizen Involvement.....	14
Goal 2: Land Use Planning.....	16
Goal 10: Housing.....	16
Goal 14: Urbanization.....	18
Oregon Administrative Rules.....	18
OAR 660-007-0030 New Construction Mix .....	18
OAR 660-007-0033 Consideration of Other Housing Types .....	19
OAR 660-007-0035 Minimum Residential Density Allocation for New Construction.....	20
OAR 660-007-0045 Computation of Buildable Lands .....	20
OAR 660-008-0010 Allocation of Buildable Land.....	21
OAR 660-008-0030 Regional Coordination .....	22
OAR 660-008-0045 Housing Capacity Analysis Deadline.....	22
Oregon Revised Statutes .....	23
ORS 197.296 Analysis of housing capacity and needed housing by Metro, cities outside of Metro and smaller cities; accommodation of housing need.....	23
ORS 197.297 Analysis of housing capacity and needed housing in Metro cities.....	24
CONCLUSION & RECOMMENDATION .....	25

## **Exhibits**

Exhibit A. Proposed Comprehensive Plan Amendments: Volume I

Exhibit B. Housing Needs Analysis Report

Exhibit C. Public Engagement Summary

## **Tables**

Table 1. Estimate of 20-Year Housing (2042)

Table 2. Summary of Residential Capacity

Table 3. Net Buildable Acres and Estimated Units of Residential Land by Zoning Designation

Table 4. Net Buildable Acres of Mixed Use Land by Zoning Designation

Table 5. Comparison of Housing Growth (2022-2042) With Land Supply

# LU42023-00247 Housing Needs Analysis (CPTA42023-00245)

## ANALYSIS AND FINDINGS FOR COMPREHENSIVE PLAN TEXT AMENDMENT

**Recommendation:** Based on the facts and findings presented below, staff recommends the Planning Commission review the proposal, take public testimony, deliberate on the proposal, and make a recommendation to City Council.

### Section 1.3 Amendment Procedural Categories

Legislative Amendments are amendments to the Comprehensive Plan text or map of a generalized nature initiated by the City that applies to an entire land use map category or a large number of individuals or properties or that establishes or modifies policy or procedure. Legislative amendments include additions or deletions of text or land use map categories.

#### FINDING

The proposed amendment includes additions and deletions of the text in the Comprehensive Plan.

**Conclusion:** Therefore, staff finds that Section 1.3 applies.

### Section 1.4.1 Notice Requirements for Legislative Amendments

Section 1.4.1.A says that notice of the initial hearing shall be provided as follows:

1. By providing the required inter-agency Department of Land Conservation and Development (DLCD) notice to DLCD, Metro, and Washington County at least thirty-five (35) calendar days prior to the initial hearing. When the legislative amendment is required through Periodic Review, DLCD notice is not required, therefore, it is not provided;
2. By mailing the required inter-agency DLCD notice to all Neighborhood Association Committee (NAC) chairs and Community Participation Organizations (CPO) in whose area there is property that in the Director's opinion could be affected by the proposed ordinance if adopted, and the Chair of the Beaverton Committee for Community Involvement, at least thirty-five (35) calendar days prior to the initial hearing;
3. Mail notice to owners of property within the City for which the proposed ordinance, if adopted, may in the Director's opinion affect the permissible uses of land a. The most recent property tax assessment roll of the Washington County Department of Assessment and Taxation shall be used for determining the property owner of record.

The failure of a property owner to receive notice does not invalidate the decision. b. If a person owns more than one property that could be affected by the proposed ordinance if adopted, the Director may mail that person only one notice of the hearing;

4. By publication of a notice with the information specified in subsection 1.4.1 B.1, 2, and 3 in a newspaper of general circulation within the City;
5. By posting a notice with the applicable information specified in subsection 1.4.1 B at Beaverton City Hall and the Beaverton City Library; and
6. By placing a notice with the applicable information specified in subsection 1.4.1 B on the City's website.

Section 1.4.1.B states that mailed notice required in subsection 1.4.1.A.3., posted notice required in subsection 1.4.1.A.5., and web notice required in subsection 1.4.1.A.6. shall:

1. State the date, time and location of the hearing, and the hearings body;
2. Explain the nature and purpose of the hearing;
3. Include the case file number, title or both of the proposed ordinance to be considered at the time of hearing;
4. List the applicable approval criteria by Comprehensive Plan by section numbers that apply to the application at issue;
5. State that a copy of the application, all documents and evidence submitted by or on behalf of the applicant, and applicable criteria are available for inspection at no cost and will be provided at reasonable cost and include the days, times and location where available for inspection;
6. State that a copy of the staff report will be available for inspection at no cost at least seven (7) calendar days prior to the hearing and will be provided at reasonable cost and include the days, times and location where available for inspection;
7. Include the name and phone number of the City staff person assigned to the application from whom additional information may be obtained;
8. State that failure of an issue to be raised in a hearing, in person or by letter, or failure to provide statements or evidence sufficient to afford the Planning Commission an opportunity to respond to the issue precludes appeal to the City Council and the Land Use Board of Appeals based on that issue; and
9. Include a general explanation of the requirements for submission of testimony and procedure for conduct of the hearing.

## FINDING

Consistent with Statewide Planning Goal 1 and Comprehensive Plan Section 1.4.1, public notice was provided at least 35 days before the first evidentiary hearing to Neighborhood Association Committee chairs, the chairs of relevant Washington County Community Participation Organizations, the Chair of the Beaverton Committee for Community Involvement, the Department of Land Conservation and Development, Metro and the Washington County Department of Land Use and Transportation. The notice

provided the required information in Comprehensive Plan Section 1.4.1.B. In addition, a notice was published in the Beaverton Valley Times newspaper and posted at Beaverton City Hall, the Beaverton City Library, and on the City’s website between 20 and 40 days before the Planning Commission’s initial hearing.

**Conclusion:** Therefore, staff finds that the city has provided adequate notice consistent with Section 1.4.1.

## Section 1.5.1 Criteria for Legislative and Quasi-Judicial Comprehensive Plan Amendments

Section 1.5.1.A says the following criteria apply to all legislative Comprehensive Plan amendments and non-annexation-related quasi-judicial Comprehensive Plan Amendments:

1. The proposed amendment is consistent and compatible with relevant Statewide Planning Goals and related Oregon Administrative Rules
2. The proposed amendment is consistent and compatible with the applicable Titles of the Metro Urban Growth Management Functional Plan and the Regional Transportation Plan
3. The proposed amendment is consistent and compatible with the Comprehensive Plan and other applicable local plans.

### FINDING

Consistency with applicable Statewide Planning Goals, Oregon Administrative Rules, Titles of the Metro Urban Growth Management Functional Plan, and the Regional Transportation Plan is described in later sections of this report.

## Comprehensive Plan

Beaverton’s Comprehensive Plan procedures in Chapter 1 have been followed as described above under Section 1.3, Section 1.4.1, and Section 1.5.1. Other relevant goals and policies are provided below.

### Chapter 3: Land Use Element

#### Goal 3.1.1 Encourage development and land use patterns that support a variety of transportation options

**Policy j)** Encourage use of structured, underground, and/or tuck-under parking for commercial, office, and multifamily development.

The proposed amendment updates Policy j to replace “multifamily” with “middle housing and multi-dwelling” development. This terminology was revised in the Development Code and other parts of the Comprehensive Plan with the adoption of the Housing Options Project in 2022. The original definition of multifamily includes developments with



two or more attached units. Beaverton’s housing policies are already supportive of middle housing development.

**Goal 3.3.1 Promote sustainable development, resilience, and resource protection**

**Policy a)** Use land effectively in urban areas to relieve development pressure in rural areas and help protect farms, forests and natural resources.

The proposed amendment includes a Housing Needs Analysis Report with an updated Buildable Lands Inventory (Appendix F). According to the Buildable Lands Inventory, there is sufficient residential land to meet future housing needs within current Beaverton city limits and in Cooper Mountain. Adjusting the Urban Growth Boundary to designate more land for housing will not be necessary. The Urban Growth Boundary relieves development pressure in rural areas and helps protect farms, forests, and natural resources by concentrating development in urban areas such as Beaverton. The city’s existing zoning approach promotes efficient use of land through tools such as minimum densities and in the past has been found consistent with this policy.

**Goal 3.6.5 Mixed Use Corridor: Promote a mix of residential and commercial uses that complement and serve adjacent neighborhoods in a pedestrian-friendly environment**

**Policy b)** Allow for and encourage multifamily and single family attached housing as part of vertical mixed use developments and as stand-alone uses between and behind commercial nodes at intersections.

The proposed amendment replaces “multifamily and single family attached housing” with “multi-dwelling and middle housing” to reflect revised terminology. This terminology was revised in the Development Code and other parts of the Comprehensive Plan with the adoption of the Housing Options Project in 2022. Beaverton’s housing policies are already supportive of middle housing development.

**Chapter 4: Housing**

**Goal 4.1.1 Provide an adequate supply of housing to meet future needs**

The proposed amendment includes a Housing Needs Analysis and updates to text and policies in Volume I of the Comprehensive Plan to ensure Beaverton promotes housing supply to meet future needs. The proposed amendment updates text in Chapter 4: Housing Element under Context; 4.1 Housing Supply; 4.2 Housing Type; 4.3 Housing in and near the Downtown Regional Center; and 4.4 Fair and Affordable Housing, to reflect the data and findings from the most recent Housing Needs Analysis which will be included in Volume II: Background and Supporting Documents. These sections include references to the 2014 Housing Survey and other data and trends that are now out of date. The Housing Needs Analysis identifies less of a need for single detached homes and relies more on middle housing and multi-dwelling housing to meet future housing

needs. The proposed text also includes updated information on other housing needs, such as anti-displacement, affordable housing, and the need to serve specific populations such as multigenerational households, people with disabilities, and people experiencing homelessness. The text and policies in this chapter are updated accordingly.

**Policy f)** Strive to meet the city’s future housing demand within city limits, while coordinating with Washington County and Metro to assess future housing needs at a larger geographic scale, especially for single-detached units.

The proposed amendment includes a Housing Needs Analysis Report that includes an assessment of future housing needs using Metro population growth forecasts. Appendix C of the Housing Needs Analysis Report, Projected Future Housing Need, states that between 2022 and 2042, there will be a projected growth of 9,887 households. Appendix F, the Buildable Lands Inventory, reports that there is residential capacity in Beaverton for 14,987 more units, including a mix of multi-dwelling housing, single-detached housing, and middle housing. This is sufficient for meeting future housing needs. Many of these units will come from South Cooper Mountain and Cooper Mountain, but there will be new development and redevelopment in the rest of the city as well.

In addition to identifying the number of units needed, the Housing Needs Analysis describes the need for housing that serves different populations, especially those with historically limited access to housing and groups that have been historically excluded in housing and land use conversations. The HNA aimed to understand housing needs of all residents based on diverse lived experiences and living situations to inform what action is needed to address identified housing needs, as described in Appendix B, Current Housing Needs.

The proposed amendment also updates Policy f to replace “demand” with “need” and remove “especially for single-detached units” to better reflect the findings of the Housing Needs Analysis, which describes less of a need for single-detached homes. As described on page 2 of the Housing Needs Analysis Report, the city is focusing on meeting housing needs, not "wants" as suggested by the word "demand." These updates are consistent with Policy f’s direction to strive to meet the city’s future housing needs as it is identified in the 2023 Housing Needs Analysis.

**Goal 4.2.1 Provide a variety of housing types that meet the needs and preferences of residents**

**Policy a)** Ensure that sufficient land is appropriately zoned to meet a full range of housing needs, including an adequate amount of single-detached housing to meet projected demand.

Appendix C of the Housing Needs Analysis Report, Projected Future Housing Need, states that between 2022 and 2042, there will be a projected growth of 9,887

households. Appendix F, the Buildable Lands Inventory, reports that there is residential capacity in Beaverton for 14,987 more units and is sufficient for meeting future housing needs for a range of housing types including multi-dwelling housing, single-detached housing, and middle housing.

The proposed amendment to Policy a removes the text, “including an adequate amount of single-detached housing to meet projected demand” to better reflect the findings of the Housing Needs Analysis (HNA), which does not encourage single-detached homes over other housing types. Page 6 of the HNA states that a smaller share of single-detached homes is anticipated to be needed in the future.

**Policy b)** Develop partnerships and programs and dedicate funding to expand ownership opportunities across income ranges, including the preservation of the city’s supply of moderately priced single-detached homes

The proposed amendment to Policy b replaces the text, “the preservation of the city’s supply of moderately priced single-detached homes” with “middle housing types.” The 2023 HNA states that a smaller share of single-detached homes is anticipated to be needed in the future and calls for increased development of ‘middle housing’ types.’ Ownership opportunities can include an array of housing types including townhomes, condos, and plexes.

**Policy d)** Incentivize the development of housing types that are needed but not currently being provided in adequate numbers by market forces, such as single level detached homes and larger multi-dwelling rental units.

The proposed amendment to Policy d replaces the text, “single level detached homes” with “multigenerational housing, accessible housing” to reflect the findings in the most recent HNA. Single-level detached homes are not identified in the HNA as a housing type not being provided by market forces. Multigenerational housing and accessible housing are called out as needed housing types, as described in Appendix C, Projected Future Housing Need.

**Policy e)** Support older residents’ ability to age in place through targeted investments that make existing housing more age-friendly and accessible and contribute to neighborhood stabilization.

The proposed amendment to Policy e adds people with disabilities as a group that should be supported through this policy. Appendix C, Projected Future Housing Need, identifies accessible housing as a needed housing type for both people with disabilities and the aging population.

**Goal 4.5.1: Ensure that Beaverton continues to be one of the most livable communities in the region**

**Policy d)** Engage the community in a continuing dialogue about the city’s anticipated population growth, limited land supply, and current housing trends.

As described in Exhibit C, Public Engagement Summary, and under findings for Goal 1, extensive community engagement was done related to the Housing Needs Analysis, which included discussion of the city’s anticipated population growth, limited land supply, and current housing trends. A state law requires that Beaverton conduct a Housing Needs Analysis every six years, which means there will be continuing dialogue and engagement with the community on this topic on a regular basis.

**Policy j)** Review and reconsider minimum parking standards for new multi-dwelling development.

The proposed amendment removes Policy j because minimum parking requirements will be removed citywide with the adoption of the Parking Policy and Code Project to comply with the State’s Climate-Friendly and Equitable Communities Rules. This will remove barriers to providing needed housing, including new multi-dwelling development and is consistent with the goal for Beaverton to continue to be one of the most livable communities in the region.

Therefore, staff find that the proposed amendment is consistent and compatible with the Comprehensive Plan.

**Conclusion:** Therefore, staff find that the proposed amendment is consistent with Section 1.5.1.

## Metro Urban Growth Management Functional Plan

### Title 1: Housing Capacity (Sections 3.07.110 – 3.07.120)

Title 1 requires a city or county maintain or increase its housing capacity (except as provided in section 3.07.120) per the Regional Framework Plan which calls for a compact urban form and a "fair share" approach to meeting housing needs.

#### FINDING

The proposed amendment does not include changes to minimum or maximum density requirements. The proposed amendment includes an updated Housing Needs Analysis Report and updates to housing policies in Volume I of the Comprehensive Plan to guide future decisions that involve increasing housing capacity and meeting future housing needs.

**Conclusion:** Therefore, staff find that the proposed amendment is consistent with Title 1 of the Metro Urban Growth Management Functional Plan.

## **Title 7: Housing Choice (Sections 3.07.710 – 3.07.750)**

Title 7 implements policies of the Regional Framework Plan regarding establishment of voluntary affordable housing production goals to be adopted by local governments, and assistance from them on reports on progress toward increasing the affordable housing supply.

Section 3.07.730, Requirements for Comprehensive Plan and Implementing Ordinance Changes, states that cities and counties within the Metro region shall ensure that their comprehensive plans and implementing ordinances:

- (a) Include strategies to ensure a diverse range of housing types within their jurisdictional boundaries.
- (b) Include in their plans actions and implementation measures designed to maintain the existing supply of affordable housing as well as increase the opportunities for new dispersed affordable housing within their boundaries.
- (c) Include plan policies, actions, and implementation measures aimed at increasing opportunities for households of all income levels to live within their individual jurisdictions in affordable housing.

### **FINDING**

The proposed amendment includes an updated Housing Needs Analysis Report and updates to housing policies in Volume I of the Comprehensive Plan aimed to ensure housing needs are met, including increasing housing supply and increasing housing opportunities for households of all income levels. The policies and proposed changes under Comprehensive Plan Section 4.2 Housing Type, Goal 4.2.1, support the development of a variety of housing types to serve all residents.

**Conclusion:** Therefore, staff find that the proposed amendment is consistent with Title 7 of the Metro Urban Growth Management Functional Plan.

## **Title 8: Compliance Procedures (Sections 3.07.810 – 3.07.870)**

Title 8 ensures all cities and counties are fairly and equitably held to the same standards and that the Metro 2040 Growth Concept is implemented and sets out compliance procedures and establishes a process for time extensions and exemptions to Metro Code requirements. Section 3.07.820 Review by the Chief Operating Officer, the Functional Plan states that: “(a) A city or county proposing an amendment to a comprehensive plan or land use regulation shall submit the proposed amendment to the COO at least 35 days prior to the first evidentiary hearing on the amendment. The COO may request, and if so the city or county shall submit, an analysis of compliance of the amendment with the functional plan. If the COO submits comments on the proposed amendment to the city or county, the comment shall include analysis and conclusions on compliance and a recommendation with specific revisions to the proposed amendment, if

any, that would bring it into compliance with the functional plan. The COO shall send a copy of comment to those persons who have requested a copy.”

## FINDING

The city provided notice to Metro on June 14, 2023, meeting the requirement to provide notice at least 35 days prior to the first evidentiary hearing on the amendment. The city received no comments from Metro.

**Conclusion:** Therefore, staff finds the proposed amendment is consistent with Title 8 of the Metro Urban Growth Management Functional Plan.

# Metro Regional Functional Transportation Plan

## Title 5: Amendment of Comprehensive Plans

Section 3.08.510: Amendments of City and County Comprehensive and Transportation System Plans says, “A. When a city or county proposes to amend its comprehensive plan or its components, it shall consider the strategies in subsection 3.08.220A as part of the analysis required by OAR 660-012-0060.”

## FINDING

The proposed Comprehensive Plan amendment will not significantly affect an existing or planned transportation facility. The proposed amendment includes adding an updated Housing Needs Analysis Report to Volume II of the Comprehensive Plan and updates to housing policies in Volume I of the Comprehensive Plan aimed to ensure housing needs are met. The proposed amendment will not change the functional classification of an existing or planned transportation facility, change standards implementing a functional classification system, nor result in any effects that are listed in OAR 660-012-0060(1)(c)(A) through (C).

**Conclusion:** Therefore, staff finds the proposed amendment is consistent with Title 5 of the Metro Regional Functional Transportation Plan.

# Statewide Planning Goals

## Goal 1: Citizen Involvement

**Goal text:** To develop a citizen involvement program that insures the opportunity for citizens to be involved in all phases of the planning process.

## FINDING

The proposed amendment is subject to the public notice requirements of the Comprehensive Plan Section 1.4.1. The procedures outlined in Comprehensive Plan Section 1.4.1 allow for proper notice and public comment opportunities on the proposed Comprehensive Plan amendment as required by this Statewide Planning Goal. Beaverton's Comprehensive Plan procedures have been acknowledged as consistent with Statewide Planning Goal 1. These Comprehensive Plan procedures were followed, as described above. In addition, the staff report was published at least seven days before the initial Planning Commission hearing. At the public hearing, the Planning Commission will consider written comments and oral testimony before making a recommendation to the City Council.

As described in Exhibit C, Public Engagement Summary, staff also conducted public engagement and provided opportunities for community members to be involved in all phases of the planning process. Engagement activities included:

- Creation of a project website with information on engagement opportunities and a project notification list so people can subscribe to project updates
- Meetings with the Housing Technical Advisory Group (HTAG), the Beaverton Committee for Community Involvement (BCCI), the Urban Renewal Advisory Committee, the Beaverton Committee on Aging, the Beaverton Inclusive Housing Cohort and Unite Oregon
- Interviews with representatives from Boys and Girls Aid, HomePlate Youth Services, Second Home, Salvation Army, and Housing Supportive Services Network
- In-person tabling and outreach including City of Beaverton Library tabling, Beaverton Night Market, Concert in the Park, Tianquitzli Anahuaca Cultural Market, Central Beaverton business and community partner flyering
- Virtual community event hosted in partnership with Unite Oregon
- Focus groups with youth, people with disabilities, veterans and seniors
- Articles in the Your City citywide newsletter
- Emails to the project notification list and various stakeholder groups and organizations
- Information in the Neighborhood Association Committee (NAC) and Cultural Inclusion newsletters
- Online survey
- Planning Commission work sessions on January 18, 2023, April 12, 2023, and June 14, 2023
- City Council work sessions on February 21, 2023, and April 18, 2023
- Added functionality to the project website to allow public comments to be submitted online.

**Conclusion:** Therefore, staff finds that the city has provided adequate notice and opportunity for public involvement consistent with Goal 1.

## Goal 2: Land Use Planning

**Goal text:** To establish a land use planning process and policy framework as a basis for all decision and actions related to use of land and to assure an adequate factual base for such decisions and actions.

### FINDING

Consistent with Statewide Planning Goal 2, the City of Beaverton maintains an adopted Comprehensive Plan with a Land Use Element. Chapter 3 of the Beaverton Comprehensive Plan outlines goals and policies for land management within the City. The above narrative demonstrates how the proposed amendment is consistent with the applicable goals and policies of the Land Use Element in Beaverton's Comprehensive Plan.

**Conclusion:** Therefore, staff finds the proposed amendment is consistent with Statewide Planning Goal 2.

## Goal 10: Housing

**Goal text:** Buildable lands for residential use shall be inventoried and plans shall encourage the availability of adequate numbers of needed housing units at price ranges and rent levels which are commensurate with the financial capabilities of Oregon households and allow for flexibility of housing location, type and density.

### FINDING

The proposed amendment includes adding an updated Housing Needs Analysis (HNA) Report to Volume II of the Comprehensive Plan and related updates to text and policies in Chapters 3 and 4 in Volume I of the Comprehensive Plan. The last Housing Needs Analysis was completed in 2015. The 2023 HNA includes an updated Housing Needs Projection and Buildable Lands Inventory and demonstrates a need for all housing types in the 20-year period ending in 2042. This included the Cooper Mountain Community Plan Area

Appendix C of the HNA, Projected Future Housing Need, states that there will be a projected growth of 9,887 households in the 20-year period. Appendix F, the Buildable Lands Inventory, reports that there is residential capacity in Beaverton for 14,987 more units, including a mix of multi-dwelling housing, single-detached housing, and middle housing, which is sufficient for meeting future housing needs. See tables below for the breakdown of housing units and types projected to be needed and the summary of residential capacity.



**Table 1. Estimate of 20-Year Housing (2042)**

Unit Type	Middle Housing					Manuf. home	Total Units
	Single-Detached	Single-Attached	Duplex	3- or 4-plex	5+ Units		
<b>Totals</b>	2,692	1,609	727	1,214	3,215	429	9,887
<b>Percentage</b>	27.2%	16.3%	7.3%	12.3%	32.5%	4.3%	100%

Source: 2023 Housing Needs Analysis Report, Appendix C: Projected Future Housing Needs, Figure 2.5.

**Table 2. Summary of Residential Capacity**

Source	Unit Total	Notes
Residential Land	4,556	Mix of single-detached, middle housing, and multi-dwelling units
Mixed-Use Land	1,245	Likely predominantly middle housing or multi-dwelling units
Middle Housing Infill	802	Middle housing units
South Cooper Mountain	3,384	Mix of single-detached, middle housing, and multi-dwelling units
Cooper Mountain Community Plan Area	5,000	Mix of single-detached, middle housing, and multi-dwelling units
<b>Total</b>	<b>14,987</b>	

Source: 2023 Housing Needs Analysis Report, Appendix F: Buildable Lands Inventory, Table 13.

In addition to inventories of buildable lands, Goal 10 states, “housing elements of a comprehensive plan should, at a minimum, include: (1) a comparison of the distribution of the existing population by income with the distribution of available housing units by cost; (2) a determination of vacancy rates, both overall and at varying rent ranges and cost levels; (3) a determination of expected housing demand at varying rent ranges and cost levels; (4) allowance for a variety of densities and types of residences in each community; and (5) an inventory of sound housing in urban areas including units capable of being rehabilitated.”

The proposed amendment addresses these guidelines in various sections of the HNA Report:

- Appendix B of the HNA Report, Current Housing Needs: Equitable Housing Needs Estimate, includes a comparison of the distribution of the existing population by income with the distribution of available housing units by cost as well as a determination of vacancy rates overall and at varying rent ranges and cost levels.
- Appendix C of the HNA Report includes the determination of expected housing demand at varying rent ranges and cost levels.

- Appendix F of the HNA Report includes the allowance for a variety of densities and types of residences in each community and an inventory of sound housing in urban areas including units capable of being rehabilitated.

**Conclusion:** Therefore, staff finds the proposed amendment is consistent with Statewide Planning Goal 10.

## Goal 14: Urbanization

**Goal text:** To provide for an orderly and efficient transition from rural to urban land use, to accommodate urban population and urban employment inside urban growth boundaries, to ensure efficient use of land, and to provide for livable communities.

### FINDING

The proposed amendment includes a Housing Needs Analysis Report with an updated Buildable Lands Inventory (Appendix F). The proposed amendment does not include any changes to urban growth boundaries. According to the Buildable Lands Inventory, there is sufficient residential land to meet future housing needs to accommodate future population growth within the urban growth boundary, including land currently in the Beaverton city limits and in Cooper Mountain, a 1,200-acre area added to the urban growth boundary in 2018 that has not yet been annexed. By concentrating future housing and population growth in the Urban Growth Boundary, this will ensure efficient use of land and that Beaverton continues to be a livable community.

**Conclusion:** Therefore, staff finds the proposed amendment is consistent with Statewide Planning Goal 14.

## Oregon Administrative Rules

### OAR 660-007-0030 New Construction Mix

OAR 660-007-0030(1) states that jurisdictions other than small developed cities must either designate sufficient buildable land to provide the opportunity for at least 50 percent of new residential units to be attached single family housing or multiple family housing or justify an alternative percentage based on changing circumstances. Factors to be considered in justifying an alternate percentage shall include, but need not be limited to:

- (a) Metro forecasts of dwelling units by type;
- (b) Changes in household structure, size, or composition by age;
- (c) Changes in economic factors impacting demand for single family versus multiple family units; and
- (d) Changes in price ranges and rent levels relative to income levels.

## FINDING

The proposed amendment includes a Housing Needs Analysis Report with an updated Buildable Lands Inventory. Appendix C of the HNA, Projected Future Housing Need, states that there will be a projected growth of 9,887 households in the 20-year period. Appendix F, the Buildable Lands Inventory, reports that there is residential capacity in Beaverton for 14,987 more units, which is sufficient for meeting future housing needs. Of the 14,987 units, the Buildable Lands Inventory shows capacity for 5,122 units in the Medium-Density zoning category, which typically includes attached single family housing, manufactured homes, and plexes with 2-4 units. The Buildable Lands Inventory also shows capacity for 4,082 units in the High-Density zoning category, which typically includes multi-dwelling housing. Together, this accounts for 9,204 units, or 61.4% of new residential units. The Low-Density zoning category can also accommodate townhomes and plexes, so this percentage could be even higher. This far exceeds the 50 percent required. The proposed amendment to the Comprehensive Plan, including the addition of the most recent Housing Needs Analysis Report is consistent with OAR 660-007-030.

**Conclusion:** Therefore, staff finds the proposed amendment is consistent with OAR 660-007-0030.

## OAR 660-007-0033 Consideration of Other Housing Types

OAR 660-007-0033 states that each local government shall consider the needs for manufactured housing and government assisted housing within the Portland Metropolitan UGB in arriving at an allocation of housing types.

## FINDING

The proposed amendment includes an updated Housing Needs Analysis Report which considers the needs for all housing types, including manufactured housing and government assisted housing within the Portland Metropolitan UGB. In the HNA, Appendix C, Projected Future Housing Needs, forecasts future housing needs over the 20-year planning period (2022-2042). Figure 2.5 in Appendix C shows an estimated need for 429 more manufactured homes, which account for 4.3% of total units needed by 2042. In addition to manufactured housing, Appendix C also describes government-subsidized housing as important for fulfilling housing needs at the very lowest income levels. Figure 2.4 in Appendix C estimates that 33% of new units should serve residents who earn less than 80% Area Median Income.

**Conclusion:** Therefore, staff finds the proposed amendment is consistent with OAR 660-007-0033.

## OAR 660-007-0035 Minimum Residential Density Allocation for New Construction

OAR 660-007-035 requires the City of Beaverton to provide for an overall density of 10 or more dwelling units per net buildable acre.

### FINDING

The proposed amendment adds an updated Housing Needs Analysis Report that includes a Buildable Lands Inventory (Appendix F) to the Comprehensive Plan. In Appendix F, Table 2 shows 498.9 acres of residential land that are developable within the study area, which consists of the area within city limits plus the Cooper Mountain Community Plan area. Table 13 in Appendix F shows capacity for 14,987 units within the study area. Dividing the units by the acres available results in 30 units per net buildable acre. This far exceeds the 10 units per net buildable acre minimum.

**Conclusion:** Therefore, staff finds the proposed amendment is consistent with OAR 660-007-0035.

## OAR 660-007-0045 Computation of Buildable Lands

OAR 660-007-0045 requires that local buildable lands inventories document the amount of buildable land in each residential plan designation. The buildable land inventory at each jurisdiction's choice shall either be based on land in a residential plan/zone designation within the jurisdiction at the time of periodic review or based on the jurisdiction BLI at the time of acknowledgment as updated. Each jurisdiction must include in its computations all plan and/or zone changes involving residential land which that jurisdiction made since acknowledgment.

### FINDING

The proposed amendment adds an updated Housing Needs Analysis Report that includes a Buildable Lands Inventory (Appendix F) to the Comprehensive Plan. Appendix F includes the number of buildable acres of residential land by zoning designation, documented in the tables below.

**Table 3. Net Buildable Acres and Estimated Units of Residential Land by Zoning Designation**

Zone	Vacant and Partially Vacant Taxlots	Net Buildable Acres	Estimated Density	Estimated Units
MR	23	28.3	35	990
RMA	116	29.0	17	493
RMB	470	89.5	10	895
RMC	1,630	301.3	7	2,172
County Designation	2	1.5	4	6
Total	2,241	449.6	-	4,556

Source: 2023 Housing Needs Analysis Report, Appendix F: Buildable Lands Inventory, Table 8.

**Table 4. Net Buildable Acres and Estimated Units of Mixed Use Land by Zoning Designation**

Zone	Vacant and Partially Vacant Taxlots	Net Buildable Acres (Residential)	Net Buildable Acres (Employment)	Estimated Residential Density	Estimated Residential Units
CS	14	2.4	10.2	35	357
GC	1	0.1	0.2	35	7
NS	5	0.2	1.2	35	42
OI-WS	2	0.0	0.1	35	3
RC-BC	24	5.2	5.2	60	312
RC-DT	1	0.0	0.1	30	3
RC-E	3	0.0	0.1	12	1
RC-MU	6	1.4	1.4	43	60
RC-OT	16	2.2	0.6	24	14
SC-HDR	15	3.0	0.7	24	16
SC-MU	18	37.1	9.3	24	223
SC-S	6	29.5	7.4	24	177
TC-HDR	6	4.3	1.1	24	26
TC-MU	1	0.4	0.2	24	4
TOTAL	118	85.8	37.9	-	1,245

Source: 2023 Housing Needs Analysis Report, Appendix F: Buildable Lands Inventory, Table 9.

**Conclusion:** Therefore, staff finds the proposed amendment is consistent with OAR 660-007-0045.

## OAR 660-008-0010 Allocation of Buildable Land

OAR 660-008-0010 says, “Sufficient buildable land shall be designated on the comprehensive plan map to satisfy housing needs by type and density range as determined in the housing needs projection. The local buildable lands inventory must document the amount of buildable land in each residential plan designation.”

### FINDING

The proposed amendment includes an updated Housing Needs Analysis Report that consists of a housing needs projection, buildable lands inventory, and comparison of housing need and land. As described above, Appendix F in the HNA, the Buildable Lands Inventory, includes the number of buildable acres of residential land by zoning designation. Appendix D, Comparison of Housing Need and Land, compares the projected 20-year housing needs (Appendix C, Projected Future Housing Need) with the buildable lands inventory. The estimated total capacity of 14,987 units is much higher than the forecasted growth of 9,887 new households over the next 20 years and is



adoption of a Housing Capacity Analysis in a given year is December 31st. A city will be considered to have met its obligation to adopt a Housing Capacity Analysis upon adoption of the Housing Capacity Analysis by ordinance.

Upon adoption of a Housing Capacity Analysis, the deadline for a subsequent Housing Capacity Analysis for Beaverton is 6 years subsequent. 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 197.296(2)(a)(B) or (10)(c)(B), the city must adopt a Housing Capacity Analysis within two years of its qualification or the interval of six years subsequent, whichever is the longer period.

## FINDING

The Land Conservation and Development Commission adopted a schedule for cities over 10,000 people to update their Housing Needs Analysis which lists Beaverton's deadline as 2023. The proposed amendment includes an updated Housing Needs Analysis Report (Housing Capacity Analysis), which is scheduled to be considered for adoption on September 5, 2023. This is before the December 31<sup>st</sup> deadline. The scheduled adoption date takes place within the required time frame. The Housing Needs Analysis includes a Buildable Lands Inventory, which demonstrates sufficient buildable lands to meet future population growth and housing needs, as described in earlier sections.

**Conclusion:** Therefore, staff finds the proposed amendment is consistent with OAR 660-008-0045.

## Oregon Revised Statutes

### **ORS 197.296 Analysis of housing capacity and needed housing by Metro, cities outside of Metro and smaller cities; accommodation of housing need.**

ORS 197.296(3) states, "a local government shall: (a) Inventory the supply of buildable lands within the urban growth boundary and determine the housing capacity of the buildable lands; and (b) Conduct an analysis of existing and projected housing need by type and density range, in accordance with all factors under ORS 197.303 and statewide planning goals and rules relating to housing, to determine the number of units and amount of land needed for each needed housing type for the next 20 years."

## FINDING

The proposed amendment includes an updated Housing Needs Analysis Report which consists of a housing needs projection and a buildable lands inventory. Appendix F of the HNA, the Buildable Lands Inventory, determined there is residential capacity for 14,987, including a mix of housing types and densities, which is sufficient for

accommodating projected population growth. Appendix B, Current Housing Needs, outlined current housing needs in Beaverton and estimated housing needs based on local demographic and household trends. Appendix C, Projected Future Housing Needs, forecasted future housing needs over a 20-year period by type and density range in accordance with ORS 197.303 and statewide planning goals and rules relating to housing, as described above.

**Conclusion:** Therefore, staff finds the proposed amendment is consistent with ORS 197.296.

## **ORS 197.297 Analysis of housing capacity and needed housing in Metro cities.**

ORS 197.297 requires that at least once every six years, by a date scheduled by the Land Conservation and Development Commission, a city that is within a metropolitan service district and has a population greater than 10,000 shall:

- (a) Inventory the supply of buildable lands within the city and determine the housing capacity of the buildable lands; and
- (b) Conduct an analysis of the city's existing and projected needed housing under statewide planning goals and rules related to housing by type, mix, affordability and density range to determine the number of units and amount of land needed for each needed housing type for the next 20 years.

ORS 197.297(2) requires that the housing capacity and needed housing analysis be adopted as part of the city's comprehensive plan no later than one year after completion of the needed housing analysis.

ORS 197.297(3) states that if the housing capacity and needed housing analysis demonstrates a housing need, the city shall amend its comprehensive plan or land use regulations to include new measures that demonstrably increase the likelihood that development of needed housing will occur for the type, mix, affordability and densities sufficient to accommodate needed housing for the next 20 years.

### **FINDING**

The proposed amendment includes an updated Housing Needs Analysis Report which includes a buildable lands inventory (Appendix F: Buildable Lands Inventory), analysis of existing needed housing (Appendix B: Current Housing Needs), and analysis of projected needed housing (Appendix C: Projected Future Housing Needs). In addition to adding the updated Housing Needs Analysis Report to Volume II of the Comprehensive Plan, the proposed amendment includes updates to text and policies in Volume I of the Comprehensive Plan to increase the likelihood that development of needed housing to



accommodate projected need for the next 20 years. These changes are reflected in Chapter 4: Housing Element.

The Housing Needs Analysis report was completed and sent to the State Department of Land Conservation and Development on May 23, 2023. The proposed amendment to Beaverton's Comprehensive Plan is scheduled to be considered for adoption on September 5, 2023. This is less than one year after completion of the needed housing analysis. The Land Conservation and Development Commission adopted a schedule for cities over 10,000 people to update their Housing Needs Analysis which lists Beaverton's deadline as 2023. The scheduled adoption date takes place within the required time frame.

**Conclusion:** Therefore, staff finds the proposed amendment is consistent with ORS 197.297.

## CONCLUSION & RECOMMENDATION

Based on the facts and findings presented, staff offers the following recommendation for the conduct of the public hearing for CPTA42023-00245:

- A. Conduct the public hearing and receive all public testimony relating to the proposal.
- B. Consider the public testimony and the facts and findings presented in the July 12, 2023, staff report, deliberate on policy issues and other issues identified by the Commission or the public.
- C. Recommend **APPROVAL** of text amendment application Comprehensive Plan Text Amendment to City Council with proposed language as written in Exhibit A and Exhibit B.