

**ORDINANCE NO. 1627**

**AN ORDINANCE ADOPTING THE HOUSING NEEDS ANALYSIS AS PART OF THE CITY OF CANBY COMPREHENSIVE PLAN (TA 23-03/ CPA 24-01)**

**WHEREAS**, the City Council accepted the Housing Needs Analysis (HNA) on July 17, 2024 which needs to be formally adopted into the Canby Comprehensive Plan;

**WHEREAS**, there is a state requirement that the HNA be adopted as part of the City's comprehensive plan;


**WHEREAS**, the planning commission recommended approval of the HNA on June 10, 2024; and

**WHEREAS**, a staff report with appropriate findings have been prepared showing consistency of the HNA comprehensive plan text amendment with the City Municipal Code and statewide planning goals.

**THEREFORE, THE CITY OF CANBY, OREGON, ORDAINS AS FOLLOWS:**

**Section 1.** The City of Canby City Council hereby adopts the HNA as a text amendment to the Canby Comprehensive Plan. A copy of the HNA is attached to this ordinance (City of Canby Housing Needs Analysis, Final Report, June 18, 2024) as Exhibit A and is incorporated by reference.


**SUBMITTED** to the Canby City Council and read the first time at a regular meeting therefore on Wednesday, July 17, 2024, ordered posted as required by the Canby City Charter; and scheduled for second reading on Wednesday, August 7, 2024, commencing at the hour of 7:00 PM in the Council Chambers located at 222 NE 2<sup>nd</sup> Avenue, 1<sup>st</sup> Floor Canby, Oregon.

  
\_\_\_\_\_  
Maya Benham, CMC  
City Recorder

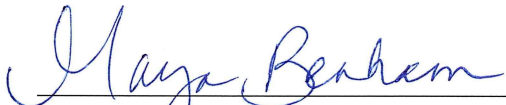
**PASSED** on second and final reading by the Canby City Council at a regular meeting thereof on the 7<sup>th</sup> day of August 2024, by the following vote:

YEAS 5

NAYS 0

  
\_\_\_\_\_  
Brian Hodson  
Mayor

ATTEST:

  
\_\_\_\_\_  
Maya Benham, CMC  
City Recorder

**AFFIDAVIT OF POSTING**

STATE OF OREGON     )  
                                  )  
County of Clackamas     )     ss:  
                                  )  
CITY OF CANBY         )

I, Maya Benham, being first duly sworn, depose and say that I am the City Recorder for the City of Canby, Clackamas County, Oregon, a City duly incorporated under and by virtue of the laws of the State of Oregon.

That on the 17th day of July, 2024, the Council for said City of Canby held a Regular City Council Meeting, at which meeting Ordinance No. 1627 was read for the first time and passed by the vote of said Council and then and there ordered posted in at least three (3) public and conspicuous places in said City for a period of five (5) days prior to the second reading and final vote on said Ordinance, as provided in Section 2 of Chapter 8 of the Charter of the City of Canby, and

Thereafter, on the 18th day of July, 2024, I posted said Ordinance in the following three (3) conspicuous places, all within the said City of Canby, to wit:

- 1.     Canby Civic Building
- 2.     Canby Post Office
- 3.     City of Canby Web Page

That since said posting on the date aforesaid, the said Ordinance will remain posted in the said three (3) public and very conspicuous places for the period of more than five (5) days and until the very 7<sup>th</sup> day of August, 2024.

*Maya Benham*  
\_\_\_\_\_  
Maya Benham, CMC  
City Recorder

Subscribed and sworn to before me this 19 day of June, 2024.



*Emily Lela Sasse*  
\_\_\_\_\_  
Notary Public for Oregon  
My Commission Expires: 12/12/26

**Exhibit A**

# City of Canby Housing Needs Analysis

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**Final Report**

**June 18, 2024**

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City of  
**Canby**

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# Acknowledgements

This project is funded by Oregon general fund dollars through the Department of Land Conservation and Development. The contents of this document do not necessarily reflect the views or policies of the State of Oregon.

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Traci Hensley, President  
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Jason Padden  
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Daniel Stearns  
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## Table of Contents

Acknowledgements .....	ii
Introduction .....	1
Oregon Regulatory Requirements .....	1
Methodology .....	2
Process .....	2
Report Organization.....	3
Housing Need Projection .....	4
Methodology .....	4
Demographic and Socio-Economics.....	4
Population .....	4
Socio-economic Characteristics .....	5
Housing Inventory and Tenancy .....	7
Housing Market Characteristics.....	8
Housing Needs .....	12
Summary of Future Housing Needs .....	12
Housing Demand by Dwelling Type and Tenancy.....	13
Buildable Land Inventory .....	16
BLI Methodology.....	16
Residential Land Base.....	16
Land Classifications .....	17
Development Constraints.....	18
Buildable Land Inventory Results .....	20
Development in the Construction Pipeline .....	21
Remaining Unconstrained Buildable Residential Land .....	21
Residential Land Need Analysis.....	24

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<b>Housing Need Forecast .....</b>	<b>24</b>
<b>Methodology for Forecasting Residential Land Need .....</b>	<b>24</b>
<b>UGB Sufficiency Analysis .....</b>	<b>26</b>
<b>Findings and Recommendations .....</b>	<b>27</b>
<b>Key Findings.....</b>	<b>27</b>
<b>Housing Strategy Recommendations.....</b>	<b>28</b>



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# Introduction

The Canby Housing Needs Analysis (HNA) is intended to serve as a basis for the City of Canby to document new information regarding the city’s Buildable Land Inventory (BLI), population and housing trends, and development policies aimed at providing adequate land within the urban growth boundary (UGB) to accommodate the next 20 years of population growth.

## Oregon Regulatory Requirements

The passage of the Oregon Land Use Planning Act of 1974 (ORS Chapter 197) established the Land Conservation and Development Commission (LCDC) and the Department of Land Conservation and Development (DLCD). The Act required the Commission to develop and adopt a set of statewide planning goals. Goal 10 addresses housing in Oregon and provides guidelines for local governments to follow in developing their local comprehensive land use plans and implementing policies.

At a minimum, local housing policies must meet the applicable requirements of Goal 10 and the statutes and administrative rules that implement it (ORS 197.295 to 197.314, ORS 197.475 to 197.490, and OAR 600-008).<sup>1</sup> Goal 10 requires incorporated cities to complete an inventory of buildable residential lands. Goal 10 also requires cities to encourage the numbers of housing units in price and rent ranges commensurate with the financial capabilities of its households. Goal 10 defines needed housing types as “all housing on land zoned for residential use or mixed residential and commercial use that is determined to meet the need shown for housing within an UGB at price ranges and rent levels that are affordable to households within the county with a variety of incomes, including but not limited to households with low incomes, very low incomes and extremely low incomes.” ORS 197.303 defines needed housing types:

- (a) Housing that includes, but is not limited to, attached and detached single-family housing and multiple family housing for both owner and renter occupancy.
- (b) Government assisted housing.<sup>2</sup>
- (c) Mobile home or manufactured dwelling parks as provided in ORS 197.475 to 197.490.
- (d) Manufactured homes on individual lots planned and zoned for single-family residential use that are in addition to lots within designated manufactured dwelling subdivisions.
- (e) Housing for farmworkers.

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<sup>1</sup> ORS 197.296 only applies to cities with populations over 25,000.

<sup>2</sup> Government assisted housing can be any housing type listed in ORS 197.303 (a), (c), or (d).



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## Methodology

A recommended approach to conducting a housing needs analysis is described in *Planning for Residential Growth: A Workbook for Oregon's Urban Areas*, the Department of Land Conservation and Development's guidebook on local housing needs studies. As described in the workbook, the specific steps in the housing needs analysis are:

1. Forecast the number of new housing units needed in the next 20 years.
2. Identify relevant national, state, and local demographic and economic trends and factors that may affect the 20-year projection of structure type mix.
3. Describe the demographic characteristics of the population and, if possible, the housing trends that relate to demand for different types of housing.
4. Determine the types of housing that are likely to be affordable to the projected households based on household income.
5. Determine the needed housing mix and density ranges for each plan designation and the average needed net density for all structure types.
6. Document the buildable land inventory within the Canby Urban Growth Boundary by Comprehensive Land Use Plan designation.
7. Prepare policy findings regarding the sufficiency of the Urban Growth Boundary with regard to land that is currently buildable and planned for housing.

## Process

The HNA process was initiated at a kickoff management of City staff and the consultant in January 2022. Project Management Team members continued to meet on regular basis over the course of the project to track progress on key tasks and deadlines, identify unanticipated issues and develop alternative approaches as needed.

A Housing Advisory Committee (HAC) appointed by the City met four times over the course of the project. The HAC reviewed and provided comments on key materials and made recommendations related to housing implementation policies.

- At meeting #1 in March 2022, the HAC discussed the Community Engagement Plan and Housing Needs Projection.
- At meeting #2 in June 2022, the HAC viewed a presentation on the Residential Buildable Land Inventory and Residential Land Need Analysis.
- At meeting #3 in September 2022, the HAC reviewed Housing Policy Options.
- At meeting #4 in January 2023, the HAC reviewed the Draft HNA and land efficiency measures.

All HAC meetings were advertised and open to the public. Additional revisions were made between January 2023 and March 2024 based on comments and correspondence with DLCD. These changes were reviewed by the Canby Planning Commission and City Council.

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## Report Organization

This report provides the technical basis of findings that support proposed housing policy recommendations and subsequent actions that the city will take to update its Comprehensive Plan and Development Code. Each section of this report provides current data, assumptions and results that comprise all findings and conclusions:

**I. Introduction.**

**II. Housing Need Projection:** provides a demographic overview and summary of market trends influencing housing growth in Canby.

**III. Buildable Land Inventory:** identifies vacant, partially vacant and redevelopable residential land within the Canby UGB, and accounts for constraints to get to a final determination of capacity to meet 20-year needs.

**IV. Land Sufficiency Analysis:** this section compares expected land demand to vacant land supply to meet housing mix and densities described in the HNA.

**V. Findings and Recommendations** highlights key findings and housing policy recommendations.

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# Housing Need Projection

## Methodology

The methodology for projecting housing needs within the Canby UGB includes consideration of demographic and socio-economic trends, housing market characteristics and long-range population growth projections. This report and its findings are primarily based on data available as of December 2023.

Regional (Clackamas County) and local (City or UGB) population, households, income and market characteristics are described in this memorandum using data provided by the U.S. Census Bureau (Census and American Community Survey), the U.S. Department of Housing and Urban Development (HUD), Oregon Department of Housing and Community Services (OHCS), Portland State University (PSU) and the City of Canby. Where trends or long-range projections are provided by an identified data source, this analysis includes extrapolations or interpolations of the data to arrive at a base year (2022 estimate) and forecast year (2043 projection).<sup>3</sup> The result of this forecast translates population growth into households and households into housing need by dwelling type, tenancy (owner vs. renter) and affordability level.

## Demographic and Socio-Economics

### Population

The City of Canby population increased to 18,979 people in 2022 (July 1 estimate by PSU). Clackamas County, Oregon’s third largest in terms of population, had an estimated 429,149 year-round residents. Prior to 2010, Canby was growing over twice as fast as the county average. However, during the most recent decade (2010 to 2022) population growth in Canby slowed down as remaining buildable land became less abundant (Exhibit 1).

**Exhibit 1: Population Trends (2000-2022)**

	2000	2010	2020	2022	Annual Growth Rate	
					2000-2010	2010-2022
Clackamas County	338,391	375,992	422,185	429,149	1.06%	1.11%
Canby UGB	13,323	17,097	18,171	18,655	2.53%	0.73%
City of Canby	12,790	15,829	17,210	18,979	2.15%	1.52%

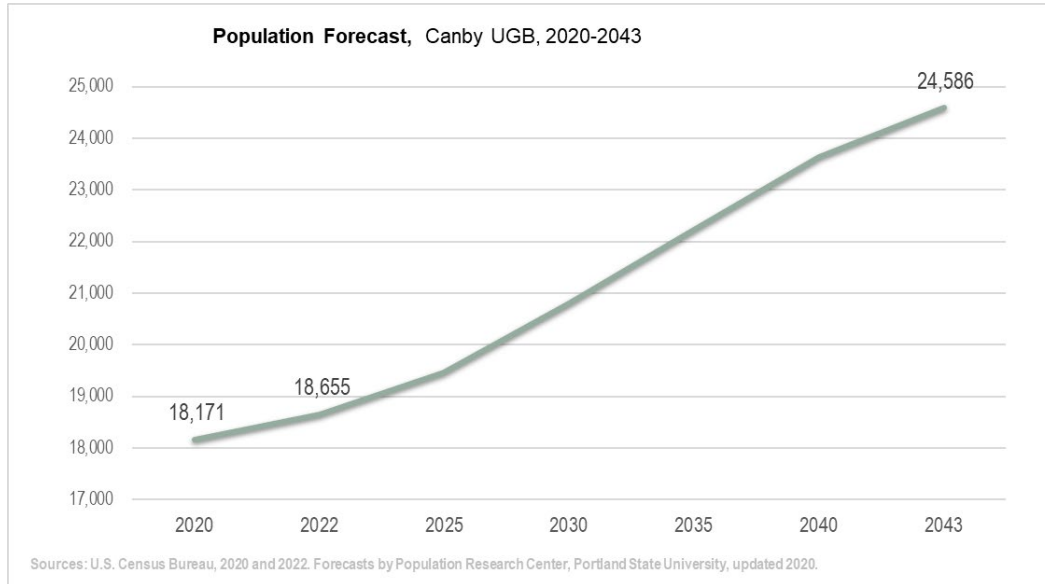
**Sources:** Population Research Center, Portland State University.  
U.S. Census Bureau, PL94-171 redistricting data files.

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<sup>3</sup> The time frame for this analysis assumes a 20-year forecast period between Dec. 31, 2022 and Jan. 1, 2043.

Long-range population forecasts prepared by PSU anticipate that 5,931 residents will be added to the Canby Urban Growth Boundary (UGB) over the next 20 years. This equates to a projected annual average growth rate (CAGR) of 1.3% for the UGB (see Exhibit 2).

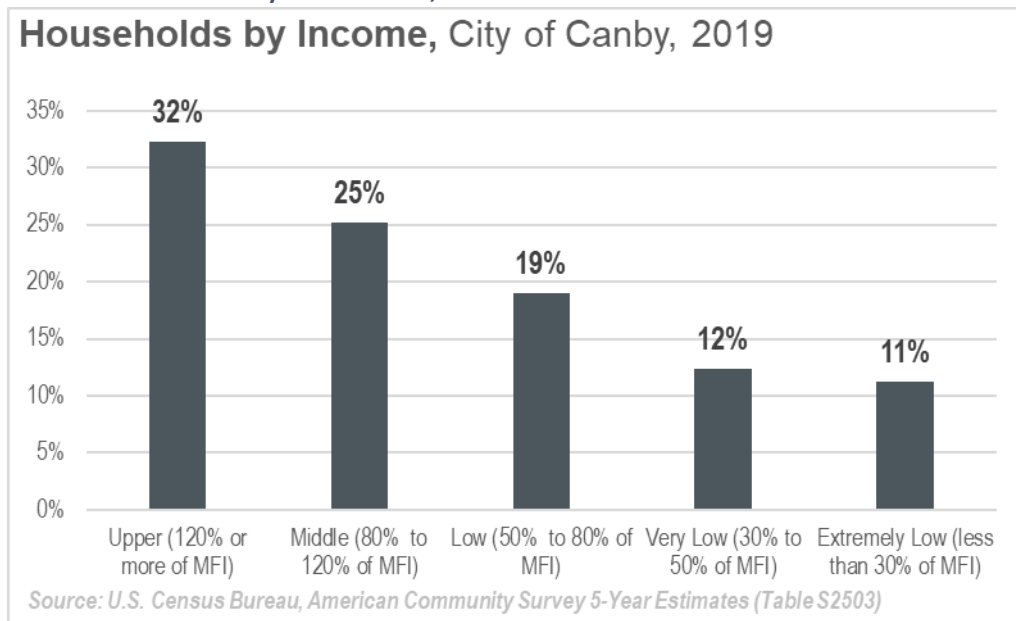
**Exhibit 2: Canby UGB Population Forecast (2020-2043)**



### Socio-economic Characteristics

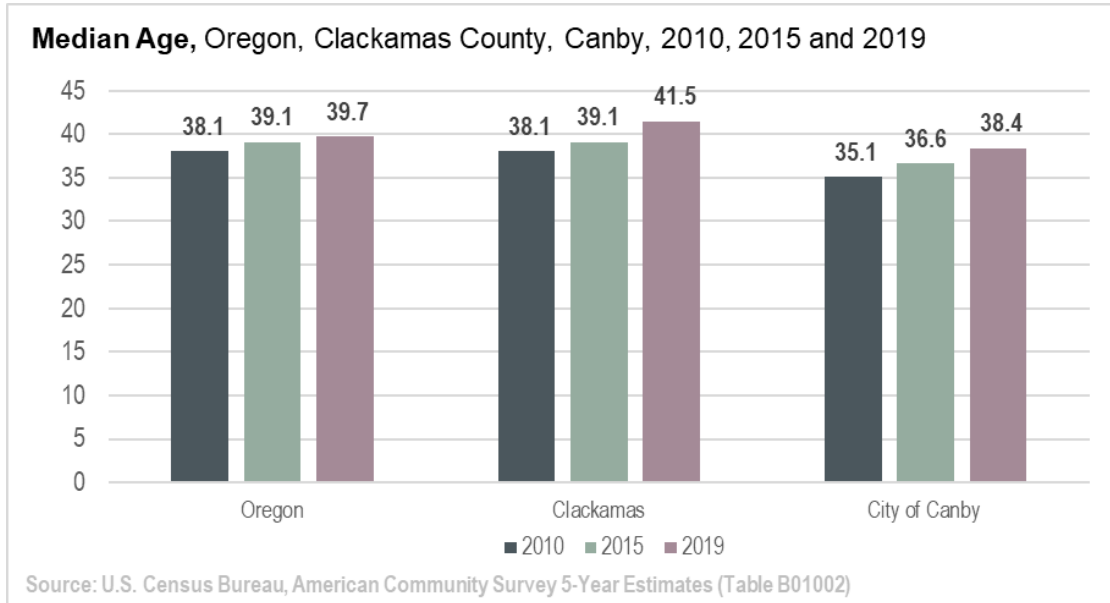
In 2019, the median family income (MFI) in Clackamas County was \$80,484. As shown below in Exhibit 3, nearly one third of the households in Canby earn over 120% of the MFI (\$96,581 or above).

**Exhibit 3: Households by Income Level, 2015-2019**



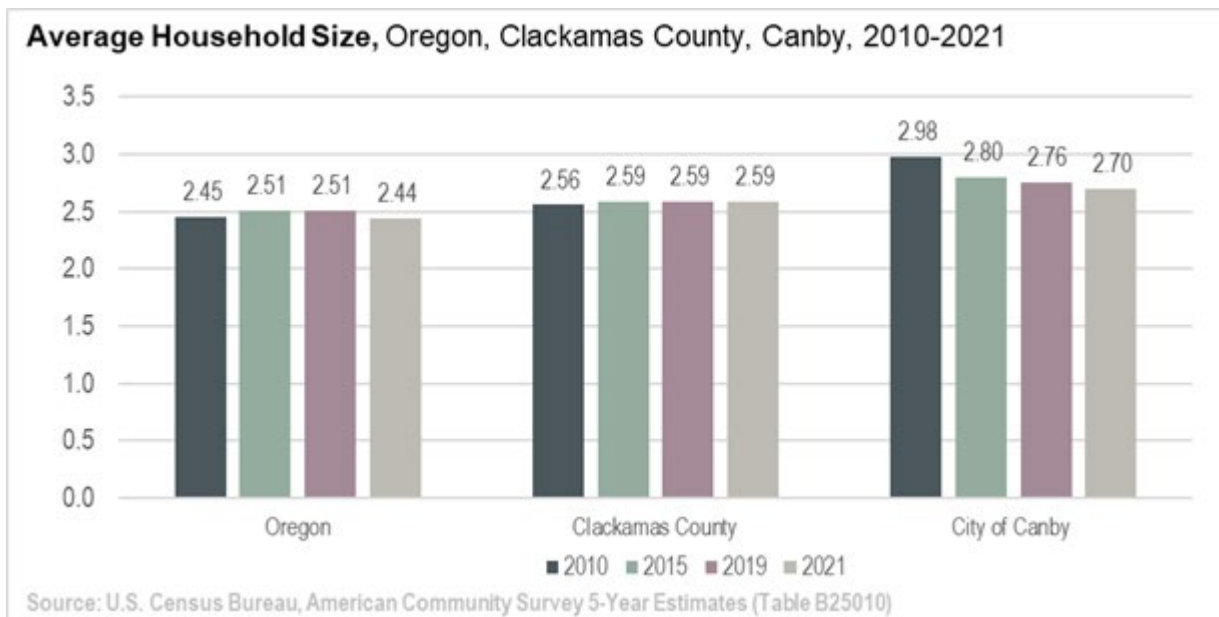
The median age in Canby (38.4) is below the Clackamas County average (41.5) and below the statewide average (39.7) as well (Exhibit 4).

Exhibit 4: Median Age, 2010-2019



Average household size in Canby has decreased slightly over the last two decades, from 2.98 in 2010 to 2.7 in 2021. This is well above the statewide average of 2.44 and above the countywide average of 2.59 (Exhibit 5).

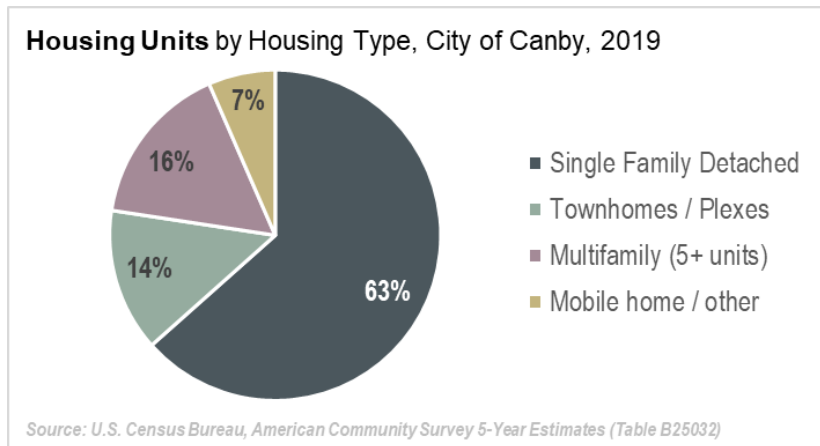
Exhibit 5: City of Canby Average Household Size 2010-2021



## Housing Inventory and Tenancy

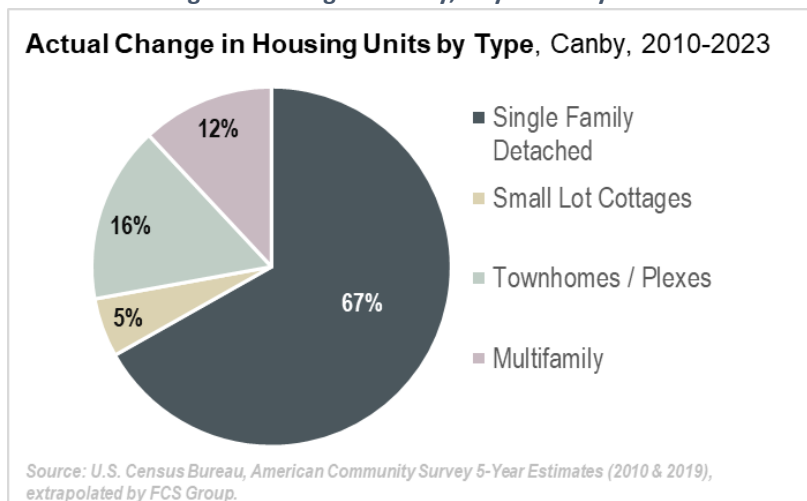
Canby's existing housing inventory and tenancy sheds light on housing conditions and market demand preferences. In 2019, there were 6,608 housing units in Canby of which 6,383 units were classified as occupied and only 225 units were vacant. Like most cities with under 50,000 residents, single-family detached housing is the most prevalent housing type representing 63% of the housing stock. The remaining inventory in Canby includes multi-family (16%), townhomes/plexes (14%), and mobile homes (7%), as shown in Exhibit 6A.

**Exhibit 6A: Existing Housing Inventory, 2019, City of Canby**



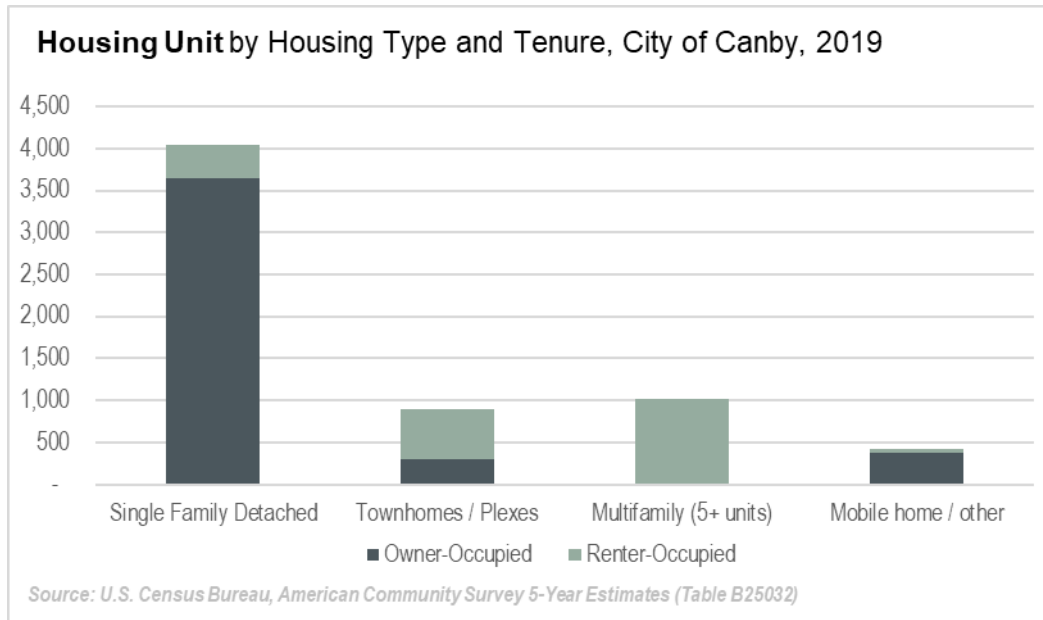
Between 2010 and 2023 the mix of new housing developed in Canby has trended a bit more towards single family detached homes. As indicated in Exhibit 6B, about two-thirds of new housing construction consisted in detached homes, and the remaining one-third was constructed as “middle housing” such as townhomes, duplexes, apartments and manufactured homes. While there has been an increase in the share of single family development, a current “snap shot” of developments in the construction pipeline reveal a trend towards small lot sizes (less than 8,300 net square feet per dwelling) over larger or lot sizes.

**Exhibit 6B: Change in Housing Inventory, City of Canby**



Owner-occupied housing units represent 68% of the occupied housing inventory while renter-occupied units account for the other 32% of the inventory (Exhibit 7). Ownership is most prevalent among single-family detached and manufactured housing types while renters are more likely to favor townhomes, plexes, and multifamily units.

**Exhibit 7: Existing Housing Tenancy, 2019, City of Canby**



## Housing Market Characteristics

To help gauge housing attainability in Canby, local median family income (MFI) levels were evaluated using U.S. Housing and Urban Development (HUD) guidelines. By applying the assumptions shown in Exhibit 8 and 9, based on median family income (MFI) for Clackamas County (\$88,517), HUD guidelines indicate that upper-middle households (with 4 family members) earning 80% of the MFI should be able to afford monthly rents at \$2,656.

**Exhibit 8: Canby Housing Affordability Analysis Assumptions**

Assumptions		
Interest Rate (conventional)	7.0%	
Downpayment	5%	
Mortgage duration (Years)	30	
Income Affordability Target Level %	30%	of median income
Property Taxes	0.0125	% of sales price
Mortgage Insurance	0.0085	% of loan amt.
Home Insurance	0.0029	% of sales price



The rents shown in Exhibit 9 are considered “attainable” if no more than 30% of household income is allocated to housing.

**Exhibit 9: Canby Affordable Housing Analysis: Renters**

Clackamas County Median Family Income Level (2021)*		\$88,517
HUD Qualifying Income Level: Renters	Lower-end	Upper-End
Upper (120% or more of MFI)	\$106,220 or more	
Middle (80% to 120% of MFI)	\$70,814	\$106,220
Low (50% to 80% of MFI)	\$44,259	\$70,814
Very Low (30% to 50% of MFI)	\$26,555	\$44,259
Extremely Low (less than 30% of MFI)	\$26,555 or less	
Attainable Monthly Housing Cost: Renters (@30% of income)	Lower-end	Upper-End
Upper (120% or more of MFI)	\$2,656 or more	
Middle (80% to 120% of MFI)	\$1,770	\$2,656
Low (50% to 80% of MFI)	\$1,106	\$1,770
Very Low (30% to 50% of MFI)	\$664	\$1,106
Extremely Low (less than 30% of MFI)	\$664 or less	

\*Note, this analysis is generally consistent with 2.5-person household size.

\*\* See assumptions provided in supporting table.

Source: analysis by FCS Group using Housing and Urban Development data.

Monthly housing costs are generally higher for homeowners than renters due to added costs associated with insurance and taxes. If 30% of income is allocated to mortgage interest and principal, using the assumptions stated on Exhibits 8 and 10, the expected housing cost for owners at 80% MFI level is \$2,245, which should be sufficient to afford a home priced at \$277,000 (Exhibit 10). Note, this analysis is based on a 5% downpayment. Hence the attainable home price would increase to \$317,000 with a 20% down payment since the homebuyer would bring more cash to closing than with a 5% down payment. The mortgage scenarios shown below assume no existing debt.

**Exhibit 10: Canby Affordable Housing Analysis: Homeowners**

Clackamas County Median Family Income Level (2021)*		\$88,517
HUD Qualifying Income Level:	Lower-end	Upper-End
Upper (120% or more of MFI)	\$106,220 or more	
Middle (80% to 120% of MFI)	\$70,814	\$106,220
Low (50% to 80% of MFI)	\$44,259	\$70,814
Very Low (30% to 50% of MFI)	\$26,555	\$44,259
Extremely Low (less than 30% of MFI)	\$26,555 or less	
Supportable Housing Price: Mortgage Principal & Interest	Lower-end	Upper-End
Upper (120% or more of MFI)	\$415,000 or more	
Middle (80% to 120% of MFI)	\$277,000	\$415,000
Low (50% to 80% of MFI)	\$173,000	\$277,000
Very Low (30% to 50% of MFI)	\$104,000	\$173,000
Extremely Low (less than 30% of MFI)	\$104,000 or less	
Monthly Housing Costs for Owners: PIT & Insurance**	Lower-end	Upper-End
Upper (120% or more of MFI)	\$3,367 or more	
Middle (80% to 120% of MFI)	\$2,245	\$3,367
Low (50% to 80% of MFI)	\$1,403	\$2,245
Very Low (30% to 50% of MFI)	\$842	\$1,403
Extremely Low (less than 30% of MFI)	\$842 or less	

\*Note, this analysis is generally consistent with 2.5-person household size.

\*\* See assumptions provided in supporting table.

Source: analysis by FCS Group using Housing and Urban Development data.

Canby home values increased significantly between 2019 and 2022, before tapering down in 2023. As indicated in Exhibit 11, the median home value price index in Canby increased to \$562,000 (as of April 2023), with annual average price increase of 8.2% over the past five years. Other cities in the region have experienced even larger home price increases (Exhibit 11).

**Exhibit 11: Zillow Home Value Price Index in Select Markets**

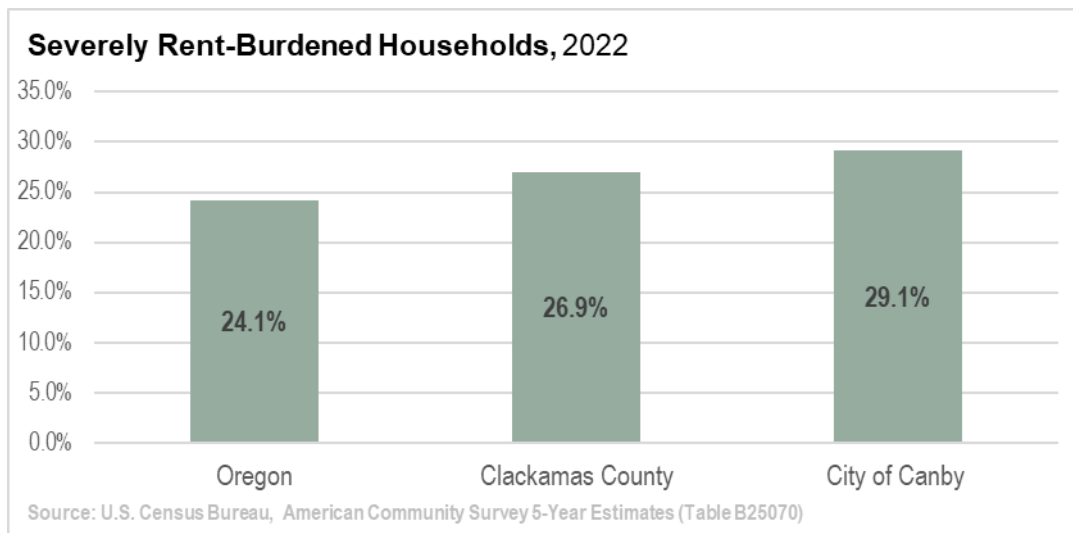
	2019	2020	2021	2022	2023	Annual Change %
Canby	\$432,000	\$463,000	\$560,000	\$581,915	\$561,936	8.2%
Aurora	\$362,000	\$393,000	\$479,000	\$717,490	\$656,116	19.6%
Wilsonville	\$470,000	\$503,000	\$606,000	\$635,102	\$634,357	9.4%
Oregon City	\$446,000	\$479,000	\$579,000	\$596,475	\$582,212	8.3%

*Source: Zillow.com; Home Value Index for December of each year, April 24, 2023.*

According to U.S. Housing and Urban Development (HUD), households are “cost burdened” if they pay over 30% of their income on housing. Households are “severely cost burdened” when they pay over 50% of their income on housing.

As shown in Exhibit 12, over 29% of the rental households in Canby were severely cost burdened in 2022, which is higher than Clackamas County (26.9%) and Oregon as a whole (24.1%).

**Exhibit 12: Canby Severely Rent-Burdened Households**



Input received from stakeholder interviews suggests that rental housing construction in Canby is not keeping up with demand. An evaluation of housing inventory gaps indicates that there is a current shortfall or gap in available rental housing at the upper- and lower-price points (Exhibit 13). This is understandable at the lowest price points where there is always more demand than supply. The fact that there is more housing demand than supply for higher-priced rentals (affordable to those making at least 80% of the MFI) reflects an aging housing inventory and demonstrates strong “pent up” demand for market rate apartments that rent for over \$875 per month.

With favorable housing investment policies, it is likely that there could be near-term market activity for addressing the current estimated 317-unit gap in market rate rental apartments (see Exhibit 13). In addition to this level of pent-up demand for market-rate rentals, it is estimated that at least 180 government subsidized or deed-restricted housing units are needed in Canby.

**Exhibit 13 Rental Housing Gap Analysis, City of Canby\*\***

Median Household Income Range	Affordable Monthly Rent *	Renter-Occupied Households	Rental Units at this Rent Level	Housing Unit (Gap) or Surplus	Pent Up Demand
\$75,000 or more:	\$1,875	424	317	(107)	(317) market rate gap
\$50,000 to \$74,999:	\$1,250-\$1,875	594	384	(210)	
\$35,000 to \$49,999:	\$875-\$1,250	298	785	487	
\$20,000 to \$34,999:	\$500-\$875	399	409	10	
Less than \$20,000:	Less than \$500	313	133	(180)	(180) subsidized housing gap
Zero or Negative Income	Requires subsidy	19	19	-	
<b>Total</b>		<b>2,047</b>	<b>2,047</b>	<b>-</b>	<b>(497)</b>

Source: U.S. Census Bureau., American Community Survey 2010-2019; FCS GROUP.

\* Calculated as 30% of income range based on HUD guidelines

\*\* It should be noted that the rental units shown as "Housing Unit Surplus" reflect housing that is priced at a level that is not consistent with current Canby household income levels for that market segment. These "surplus" rental units are being occupied by households in other income categories, which in turn drives up rental cost burdens for lower-income households.

Historically, during the 11-year time frame (2017 to Aug. 1, 2023), the City of Canby issued building permits for 25 subdivisions and 4 minor partitions. These developments resulted in 774 dwelling units being added over those seven years. As indicated in Exhibit 14, 110.7 net vacant and part vacant acres were utilized for these developments. For a detailed summary of historic subdivision activity by land use category, see Appendix A.

**Exhibit 14**

**Approved Subdivisions and Minor Partitions by Land Area, City of Canby, 2017-2023**

	Less than 1 acre	1 to 5 acres	5 to 10 acres	Over 10 acres	Total
<b>Subdivisions</b>					
No. of Approvals	7	12	2	4	25
Acres included	2.6	29.0	11.8	65.7	109.0
<b>% Distribution</b>	<b>2%</b>	<b>27%</b>	<b>11%</b>	<b>60%</b>	<b>100%</b>
<b>Minor Partitions</b>					
No. of Approvals	4				4
Acres included	1.7				1.7
<b>% Distribution</b>	<b>100%</b>				<b>100%</b>
<b>Total Acres included</b>	<b>4.3</b>	<b>29.0</b>	<b>11.8</b>	<b>65.7</b>	<b>110.7</b>
<b>% Distribution</b>	<b>4%</b>	<b>26%</b>	<b>11%</b>	<b>59%</b>	<b>100%</b>

Source: analysis of new residential construction permits issued between 2017 and 2023, City of Canby Planning Dept. Aug 2023.

Future residential construction in the “development pipeline” will address a portion of the immediate market gap for rentals noted above. As of November 2023, there are 412 dwellings in various stages of development, including 165 apartments/plexes, 48 townhomes and 199 single family homes (Exhibit 15).

**Exhibit 15 Canby Development Construction Pipeline**

**Canby Housing Construction Pipeline - Unit Count and Acres**

Housing Type	Comp. Plan Category	Primary Housing Types	Net Acres	# of Dwelling Units	Dwellings per Net Acre
Single Family Detached	LDR	SFD	49.0	199	4.1
Single Family Attached	MDR	Townhomes	6.2	48	7.7
Multifamily	HDR, DC	Apts.	0.6	5	8.9
Multifamily (Hope Village)	HDR, RC	Apts., & 5 Plexes	11.5	160	13.9
<b>Total</b>			<b>67.3</b>	<b>412</b>	<b>6.1</b>

Source: City of Canby, Nov. 2023.

## Housing Needs

### Summary of Future Housing Needs

There is a linkage between demographic characteristics and housing choice. Housing needs change over a person’s lifetime. Some factors that influence housing include:

- Homeownership rates increase as income rises.
- Single family detached homes are the preferred housing choice as income rises.
- Renters are much more likely to choose multifamily housing options (such as apartments or plexes) than single-family housing.
- Very low-income households (those earning less than 50% of the median family income) are most at-risk for becoming homeless if their economic situation worsens.

Based on the population projections described earlier and the most current household size estimates of 2.7 people per household, the total net new housing need within the Canby UGB over the next 20 years is approximately 2,286, housing units (including 24 units for people living in group quarters) as shown in Exhibit 16. This baseline housing need forecast assumes that the current share of group quarters population (includes people residing in congregate care facilities and housing shelters) and housing vacancy rates remain constant.

## Exhibit 16: Canby Housing Needs Forecast

Canby UGB Baseline Housing Needs Forecast: Safe Harbor			
	2022	2043 forecast	Change
UGB Population	18,655	24,586	5,931
Less Group Quarters Pop. (0.6%)	111	146	35
Pop in Households	18,544	24,440	5,895
Avg. Household Size	2.70	<b>2.70</b>	
Households (year round)	6,872	9,057	2,185
Vacancy and Seasonal Adjustment	3.4%	3.4%	77
Growth-related Housing Demand (dwelling units)	7,115	9,376	<b>2,262</b>
<b>Group Quarters Dwelling Units*</b>			<b>24</b>
<b>Total Housing Units</b>			<b>2,286</b>

\* Category includes group quarters housing demand @1.5 persons per dwelling unit.

### Housing Demand by Dwelling Type and Tenancy

This baseline housing need forecast is generally consistent with the current stratification of households by income level and trend towards increasing need for more attainable middle housing types.

During the HNA process, three additional dwelling demand forecasts were considered by applying “safe harbor” methods that are consistent with Oregon land use planning rules. Those three methods utilize “safe harbor” provisions provided by the State to ascertain dwelling demand and land needs based on jurisdiction size (population level) and housing characteristics.

"Safe harbor" means an optional course of action that a local government may use to satisfy a requirement of Goal 14 (urbanization); and if the city needs to expand their urban growth boundary, a safe harbor analysis lends protections from appeals on certain elements. A safe harbor is not the only way or necessarily the preferred way to comply with the requirements of a housing needs analysis. It was employed for the city of Dallas as an alternative way of looking at residential land need scenarios for the 20-year forecast.

There are four (3) types of safe harbor methods that were considered for the determination of residential land needs for Canby which are consistent with OAR 660-024-0040(8), including:

- » Method 1 Safe Harbor Combined Housing Mix and Density
- » Method 2 Safe Harbor Incremental Mix A
- » Method 3 Safe Harbor Incremental Mix B
- » Method 4 Base Case Scenario (Locally Preferred Method)

Refer to Appendix B for supporting analysis of Methods 1-3 alternative forecast scenarios.

The baseline housing forecast (locally preferred Method 4) is also based on “safe harbor” assumptions for forecasting housing types to address current household income levels and market preferences. The housing demand forecast includes: 1,355 single-family detached homes; 369 townhomes/plexes; 385 multifamily units (apartments); and 154 manufactured housing accessory dwellings (Exhibit 17). There will also be demand for approximately 23 units of group quarters housing (such as congregate care, in-patient care, etc.).

**Exhibit 17: Canby Baseline Housing Needs by Tenure & Housing Type**

Housing Demand Mix	Owner Units	Renter Units	Total Dwelling Units	Projected Housing Need (Units)
<b>Housing Tenure Distribution:</b>	<b>67.9%</b>	<b>32.1%</b>	<b>100.0%</b>	
Single Family Detached			59.9%	1,355
Townhomes / Plexes			16.3%	369
Multi family (5+ units)			17.0%	385
Mfg. home/other			6.8%	154
<b>Total percent</b>			<b>100.0%</b>	
<b>Housing Units</b>	<b>1,536</b>	<b>725</b>		<b>2,262</b>
<b>Group Quarters Dwelling Units*</b>				<b>24</b>
<b>Total Housing Units</b>				<b>2,286</b>

Analysis based on preceding tables.

\* Category includes group quarters housing demand @1.5 persons per dwelling unit.

Exhibit 18 identifies the types of housing products that are most consistent with the projected housing needs for Canby.

**Exhibit 18: Projected Housing Demand by Income Level, Canby UGB**

**Canby UGB Baseline Housing Needs Forecast by Household Income Level**

Household Income Level	Owner Units	Renter Units	Total Dwellings	% Mix	Representative Attainable Housing Products
Upper (120% or more of MFI)	615	-	615	27%	Standard Detached Homes
Upper Middle (80% to 120% of MFI)	691	44	735	32%	Small Lot Homes & Cottages
Lower Middle (50% to 80% of MFI)	230	181	412	18%	Townhomes, Plexes & Mfg. Homes
Low (less than 50% of MFI)	-	261	261	12%	Apts., ADUs, Gov't Assisted
Very Low (less than 30% of MFI)	-	239	239	11%	Apts., ADUs & Govt. Assisted Housing
<b>Housing Units</b>	<b>1,536</b>	<b>725</b>	<b>2,262</b>	<b>100%</b>	
<b>Plus Group Quarters Units</b>	-	<b>24</b>	<b>24</b>		Transitional housing & congregate care
<b>Total Dwelling Units</b>	<b>1,536</b>	<b>749</b>	<b>2,286</b>		
<b>Demand Mix</b>	<b>67%</b>	<b>33%</b>	<b>100%</b>		

Source: estimates based on prior tables and stated assumptions.

To accurately forecast the amount of land required to address 20-year housing needs, the overall housing need must be adjusted to account for near-term development that is in the construction pipeline. As shown in Exhibit 19, the remaining housing that is needed after pipeline construction projects are completed includes 1,874 total housing units.

This housing needs forecast will serve as the basis for forecasting residential land needs for the Canby Urban Growth Boundary.

**Exhibit 19: Projected Housing Demand after Pipeline Construction Units are Built  
Projected 20-year Housing Need After Pipeline BLI Reduction, Canby**

Housing Type	20-Year Dwelling Unit Demand before pipeline adjustment	20-Year Dwelling Unit Demand in pipeline*	Remaining Demand after pipeline adjustment	% Dist.
Single Family Detached (Standard Lots)	615	60	555	30%
Single Family Small Lot & Cottages	735	139	596	32%
Townhomes / Plexes / Mfg. Homes	412	48	364	19%
Apartments/Other**	524	165	359	19%
<b>Total</b>	<b>2,286</b>	<b>412</b>	<b>1,874</b>	<b>100%</b>

*Note: numbers may not add exactly due to rounding.*

*\*Projects in pipeline have pending buildings permits & reflects Hope Village Master Plan, as of Nov. 2023.*

*\*\* Category also includes group quarters housing demand .*



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# Buildable Land Inventory

In accordance with OAR 660-008-0005 (2) and OAR 660-009-0015 (3), an estimate of buildable land inventory (BLI) within Canby's Urban Growth Boundary (UGB) has been created to determine that amount of land available to meet housing and employment needs. The BLI analysis uses the most current Geographic Information Systems (GIS) data provided available for the Canby UGB.

## BLI Methodology

The objective of the BLI is to determine the amount of developable land available for future residential housing and economic development within the UGB. The steps taken to perform this analysis are as follows:

1. Calculate gross acres by plan designation, including classifications for fully vacant and partially-vacant parcels. This step entails "clipping" all of the tax lots that are bisected by the current UGB to eliminate land outside current UGB from consideration for development at this time. City staff input was provided to provide a level of quality assurance to review output is consistent with OAR 660-008-0005(2) and OAR 660-009-0015 (3).
2. Calculate gross buildable acres by plan designation by subtracting land that is constrained from future development, such as such as existing public right-of-way, parks and open space, steep slopes, and floodplains. Canby's Comprehensive Plan call for an additional reduction for wetlands from the buildable land.
3. Calculate net buildable acres by plan designation, by subtracting future public facilities such as roads, schools and parks from gross buildable acres.
4. Determine total net buildable acres by plan designation by taking into account potential redevelopment locations and mixed-use development opportunity areas.

The detailed method used to create the land inventory is described below.

### Residential Land Base

The residential land base reflects current Canby Comprehensive Plan land use designations. Properties that are within the residential land base include the following base zone classifications:

#### Residential Comprehensive Plan Land Use Classifications

- Low Density (LDR)
- Medium Density (MDR)
- High Density (HDR)
- Residential Commercial (RC)
- Downtown Commercial (DC)

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## Residential Zoning Categories

- Rural Residential Farm Forest 5-acre (RRFF5)
- Low Density (R1)
- Medium Density (R1.5)
- High Density (R2)
- Residential Commercial (CR)
- Downtown Commercial (C1)

These classifications have been kept consistent throughout the analysis.

## Land Classifications

The next step in the BLI analysis includes classifying each tax lot (parcel) into one of the following categories. In some cases, tax lots had to be split to accompany different plan classifications. Split tax lots are treated as individual and might go into any of the categories described below.

**Vacant land:** Properties with no structures or have buildings with very little value. For purpose of the BLI, residential lands with improvement value less than \$10,000 are considered vacant. These lands were also subjected to review using satellite imagery via Google Earth; and if the land is in a committed use such as a parking lot, an assessment has been made to determine if it is to be classified as vacant, part vacant or developed.

**Partially vacant land:** Properties that are occupied by a use (e.g., a home or building structure with value over \$10,000) but have enough land to be subdivided without the need for rezoning. This determination is made using tax assessor records and satellite imagery. For Single Family lots, it is assumed that  $\frac{1}{4}$  acre (10,890 sq. ft.) is retained by each existing home, and the remainder is included in the part vacant land inventory. For non-single family uses aerial imagery was used to determine the size of the unused portion.

**Redevelopment Potential:** Includes properties that are occupied by a current building that has a higher land value than building value. Redevelopment tax lots must have at least 20,000 sq.ft. of unconstrained land area and cannot be contained in the developed or partially vacant BLI categories.

**Developed:** Properties unlikely to yield additional residential development for one of two reasons: they possess existing structures at densities that are unlikely to redevelop over the planning period; or they include parcels with Comprehensive Land Use Plan designations that do not permit housing development.

**Note:** The Willamette Valley Country Club is categorized as developed. Portions of the property that are zoned for residential use include the club house and parking lot. The golf course is considered an Outdoor Recreation and Conservation Area by Metro.

**Note:** For this draft of the Canby HNA, the tax lots that have been issued construction permits have been identified as “Pipeline” projects and have been analyzed separately. The land area and housing units associated with these developments are subtracted from the remaining land

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inventory and projected housing needs. Pipeline projects were identified by City staff as parcels where building or construction permits have been issued as of November 2023. The City received direction from DLCD staff that a parcel must have a building permit to be considered developed.

**Other:** Properties which are regarded as unlikely to be developed because they are restricted by existing uses such as: public parks, schools, ballfields, roads and public right-of-way (ROW); common areas held by Homeowners Associations, cemeteries, power substations, and constrained by more than 85% of its area.

These tax lot classifications were validated using satellite imagery, street view, building permit data, and assessor records. Preliminary results were refined based on City staff and public input received during the Housing Needs Analysis (HNA) planning process.

### **Development Constraints**

The BLI methodology for identifying and removing development constraints is consistent with state guidance on buildable land inventories per OAR 660-008-0005(2) and OAR 660-009-0015 (3), as well as 660-038-0070 and 660-038-0130. The BLI is intended to include land that is “suitable, available, and necessary for residential and economic uses.” “Buildable Land” includes residential and economic designated land within the UGB, including vacant, part vacant and land that is likely to be redeveloped; and suitable, available, and necessary for residential uses.

Public-owned land is generally not considered to be available for new growth unless the underlying zoning permits housing. It should be noted that “available” in this context does not mean that the land is presently on the market. It is assumed in this analysis that such land is expected to come on the market within the 20-year timeframe of this study.

Land is identified as “suitable for new development” unless it is:

- Severely constrained by natural hazards as determined by the Statewide Planning Goal 7;
- Designated with natural resource protection measures determined under Statewide Planning Goals 5, 6, 15, 16, 17 or 18;
- Has slopes over 25 percent (average of 25-foot elevation for 100 feet of length);
- Within the 100-year flood plain; or
- Cannot be served with public facilities

Based on state guidelines and data provided by the City of Canby, the following constraints have been deducted from the residential lands inventory.

- Open water of at least one-half acre in size.
- Land within the 100-year floodplains. This includes lands in flood-hazard areas as identified by the Flood Prone classification of Canby’s Comprehensive Plan.
- Wetlands identified by the City and identified in the Comprehensive Plan as a barrier for future development.
- Land within Metro’s ORCA (Outdoor Recreation & Conservation Areas) data set.
- Land in public ownership with no development potential.
- Land with slopes greater than 25%.

Based on this analysis, the land that contains significant environmental constraints (slopes, floodplains, wetlands, etc.) have been identified as “constrained land.”

Partially-vacant land includes properties that are occupied by a use (e.g., a home or building structure with value over \$10,000) with enough land to be subdivided without the need for rezoning. DLCD staff provided guidance regarding “development conversion strike price” assumptions for part-vacant tax lots under 5 acres in size.

This BLI “strike price” analysis assumes that small part-vacant and small high-value tax lots are identified as “constrained” and are not likely to develop within the next 20 years. This analysis assumes that smaller high-value part-vacant land is constrained if at least one of the following factors are met:

- **Small part vacant tax lots with higher-than-average existing home value.** This includes part vacant tax lots with LDR plan designation with under 5 net buildable acres; and part vacant MDR and HDR tax lots with under 2 acres. Average home values for Canby are calculated based on analysis of all developed tax lots within the Canby UGB per 2023 Clackamas County Assessor records (2023 average assessed home value = \$469,235);
- **Very Small part-vacant lots.** This includes part vacant tax lots less than 0.42 acres in size. This lot size is based on a minimum parcel size that is less than 2.5 X the current allowable minimum lot size. For LDR designations this includes tax lots that are under 0.42 acres (7,250 square feet minimum lot size for single family homes @ 6 units per acre) X 2.5 = 18,150 square feet or 0.42 acres). Note, for HDR and MDR part vacant tax lots, the BLI removes all tax lots under 0.42 acres and tax lots under 2 acres with existing homes valued above \$469,235.

The Canby BLI “strike price” constraints analysis identified 162 tax lots with a total of 159.1 acres of part-vacant land that’s constrained by the lot size and high current home value. The average lot size for these tax lots is 0.98 acres. As shown in Exhibit 20, most of this area (116.7 acres) is designated as LDR land.

**Exhibit 20: Part Vacant BLI Constrained by High Existing Home Value and Small Parcel Size**

Part Vacant BLI	<1 acre		1 to 5 acres		Total	
	Acres	Lots	Acres	Lots	Acres	Lots
HDR - High Density Residential	(3.2)	(18)	(7.5)	(5)	(10.7)	(23)
MDR - Medium Density Residential	(4.4)	(20)	(24.9)	(17)	(29.2)	(37)
LDR - Low Density Residential	(15.1)	(36)	(101.6)	(63)	(116.7)	(99)
RC - Residential Commercial	-	-	(2.4)	(1)	(2.4)	(1)
DC - Downtown Commercial	(0.1)	(2)	-	-	(0.1)	(2)
<b>Constrained Part Vacant BLI Adjustment</b>	<b>(22.8)</b>	<b>(76)</b>	<b>(136.3)</b>	<b>(86)</b>	<b>(159.1)</b>	<b>(162)</b>

Source: 3J Consulting and FCS GROUP.

## Redevelopment Opportunities

Properties with redevelopment potential include existing developed tax lots with an assessed land value that is greater than the current improvement (building) value based on 2023 County Assessor records. This BLI also assumes that lots identified for “Redevelopment” has at least 20,000 sq.ft. of buildable land area to be considered for redevelopment over the next 20 years. After removing environmental constraints, this BLI analysis has identified 7 tax lots with a total of 3.4 acres that have redevelopment potential (Exhibit 21).

## Buildable Land Inventory Results

A summary of the Canby UGB residential land base by plan designation is provided in Exhibit 21. The findings indicate there is a total of 1,745.5 acres land designed for residential (also includes mixed use designations that allow housing). The current residential land area includes 1,461 developed acres and approximately 282.2 acres of buildable residential land area (this includes developments in the current construction pipeline). The residential BLI includes only 2.3 acres of vacant unconstrained land, 114.9 acres of constrained vacant land, 163.9 acres of part-vacant land, and 3.4 acres of redevelopment land area.

**Exhibit 21: Residential Land Base by Zone Designation, Canby UGB (includes developments in construction pipeline)**

Comprehensive Plan Category	Developed Land*	Partially	Buildable	Buildable	Redevelopment	Total Buildable	Total
		Constrained Vacant	Vacant	Part Vacant			
HDR - High Density Residential	225.8	10.4	(0.0)	3.3	0.5	14.2	240.0
MDR - Medium Density Residential	238.2	10.5	(0.0)	32.1	0.5	43.1	281.3
LDR - Low Density Residential	946.5	90.9	2.3	127.5	2.0	220.4	1,169.1
RC - Residential Commercial	15.8	2.0	-	1.0	0.5	3.5	19.3
DC - Downtown Commercial	34.8	1.0	(0.0)	-	-	1.0	35.7
<b>Total</b>	<b>1,461.0</b>	<b>114.9</b>	<b>2.3</b>	<b>163.9</b>	<b>3.4</b>	<b>282.2</b>	<b>1,745.5</b>

Source: Canby Buildable Land Inventory; 3J Consulting, May 2024.

\*Developed acreage excluding acreage that falls into vacant, part-vacant and redevelopment categories.

Results summarized in Exhibit 22 indicate that after accounting for the various development constraints identified previously, the remaining residential BLI is comprised of a mix of small, medium and larger tax lots.

**Exhibit 22: BLI by Lot Size, Canby UGB (includes developments in construction pipeline)**

**Residential BLI in Canby UGB (before Pipeline Sites are Removed from BLI)**

<b>Total BLI</b>	<b>&lt;2 acre lots</b>	<b>2 to 5 acre lots</b>	<b>5 to 10 acre lots</b>	<b>&gt;=10 acre lots</b>	<b>Total</b>
HDR - High Density Residential	6.3	2.1	5.9	-	14.2
MDR - Medium Density Residential	8.3	14.6	20.3	-	43.1
LDR - Low Density Residential	38.3	24.2	71.8	86.0	220.4
RC - Residential Commercial	3.5	-	-	-	3.5
DC - Downtown Commercial	1.0	-	-	-	1.0
<b>Total Acres</b>	<b>57.4</b>	<b>40.8</b>	<b>98.0</b>	<b>86.0</b>	<b>282.2</b>
<b>% Distribution</b>	<b>20%</b>	<b>14%</b>	<b>35%</b>	<b>30%</b>	<b>100%</b>

Source: City of Canby Planning Dept.; Canby Buildable Land Inventory; 3J Consulting, May 2024.

Excludes tax lots contained in the construction pipeline.

**Development in the Construction Pipeline**

Adjustments to the remaining BLI have been made to account for vacant land that has been issued a construction permit as of November 2023. According to the City there are 65.2 acres of vacant and part-vacant residential in with building construction permits (Exhibit 23).

**Exhibit 23: Buildable Land Inventory in Development Pipeline by Lot Size, Canby UGB**

<b>BLI in Development Pipeline (sites under construction as of Nov. 2023)</b>	<b>&lt;2 acre lots</b>	<b>2 to 5 acre lots</b>	<b>5 to 10 acre lots</b>	<b>&gt;=10 acre lots</b>	<b>Total</b>
HDR - High Density Residential	1.9	2.1	5.9	-	9.8
MDR - Medium Density Residential	5.9	-	-	-	5.9
LDR - Low Density Residential	9.9	3.0	-	34.7	47.6
RC - Residential Commercial	1.9	-	-	-	1.9
DC - Downtown Commercial	-	-	-	-	-
<b>Total Acres</b>	<b>19.6</b>	<b>5.1</b>	<b>5.9</b>	<b>34.7</b>	<b>65.2</b>
<b>% Distribution</b>	<b>7%</b>	<b>2%</b>	<b>2%</b>	<b>13%</b>	<b>23%</b>

Source: City of Canby Planning Dept.; Canby Buildable Land Inventory; 3J Consulting, November 2023.

**Remaining Unconstrained Buildable Residential Land**

Exhibit 24 shows the remaining amount of buildable residential land after removing tax lots that are in the development construction pipeline. The Canby UGB has a total gross buildable land inventory of 220.8 acres, including 173.7 acres of Low Density land (LDR), 37.2 acres of Medium Density land (MDR), and 9.8 acres of Higher Density land (includes land designated as HDR, RC and DC). Additional detail regarding Canby’s remaining unconstrained residential BLI for vacant, part-vacant and redevelopable land categories is provided in Appendix C.

**Exhibit 24: Remaining Buildable Residential Land, Canby UGB (after removing pipeline developments)**

**Residential BLI in Canby UGB (after Development in Pipeline Sites are Removed from BLI)**

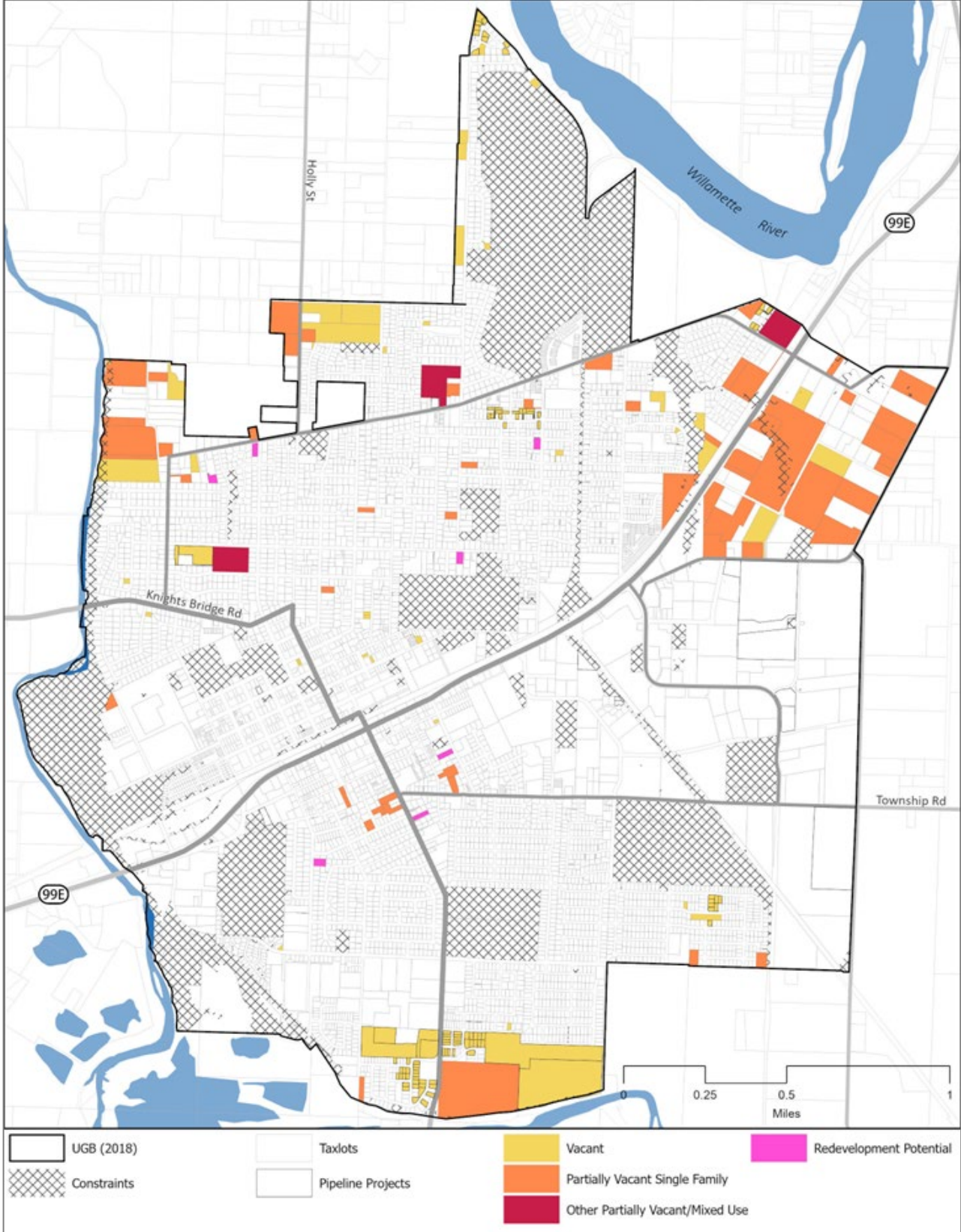
<b>Adjusted BLI After Pipeline is Removed</b>	<b>&lt;2 acre lots</b>	<b>2 to 5 acre lots</b>	<b>5 to 10 acre lots</b>	<b>&gt;=10 acre lots</b>	<b>Total</b>
HDR - High Density Residential	5.4	(0.0)	-	-	5.4
MDR - Medium Density Residential	2.4	14.6	20.3	-	37.2
LDR - Low Density Residential	28.4	21.2	71.8	52.3	173.7
RC - Residential Commercial	3.4	-	-	-	3.4
DC - Downtown Commercial	1.0	-	-	-	1.0
<b>Total Acres</b>	<b>40.6</b>	<b>35.8</b>	<b>92.1</b>	<b>52.3</b>	<b>220.8</b>
<b>% Distribution</b>	<b>18%</b>	<b>16%</b>	<b>42%</b>	<b>24%</b>	<b>100%</b>

Source: City of Canby Planning Dept.; Canby Buildable Land Inventory; 3J Consulting, May 2024.

Exhibit 25 illustrates the residential buildable land inventory (BLI) within Canby’s Urban Growth Boundary (UGB) to determine the amount of land available to meet housing needs.



Exhibit 25. Canby Buildable Land Inventory – by Current Plan Designation



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# Residential Land Need Analysis

This section summarizes the housing-related land needs forecast for long-range planning purposes. The housing land needs forecast represents a 20-year forecast from 2022 through year 2043. These technical findings are consistent with State of Oregon requirements for determining housing needs per Oregon land use planning Goals 10 and 14, OAR Chapter 660, Division 8, and applicable provision of ORS 197.296 to 197.314 and 197.475 to 197.490.

## Housing Need Forecast

As shown earlier in Exhibit 17, the forecasted housing mix for Canby includes 2,286 dwellings that will require vacant or part vacant or redevelopable land. This results in net new housing development on buildable land as follows:

- Single Family Detached: Includes 615 standard lot units and 735 small lot “cottage” homes
- Townhomes, Plexes and Manufactured housing: 412 dwelling units
- Multifamily: 524 dwelling units (includes apartments and condominiums with 5+ units per structure) plus 23 group quarters units).

As shown previously in Exhibit 17, the forecasted housing need of 2,286 dwelling units will be partially addressed by 412 units currently in the development pipeline. Once pipeline developments are completed, the remaining housing demand over the next 20 years is expected to consist of 1,874 dwellings.

## Methodology for Forecasting Residential Land Need

The methodology for projecting housing land needs within the Canby UGB builds upon the residential housing needs forecast for 1,874 dwellings that are not within the current construction pipeline.

The analysis of UGB land requirements to accommodate the planned housing need included the following steps.

**Step 1** takes into account the forecasted number of dwelling units by housing type, including single family detached, townhomes and plexes, multifamily, and manufactured homes as well as group quarters population (derived from Exhibit 17).

**Step 2** considers the amount of new dwellings in the construction pipeline and subtracts them from the total housing demand identified in Step 1 (derived from Exhibit 17).

**Step 3** considers the amount of net buildable land required to accommodate the future housing demand after subtracting the dwellings being constructed in the development pipeline; and applies the expected development density for each general housing type (see Exhibit 26). It should be noted that the City recently amended its development code to allow “middle housing” such as townhomes

and plexes to be constructed in any R-1 or R-1.5 land use zone. As such, the projected density levels are based on the historic level of approved residential developments in Canby plus a “safe harbor” planning assumption that increases prior density levels for each housing type by 3% through infill and redevelopment of existing developed tax lots.

**Step 4** includes an allowance for future roadways and utility easements. The factors used to convert net to gross buildable acres for each housing type are based on City of Canby planning staff analysis of approved subdivision activity that occurred from 2017 to 2023. The factors used in this HNA represent the difference between gross land area and net land based generally upon recorded final plats for buildings and structures, less any land area conveyed to the City for public parks. The resulting average between gross and net land area for future housing equates to a factor of 1.231 (excluding land for public parks). This factor varies for each housing type and accounts for the expected amount of land needed for future roadways, public right of way, and utility easements. Please refer to Appendix A-2 for details.

**Step 5** includes a comparison (reconciliation) between the land need determined in Step 4 and the remaining residential buildable land inventory after pipeline construction projects are subtracted, as presented in Section 3 of the HNA.

Exhibit 26 identifies the housing types and expected density levels that are consistent with the projected housing need. The results indicate a need for 238.8 net buildable acres and 293.9 gross buildable acres (includes future roadway and utility easements but excludes public parks).

**Exhibit 26: Projected Housing Land Need and Density Levels, Canby UGB (excludes public parks)**

Dwelling Unit Type	Proj. 20-Year Housing Need (after pipeline units are deducted)	Most Typical Plan Designation <sup>1</sup>	Most Applicable Local Zones <sup>1</sup>	Allowable Density (DU per Net Ac)	Historic Density (DU per Net Ac) <sup>3</sup>	Expected Avg. Density (DU per Net Ac) <sup>4</sup>	Site Requirements (net buildable acres)	Factor for New Street ROW & Utilities <sup>5</sup>	Gross Buildable Land Need (acres)	Proj. Avg. Net Lot Size per DU
Single Family Detached (Standard Lot)	555	LDR	R-1	3 to 6.6	5.30	5.46	101.7	1.255	127.6	7,984
Single Family (Small Lot)	596	LDR	R-1	3 to 6.6	7.42	7.64	77.9	1.318	102.7	5,699
Townhomes / Plexes <sup>1</sup>	364	MDR	R-1.5	7 to 8.5+	8.60	8.86	41.0	1.105	45.3	4,915
Multi-family/Other <sup>2</sup>	359	HDR/All	R-2, DC	14 to 28+	19.28	19.86	18.1	1.008	18.2	2,194
<b>Total</b>	<b>1,874</b>						<b>238.8</b>	<b>1.231</b>	<b>293.9</b>	

Source: derived from prior tables and analysis of approved subdivisions in Canby between 2017 and 2023.

<sup>1</sup> Manufactured housing is allowed in all residential zones.

<sup>2</sup> Category also includes group quarters housing demand @1.5 persons per dwelling unit.

<sup>3</sup> Actual densities based on analysis of new residential building permits, per City of Canby analysis Aug. 2023. Excludes public parks.

<sup>4</sup> Assumes 3% increase in historic density after adoption of Housing Production Strategy and HB 2001 housing measures.

<sup>5</sup> Reflects site area required for future roads and utility easements; excludes public parks based on city permitting records.

The Canby HNA analysis also evaluated a land needs scenario (Scenario 4A) that reflected a “safe harbor” public facilities factor of 1.25 for all housing types. Those findings are reflected in Appendix A-4 and resulted in higher overall land needs to reflect additional land associated with public parks, which have been excluded from land needs findings shown in Exhibits 26-27. During the HNA process, the City determined that supplemental analysis is needed to ascertain specific amount of additional land needed for parks.

## UGB Sufficiency Analysis

The Canby HNA assumes that all identified unconstrained vacant, part vacant and redevelopable land inside the Canby UGB that is planned for residential or mixed-use development is fully developed for that intended purpose over the next 20 years.

Based on the BLI findings there are 220.8 acres of buildable land supply that has been designated for residential or mixed-use development within the UGB after accounting (subtracting acres) for developments in the construction pipeline. The residential land needed to accommodate 1,874 net new dwellings equates to 293.9 acres (includes roadway right-of-way and utility easements but excludes public parks). As shown in Exhibit 27, the Canby UGB is currently deficient in all residential land use categories.

The amount of additional UGB land that's needed is expressed in gross buildable acres as follows:

- Lower Density = 22.6 acres for standard single-family lots and 33.9 acres for small lots and cottages;
- Medium Density = 8.1 acres needed for townhomes and plexes (2 to 4 units per structure); and
- Higher Density = 8.4 acres needed for apartments and other structures with 5 or more dwelling units per building.

**Exhibit 27: Reconciliation of Residential Land Needs, Canby UGB**

Dwelling Unit Type	Most Typical Plan Designation <sup>1</sup>	Buildable Land Requirement <sup>3</sup>	Current Buildable Land Inventory <sup>3</sup>	Buildable Land Deficit (excluding public parks)	UGB Land Sufficiency (excludes public parks)
Single-Family Standard Lot	LDR	127.62	173.74	(22.62)	<i>inadequate land supply</i>
Single-Family Small Lot & Cottages		102.67		(33.93)	<i>inadequate land supply</i>
Townhomes/Plexes (2-4 units)	MDR	45.34	37.25	(8.10)	<i>inadequate land supply</i>
Multi-family/Other <sup>2</sup>	HDR /varies	18.24	9.82	(8.42)	<i>inadequate land supply</i>
<b>Total (gross buildable acres)</b>		<b>293.87</b>	<b>220.80</b>	<b>(73.07)</b>	<i>inadequate land supply</i>

Source: prior tables; and interpretation of current zoning code and housing development/market conditions.

<sup>1</sup> Manufactured housing is allowed in all residential land use classifications.

<sup>2</sup> Category also includes group quarters housing demand.

<sup>3</sup> Derived from previous Exhibits.

**These BLI findings indicate that the City will need to consider various policy strategies to address these deficiencies and ensure that it can accommodate planned 20-year housing needs for low, medium, and higher-density housing designations.**

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# Findings and Recommendations

## Key Findings

Canby's population growth over the next 20 years will result in new households that will require additional housing. Key findings of the housing needs analysis include:

- Over 29% of renter households in Canby are severely rent burdened with more than 50% of their income going towards monthly housing costs. This share is much higher than the Oregon statewide average of 24.1% based on 2022 American Community Survey five-year data.
- Canby's population is forecast to grow at 1.3% per year over the next two decades, adding approximately 5,931 new residents.
- Population growth will require the addition of 2,286 new dwelling units over the next 20 years.
- The forecasted housing mix that addresses 20-year demand is expected to consist of: 615 standard lot detached homes, 735 small lot "cottage" homes; 412 townhomes/plexes/manufactured homes; and 524 apartments or condominiums with 5+ units per structure.
- The forecasted housing need for 2,286 dwelling units will be partially addressed by 412 units that are currently in the development construction pipeline (construction permits have been issued). Once pipeline developments are completed, the remaining housing demand over the next 20 years is expected to consist of 1,874 dwellings.
- The residential land needed to accommodate 1,874 net new dwellings equates to 293.9 gross buildable unconstrained acres (includes land for housing, roadway right-of-way and utility easements but excludes public parks).
- The results of the residential land sufficiency analysis indicate that the current Canby UGB does not have enough buildable land inventory to address its 20-year housing needs. Based on current Comprehensive Land Use Plan designations for future residential and mixed use development, the overall UGB is deficient by 73.1 gross buildable acres.
- The amount of additional UGB land that's needed is expressed in gross buildable acres as follows:
  - Lower Density = 22.6 acres for standard single-family lots and 33.9 acres for small lots and cottages;
  - Medium Density = 8.1 acres needed for townhomes and plexes (2 to 4 units per structure); and
  - Higher Density = 8.4 acres needed for apartments and other structures with 5 or more dwelling units per building.



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## Housing Strategy Recommendations

Prior to pursuing a UGB expansion to accommodate future housing needs, the City of Canby must demonstrate that the need cannot reasonably be accommodated on land already inside the UGB. The City is required to evaluate opportunities to provide efficient development of residential land within the existing UGB, also known as “land efficiency measures.”

The City of Canby has implemented several land efficiency measures in recent years, including:

- Chapter 16.82 of the Zoning Code has a provision that allows deviations of development standards for "Special Housing Projects for the Elderly or Handicapped."
- Housing in a specifically defined Downtown Core area of the C-1 Zone doesn't have to provide any parking if the development is mixed use.
- The R-2 (High Density) Residential Zone has been amended to require a minimum density of 14 du/ac, preventing lower density development.
- Revised the development code to allow duplexes on lots zoned for single-family detached development.

The City is finalizing a Housing Production Strategy (HPS) concurrent with this Housing Needs Analysis. The purpose of a Housing Production Strategy is to identify specific tools, actions, and policies that the City plans to take to address the housing need identified in the HNA. The City has identified and analyzed 10 strategies in the draft HPS. The City will consider a subset of those strategies, those that can be adopted in the next 1-3 years, as potential land efficiency measures.

**Develop criteria and a process for identifying land to up-zone** (or rezone) to meet the deficit of land for multifamily housing development. The criteria may include considerations of location, transportation access, access to and capacity of infrastructure, site size, development constraints, and other relevant criteria. This policy is recommended because of a developable high-density residential shortfall identified in the Canby Housing Needs Analysis.

**Allow cottages to be developed in clusters with shared central amenities** (such as open spaces) to allow for the development of small single-family detached housing clustered on a lot in the R-1, R-1.5, and R-2 zones. This housing type can provide a range of needed housing. Examples of cottage cluster housing across the state of Oregon include subsidized housing for homeless veterans to market rate developments focused on serving seniors. This policy is recommended because of a need for smaller scale, more affordable housing units.

**Identify opportunities to streamline the process and standards for designing and approving planned developments.** This policy will help to address the need for single-family detached housing in Canby. This policy is recommended so the city can explore ways to reduce the time and monetary costs of producing needed housing in Canby.

**Provide incentives to encourage developers to build planned developments with a variety of housing types,** including incentives to support the development of income-restricted housing. Examples include use of system development charge (SDC) credits for private financing and the

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use of tax increment financing (through new urban renewal district) for funding system roads and infrastructure. This policy will address the need for high-quality, range of housing types in Canby.

**Create SDC fee schedule that is scaled based on dwelling unit size.** Consider per square foot fees rather than fees per dwelling. This policy will reduce the up-front cost of developing smaller housing units while charging more to larger units, creating a more equitable regime of development fees.

# APPENDIX A-1

## Analysis of Subdivision Activity

Canby Historic Density Analysis														
Canby Analysis of Approved Subdivisions, as of Aug 31, 2023														
Year 2017 to 2023 (plus pipeline developments)														
5.23.2024 update														
Category	Year	Development Name	Dwelling Units	Total Gross Buildable Acres	Public Parks Acres	Road, Utilities & Open Space Acres	Net Acres	DU / Total Gross Buildable Ac	DU / Gross Ac (excl parks)	DU / Net Ac (excl. parks)	Avg. Lot Size (gross)	Avg. Lot Size (gross excl. parks)	Avg. Lot Size (net)	Housing Type
Approved/Constructed	2018	Beck Pond	69	13.78	0.86	2.54	10.38	5.0	5.3	6.65	8,699	8,157	6,553	Standard Detached
Approved/Constructed	2018	Cougar Run	23	5		1.17	3.83	4.6	4.6	6.01	9,470	9,470	7,254	Standard Detached
Approved/Constructed	2018	Ivy Ridge Estates***	90	24.68	3.39	7.00	14.29	3.6	4.2	6.30	11,945	10,303	6,916	Standard Detached
Approved/Constructed	2019	DuPont/Territorial Place Estates	9	1.96		0.32	1.64	4.6	4.6	5.49	9,486	9,486	7,938	Standard Detached
Approved/Constructed	2019	Hamilton Acres	41	9.14		2.45	6.69	4.5	4.5	6.13	9,711	9,711	7,108	Standard Detached
Approved/Constructed	2019	Tofte Farms 6	16	4.06		1.06	3	3.9	3.9	5.33	11,053	11,053	8,168	Standard Detached
Approved/Constructed	2020	Dodd's Farm	82	19.32		5.37	13.95	4.2	4.2	5.88	10,263	10,263	7,411	Standard Detached
Approved/Constructed	2020	Postlewait Estates	9	1.95		0.13	1.82	4.6	4.6	4.95	9,438	9,438	8,809	Standard Detached
Approved/Constructed	2021	Northwood Estates 4	15	4.45		1.05	3.4	3.4	3.4	4.41	12,923	12,923	9,874	Standard Detached
Approved/Constructed	2021	Hemmerling aka Territorial Gardens	15	3.17		0.67	2.5	4.7	4.7	6.00	9,206	9,206	7,260	Standard Detached
Approved/Constructed	2022	Mark's Place (R-1 portion only)***	150	52	3.09	20.78	28.13	2.9	3.1	5.33	15,101	14,203	8,169	Standard Detached
Approved/Constructed	2020	Redwood Landing 2	29	5.09		1.35	3.74	5.7	5.7	7.75	7,646	7,646	5,618	Small Lot/Cottage
Approved/Constructed	2021	Redwood Addition 2 (R-1.5 portion only)	12	2.46		1.00	1.46	4.9	4.9	8.22	8,930	8,930	5,300	Small Lot/Cottage
Approved/Constructed	2021	Beckwood Place	42	6.68		1.56	5.12	6.3	6.3	8.20	6,928	6,928	5,310	Small Lot/Cottage
Approved/Constructed	2022	Mark's Place (R-1.5 portion only)***	17	2.9		0.07	2.83	5.9	5.9	6.01	7,431	7,431	7,251	Small Lot/Cottage
Approved/Constructed	2017	Trail Crossing Apartments	58	2.58		0.06	2.52	22.5	22.5	23.02	1,938	1,938	1,893	Multi-family (apts)
Approved/Constructed	2018	Tievoli Apartments	8	0.56		0.00	0.56	14.3	14.3	14.29	3,049	3,049	3,049	Multi-family (apts)
Approved/Constructed	2018	Pine Place	6	0.42		0.00	0.42	14.3	14.3	14.29	3,049	3,049	3,049	Attached SF
Approved/Constructed	2019	Bergman Square	4	0.18		0.00	0.18	22.2	22.2	22.22	1,960	1,960	1,960	Attached SF
Approved/Constructed	2020	Schneider Square	4	0.15		0.00	0.15	26.7	26.7	26.67	1,634	1,634	1,634	Attached SF
Approved/Constructed	2021	Redwood Addition 2 (R-2 portion only)***	32	2.13		0.28	1.85	15.0	15.0	17.30	2,899	2,899	2,518	Attached SF
Approved/Constructed	2021	State Street Apartments	12	0.44		0.00	0.44	27.3	27.3	27.27	1,597	1,597	1,597	Multi-family (apts)
Approved/Constructed	2022	Monen/Wild Hare Rentals	8	0.52		0.00	0.52	15.4	15.4	15.38	2,831	2,831	2,831	Multi-family (apts)
Approved/Constructed	2023	Manzanita Apartments (R-2 portion only)	23	1.01		0.00	1.01	22.8	22.8	22.77	1,913	1,913	1,913	Multi-family (apts)
Minor Partition	2019	MLP 19-02	2	0.49		0.00	0.49	4.1	4.1	4.08	10,672	10,672	10,672	Standard Detached
Minor Partition	2019	MLP 19-01	2	0.15		0.00	0.15	13.3	13.3	13.33	3,267	3,267	3,267	Attached SF
Minor Partition	2018	MLP 18-02	2	0.39		0.00	0.39	5.1	5.1	5.13	8,494	8,494	8,494	Standard Detached
Minor Partition	2018	MLP 18-01 (A)	1	0.18		0.00	0.18	5.4	5.4	5.44	8,001	8,001	8,001	Standard Detached
Minor Partition	2018	MLP 18-01 (B)	8	0.56		0.00	0.56	14.4	14.4	14.38	3,029	3,029	3,029	Multi-family (apts)
Pipeline	2024-25	Subdivisions	199	61.2		12.25	49.00	3.2	3.2	4.06	13,407	13,407	10,725	Standard Detached
Pipeline	2024-25	Townhomes	48	7.8		1.56	6.23	6.2	6.2	7.70	7,071	7,071	5,657	Attached SF
Pipeline	2024-25	Hope Village	36	7.0		0.74	6.26	5.1	5.1	5.75	8,470	8,470	7,580	Attached SF
Pipeline	2024-25	Hope Village	124	4.5		0.22	4.28	27.6	27.6	28.95	1,581	1,581	1,505	Multi-family (apts)

Source: analysis of new residential construction permits issued between 2017 and 2023.  
 \*Area of residential lots only.  
 \*\*Gross land area includes open space, private and public roadways.  
 \*\*\* Development site includes extraordinary environmental features and open space.  
 Source: City of Canby, May 22, 2024.



# APPENDIX A-2

## Analysis of Roads, Public Parks, Utilities within Approved Subdivisions

Canby Historic Density Analysis  
 Canby Analysis of Approved Subdivisions, as of Aug 31, 2023  
 Year 2017 to 2023 (Includes construction pipeline developments)

Category	Year	Development Name	Zone	Dwelling Units	Total Gross Buildable Acres	Gross Buildable Acres (excluding parks)	Net Acres	Housing Type	Public Facilities Added If any	Public Parks Acres	Park Land % of Gross Acres	ROW/Utility % of Gross Acres	Total Public Facilities % of Gross
Approved/Constructed	2018	Beck Pond	R-1	69	13.78	12.92	10.38	Standard Detached	Emerald Necklace Dedication - 37,431 sf & ROW	0.86	6.2%	18.4%	24.7%
Approved/Constructed	2018	Cougar Run	R-1	23	5.00	5.00	3.83	Standard Detached	ROW		0%	23.4%	23.4%
Approved/Constructed	2018	Ivy Ridge Estates***	R-1	90	24.68	21.29	14.29	Standard Detached	Ped paths, public park & trail, city pump station, and ROW Tract A - ped path - 1,439 sf Tract B - Public Park - 16,017 sf Tract C - Emerald Necklace segment - 24,032 sf Tract E - Public Park - 35,190 sf Tract F - Emerald Necklace Trail - 72,540 sf	3.39	13.7%	28.4%	42.1%
Approved/Constructed	2019	DuPont/Territorial Place Estates	R-1	9	1.96	1.96	1.64	Standard Detached	ROW			16.3%	16.3%
Approved/Constructed	2019	Hamilton Acres	R-1	41	9.14	9.14	6.69	Standard Detached	streets & small ped path from cul de sac ped path is 1,966 sf tract			26.8%	26.8%
Approved/Constructed	2019	Tofte Farms 6	R-1	16	4.06	4.06	3	Standard Detached	ROW			26.1%	26.1%
Approved/Constructed	2020	Dodd's Farm	R-1	82	19.32	19.32	13.95	Standard Detached	Tracts for ped paths, ROW dedications, misc. tract Tract A (ped) - 1,476 sf Tract B - defunct Tract C (Ped) - 1,638 sf Tract D (ped) - 1,857 sf Tract E (misc.) - 2,999 sf			27.8%	27.8%
Approved/Constructed	2020	Postlewait Estates	R-1	9	1.95	1.95	1.82	Standard Detached	ROW			6.7%	6.7%
Approved/Constructed	2021	Northwood Estates	R-1	15	4.45	4.45	3.4	Standard Detached	ROW			23.6%	23.6%
Approved/Constructed	2021	Hemmerling aka Territorial Gardens	R-1	15	3.17	3.17	2.5	Standard Detached	ROW			21.1%	21.1%
Approved/Constructed	2022	Mark's Place (R-1 portion only)***	R-1	150	52.00	48.91	27.07	Standard Detached	Neighborhood park (46,081 sf) is privately owned & operated but will be accessible to the public. Emerald necklace trail dedication, misc. open space tracts and private roads, and public ROW dedications [Note, phase w/ trail section doesn't have recorded plat yet, anticipate ~ 3.09 acres tract]	3.09	5.94%	42.0%	47.9%
Approved/Constructed	2020	Redwood Landing 2	R-1.5	29	5.09	5.09	3.74	Small Lot/Cottage	ROW			26.5%	26.5%
Approved/Constructed	2021	Redwood Addition 2 (R-1.5 portion only)	R-1.5	12	2.46	2.46	1.46	Small Lot/Cottage	Tract D - 1,196 sf			40.7%	40.7%
Approved/Constructed	2021	Beckwood Place	R-1.5	42	6.68	6.68	5.12	Small Lot/Cottage	ROW			23.4%	23.4%
Approved/Constructed	2022	Mark's Place (R-1.5 portion only)***	R-1.5	17	2.90	2.90	2.26	Small Lot/Cottage	see R-1 description			22.1%	22.1%
Approved/Constructed	2017	Trail Crossing Apartments	R-2	58	2.58	2.58	2.52	Multi-family (apts)	10-foot wide ROW dedication			2.3%	2.3%
Approved/Constructed	2018	Tievoli Apartments	R-2	8	0.56	0.56	0.56	Multi-family (apts)	none			0.0%	0.0%
Approved/Constructed	2018	Pine Place	R-2	6	0.42	0.42	0.42	Attached SF	frontage ROW dedicated			0.0%	0.0%
Approved/Constructed	2019	Bergman Square	R-2	4	0.18	0.18	0.18	Attached SF	none			0.0%	0.0%
Approved/Constructed	2020	Schneider Square	R-2	4	0.15	0.15	0.15	Attached SF	none			0.0%	0.0%
Approved/Constructed	2021	Redwood Addition 2 (R-2 portion)	R-2	32	2.13	2.13	1.78	Attached SF	ROW			16.4%	16.4%
Approved/Constructed	2021	State Street Apartments	R-2	12	0.44	0.44	0.44	Multi-family (apts)	none			0.0%	0.0%
Approved/Constructed	2022	Monen/Wild Hare Rentals	R-2	8	0.52	0.52	0.52	Multi-family (apts)	none			0.0%	0.0%
Approved/Constructed	2023	Apartments (R-2 portion only)	R-2	23	1.01	1.01	1.01	Multi-family (apts)	none			0.0%	0.0%
Minor Partition	2019	MLP 19-02	R-1	2	0.49	0.49	0.49	Standard Detached	none			0.0%	0.0%
Minor Partition	2019	MLP 19-01	R-2	2	0.15	0.15	0.15	Attached SF	716 sf tract at intersection dedicated			0.0%	0.0%
Minor Partition	2018	MLP 18-02	R-1	2	0.39	0.39	0.39	Standard Detached	none			0.0%	0.0%
Minor Partition	2018	MLP 18-01 (A)	R-2	1	0.18	0.18	0.18	Standard Detached	none			0.0%	0.0%
Minor Partition	2018	MLP 18-01 (B)	R-2	8	0.56	0.56	0.56	Multi-family (apts)	none			0.0%	0.0%
Pipeline	2024-25	Subdivisions	R-1	199	61.25	61.25	49.00	Standard Detached	ROW			20.0%	20.0%
Pipeline	2024-25	Townhomes	R-1.5	48	7.79	7.79	6.23	Attached SF	ROW			20.0%	20.0%
Pipeline	2024-25	Hope Village	R-2	165	15.09	15.09	12.07	Multi-family (apts)	18th ave frontage ROW dedicated			20.0%	20.0%

Source: analysis of new residential construction permits issued between 2017 and 2023, City of Canby Planning Dept. May 22, 2024.

\*Area of residential lots only.

\*\*Gross land area includes open space, private and public roadways.

\*\*\* Development site includes extraordinary environmental features and open space.

**Appendix A-2 (continued)**

**Steps used to determine gross-to-net land ratio for public facilities (excluding parks)**

1. **Step 1.** The factors that are used to convert net to gross buildable acres for each housing type are based on City of Canby planning staff analysis of approved subdivision activity listed in Appendix A-1 and A-2. The approved plans for each subdivision were evaluated to ascertain the gross land area and net land area. Except for the Mark's Place R-1 subdivision, the estimates of net and gross land area are based on final plats that have been officially recorded.
2. **Step 2.** City staff identified that amount to gross land area that was dedicated to public right of way (for streets and paths) and utilities, and public parks.
3. **Step 3.** Results were sorted by housing type (single family detached, small lot/cottages, townhomes/plexes (2-4 units per structure) and multifamily (5 or more units per structure). Density calculations were made to account for the difference between gross and net land area after deducting any land within the subdivision that was dedicated to public parks. This resulted in an overall average land area factor of 1.231 to account for the share of a new subdivision land that's needed for future roadways, public right of way and utility easements/open space (excludes land for public parks). This adjustment factor for public facilities varies for each housing type as noted in the table below.
4. **Step 4.** Applies these factors to the net density assumptions to determine the gross buildable land area that's required for each housing type.

**Example: 50 dwelling unit (DU) small lot subdivision.**

**Net Land Area Requirement (excluding parks):** 50 DUs / 7.42 DUs per net acre = **6.7 acres**

**Total Gross Buildable Land Requirement (excluding parks) =** 1.318 x 6.7 = **8.8 acres**

**Resulting Land Requirement for street right-of-way and utilities:** 8.8 – 6.7 = **2.1 acres** (*excludes*

**Calculation of Gross Land Area Dedicated to Public Facilities (excluding parks)**

Housing Type	Subdivisions in Survey	Dwellings per Gross Acre (excl. parks)	Dwellings per Net Acre (excl. parks)	Ratio of Gross to Net Acres (excluding parks)
Single Family Detached (Standard Lot)	15	4.22	5.30	1.255
Single Family (Small Lot)	4	5.63	7.42	1.318
Townhomes / Plexes / Apts. (Mix of Housing)	7	10.76	11.88	1.105
Multifamily / Apts.	7	19.13	19.28	1.008

*Source: analysis of new residential construction permits issued between 2017 and 2023.*

## APPENDIX A-3

### Analysis of Minor Partitions

City of Canby, Minor Partitions Resulting in New Housing Units: 2018-2023

	MLP 19-02	MLP 19-01	MLP 18-02	MLP 18-01	Total
Zone	R-1	R-2	R-1	R-2	
Parent Lot Size (acres)	0.49	0.12	0.39	0.74	1.74
Partition Area (acres)	0.47	0.10	0.39	0.74	1.71
Resulting Number of New Lots	2	2	2	2	8
Resulting Number of Developed Lots	2	2	2	2	8
Resulting Standard Lots	2		1	1	4
Resulting Small Lots		2	1		3
Resulting Apartments				8	8
Avg. Standard Lot Size (Net SF)	10,254		9,968		10,111
Avg. Small Lot Size (Net SF)			7,102	8,001	7,552
Avg. Apartment Lot Size (Net SF)		2,248			2,248

Source: City of Canby, Planning Department, Nov. 27, 2023.

## APPENDIX A-4

### Scenario 4A: Analysis of UGB Land Needs with Safe Harbor Factor for Public Facilities (including parks)

Dwelling Unit Type	Proj. 20-Year Housing Need (after pipeline units are deducted)	Most Typical Plan Designation <sup>1</sup>	Most Applicable Local Zones <sup>1</sup>	Allowable Density (DU per Net Ac)	Historic Density (DU per Net Ac) <sup>3</sup>	Expected Avg. Density (DU per Net Ac) <sup>4</sup>	Site Requirements (net buildable acres)	Factor for New Street ROW & Utilities <sup>5</sup>	Gross Buildable Land Need (acres)
Single Family Detached (Standard Lot)	555	LDR	R-1	3 to 6.6	5.30	5.46	101.7	1.250	127.1
Single Family (Small Lot)	596	LDR	R-1	3 to 6.6	7.42	7.64	77.9	1.250	97.4
Townhomes / Plexes <sup>1</sup>	364	MDR	R-1.5	7 to 8.5+	8.60	8.86	41.0	1.250	51.3
Multi-family/Other <sup>2</sup>	359	HDR/All	R-2, DC	14 to 28+	19.28	19.86	18.1	1.250	22.6
<b>Total</b>	<b>1,874</b>						<b>238.8</b>	<b>1.250</b>	<b>298.5</b>

Source: derived from prior tables and analysis of approved subdivisions in Canby between 2017 and 2023.

<sup>1</sup> Manufactured housing is allowed in all residential zones.

<sup>2</sup> Category also includes group quarters housing demand @1.5 persons per dwelling unit.

<sup>3</sup> Analysis based on safe harbor public facilities factor of 1.25 for all housing types.

<sup>4</sup> Assumes 3% increase in historic density after adoption of Housing Production Strategy and HB 2001 housing measures.

<sup>5</sup> Reflects site area required for future roads and utility easements; excludes public parks based on city permitting records.

### Scenario 4A: Resulting Overall UGB Land Needed for Housing

#### Projected 20-year Land Sufficiency for Housing, Canby UGB: Scenario 4A

Dwelling Unit Type	Most Typical Plan Designation <sup>1</sup>	Buildable Land Requirement <sup>3</sup>	Current Buildable Land Inventory <sup>3</sup>	Buildable Land Deficit (including public parks)	UGB Land Sufficiency (excludes public parks)
Single-Family Standard Lot	LDR	127.12	173.74	(20.32)	<i>inadequate land supply</i>
Single-Family Small Lot & Cottages		97.40		(30.48)	<i>inadequate land supply</i>
Townhomes/Plexes (2-4 units)	MDR	51.31	37.25	(14.06)	<i>inadequate land supply</i>
Multi-family/Other <sup>2</sup>	HDR /varies	22.63	9.82	(12.81)	<i>inadequate land supply</i>
<b>Total (gross buildable acres)</b>		<b>298.47</b>	<b>220.80</b>	<b>(77.67)</b>	<i>inadequate land supply</i>

Source: prior tables; and interpretation of current zoning code and housing development/market conditions.

<sup>1</sup> Manufactured housing is allowed in all residential land use classifications.

<sup>2</sup> Category also includes group quarters housing demand.

<sup>3</sup> Derived from previous Exhibits.

# APPENDIX B-1

## Supplemental Safe Harbor Housing and BLI Analysis Scenarios 1-3

Table 1: Housing Mix/Density Safe Harbors

A. Coordinated 20- Year Population Forecast	B. Housing Density Safe Harbor Numbers are in Dwelling Units (DU) per net buildable acre	C. Housing Mix Safe Harbor (Percentage of DU that Must be <i>Allowed</i> by zoning)		
		Low Density Residential	Medium Density Residential	High Density Residential
Less than 2,500	<ul style="list-style-type: none"> <li>Required Overall Minimum: 3</li> <li>Assume for UGB Analysis: 4</li> <li>Zone to Allow: 6</li> </ul>	70%	20%	10%
2,501 – 10,000	<ul style="list-style-type: none"> <li>Required Overall Minimum: 4</li> <li>Assume for UGB Analysis: 6</li> <li>Zone to Allow: 8</li> </ul>	60%	20%	20%
10,001 – 25,000	<ul style="list-style-type: none"> <li>Required Overall Minimum: 5</li> <li>Assume for UGB Analysis: 7</li> <li>Zone to Allow: 9</li> </ul>	55%	25%	20%
More than 25,000 but not subject to ORS 197.296	<ul style="list-style-type: none"> <li>Required Overall Minimum: 6</li> <li>Assume for UGB Analysis: 8</li> <li>Zone to Allow: 10</li> </ul>	50%	25%	25%

- **Low Density Residential:** A residential zone that *allows* detached single family and manufactured homes and other needed housing types on individual lots in the density range of 2-6 units per net buildable acre (DU/NBA). The specified mix percentage is a maximum; a local government may allow a lower percentage.
- **Medium Density Residential:** A residential zone that *allows* attached single family housing, manufactured dwelling parks and other needed housing types in the density range of 6-12 units per net buildable acre. The specified mix percentage is a minimum; a local government may allow a higher percentage.
- **High Density Residential:** A residential zone that *allows* multiple family housing and other needed housing types in the density range of 12-40 units per net buildable acre. The specified mix percentage is a minimum; a local government may allow a higher percentage.
- **More than 25,000 but not subject to ORS 197.296:** The current population estimate for the city is less than 25,000 but the 20-year population forecast for the UGB is 25,000 or more. This safe harbor is not available for a jurisdiction subject to ORS 197.296 at the time of a UGB amendment.

## APPENDIX B-2

### Method 1

#### Safe Harbor Combined Housing Mix and Density Method 1, Determination of Residential Land Need, Canby UGB

	Factor	Finding	Units	Source Notes
1	20-Yr Population Growth Forecast:	24,586	population	Table A
2	Is Growth Forecast 10,001 to 25,000?	Yes		
3	20-Yr Population Change	5,931		Table A
4	Group quarters <sup>1</sup>	0.59%	35 dwelling units	Table B
5	Population in Households	5,895	population	calculation
6	Average Household Size	2.70		Table B
7	Number of Households	2,185	households	calculation
8	Vacancy Factor	3.40%	74 dwelling units	Table C
9	Dwelling Units Added	2,295	dwelling units	
10	Dwelling Mix Safe Harbor	Percent	Dwellings	
	Low Density Residential <sup>2</sup>	55%	1,262 dwelling units	see OAR 660-024-0040(f)
	Medium Density Residential <sup>3</sup>	25%	574 dwelling units	see OAR 660-024-0040(f)
	High Density Residential	20%	459 dwelling units	see OAR 660-024-0040(f)
	Total	<b>100%</b>	<b>2,295</b> dwelling units	calculation
11	Dwelling Unit Density Requirements	DU/Net Acre <sup>3</sup>	UGB Land Need Net Acres	
	Required overall minimum	5		see OAR 660-024-0040(f)
	Assume for UGB analysis	<b>7</b>	<b>328</b> net acres	see OAR 660-024-0040(f)
	Zone to Allow	9		see OAR 660-024-0040(f)

<sup>1</sup> reflects people residing in shared living areas (congregate care), adjusted to exclude institutionalized population.

<sup>2</sup> Includes mobile homes and manufactured dwellings.

<sup>3</sup> This applies to all residential zones within City.

## APPENDIX B-3

### Method 2: After Pipeline Development Reduction in Housing Need

#### Safe Harbor Incremental Mix Method 2, Determination of Residential Land Need, Canby UGB

					Source Notes
1 Existing Percentage of Density of Developed Land	Existing Dwellings	Existing Mix	Developed Acres	Current DUs Per Acre	
Low Density Residential <sup>1</sup>	4,136	62.6%			Table C
Medium Density Residential	1,408	21.3%			Table C
High Density Residential	1,064	16.1%			Table C
<b>Total</b>	<b>6,608</b>	<b>100.0%</b>	<b>1,497</b>	<b>4.4</b>	Table D1
2 Increase Overall Density as follows:	Increase Mix			New Overall Density	
	by:				
Average Increase	25%			<b>5.5</b>	see OAR 660-024-0040(h)
3 Planned Percentage of Housing Mix	Percent	Dwellings (After Pipeline Deduction)			
Low Density Residential <sup>1</sup>	55%	555 dwellings			see OAR 660-024-0040(f)
Medium Density Residential	25%	959 dwellings			see OAR 660-024-0040(f)
High Density Residential	20%	359 dwellings			see OAR 660-024-0040(f)
<b>Total</b>	<b>100%</b>	<b>1,874</b> dwellings			calculation calculation
4 Zone to allow new housing mix			UGB		
	New Dwellings	Zone to Allow 2	Assumption for Analysis	Max UGB Land Need (Net Acres)	
Low Density Residential <sup>1</sup>	555	6.0			Table A
Medium Density Residential	959	16.0			Table A
High Density Residential	359	30.0			Table A
<b>Total/Average</b>	<b>1,874</b>	<b>9 +</b>	<b>7 +</b>	<b>268</b>	see OAR 660-024-0040(h)

<sup>1</sup> Includes mobile homes and manufactured dwellings.

<sup>2</sup> This applies to all residential zones within City.

## APPENDIX B-4

### Method 3: After Pipeline Development Reduction in Housing Need

#### Safe Harbor Incremental Mix Method 3, Determination of Residential Land Need, Canby UGB

					Source Notes
1 Existing Percentage of Density of Developed Land	Existing Dwellings	Existing Mix	Developed Acres	Current DUs Per Acre	
Low Density Residential <sup>1</sup>	4,136	63%			Table C
Medium Density Residential	1,408	21%			Table C
High Density Residential	1,064	16%			Table C
<b>Total</b>	<b>6,607</b>	<b>100%</b>	<b>1,497</b>	<b>4.4</b>	Table D1
2 Increase Percentage of Density as follows:	Increase Mix	New Mix			
	by:				
Low Density Residential <sup>1</sup>		48%			see OAR 660-024-0040(i)
Medium Density Residential	10%	31%			see OAR 660-024-0040(i)
High Density Residential	5%	21%			see OAR 660-024-0040(i)
<b>Total</b>		<b>100%</b>			calculation
3 Zone to allow new housing mix	Net New Dwellings Expected	Zone to Allow 2	UGB Assumption for Analysis	Max UGB Land Need (Net Acres)	
Low Density Residential <sup>1</sup>	555	6.0	5.0	<b>111.0</b>	see OAR 660-024-0040(i)
Medium Density Residential	959	16.0	9.0	<b>106.6</b>	see OAR 660-024-0040(i)
High Density Residential	359	30.0	19.0	<b>18.9</b>	see OAR 660-024-0040(i)
<b>Total/Average</b>	<b>1,874</b>	<b>9.0 +</b>	<b>7.0 +</b>	<b>236</b>	see OAR 660-024-0040(i)

<sup>1</sup> Includes mobile homes and manufactured dwellings.

<sup>2</sup> This applies to all residential zones within City.

## APPENDIX C

### Canby BLI Analysis: Remaining Gross Buildable Acres After Removing Pipeline Development

#### Residential BLI in Canby UGB (before Pipeline Sites are Removed from BLI)

Total BLI	<2 acre lots	2 to 5 acre lots	5 to 10 acre lots	>=10 acre lots	Total
HDR - High Density Residential	6.3	2.1	5.9	-	14.2
MDR - Medium Density Residential	8.3	14.6	20.3	-	43.1
LDR - Low Density Residential	38.3	24.2	71.8	86.0	220.4
RC - Residential Commercial	3.5	-	-	-	3.5
DC - Downtown Commercial	1.0	-	-	-	1.0
<b>Total Acres</b>	<b>57.4</b>	<b>40.8</b>	<b>98.0</b>	<b>86.0</b>	<b>282.2</b>
<b>% Distribution</b>	<b>20%</b>	<b>14%</b>	<b>35%</b>	<b>30%</b>	<b>100%</b>

Source: City of Canby Planning Dept.; Canby Buildable Land Inventory; 3J Consulting, May 2024.

Excludes tax lots contained in the construction pipeline.

#### Residential BLI in Canby UGB (includes just Pipeline developments)

BLI in Development Pipeline (sites under construction as of Nov. 2023)	<2 acre lots	2 to 5 acre lots	5 to 10 acre lots	>=10 acre lots	Total
HDR - High Density Residential	1.9	2.1	5.9	-	9.8
MDR - Medium Density Residential	5.9	-	-	-	5.9
LDR - Low Density Residential	9.9	3.0	-	34.7	47.6
RC - Residential Commercial	1.9	-	-	-	1.9
DC - Downtown Commercial	-	-	-	-	-
<b>Total Acres</b>	<b>19.6</b>	<b>5.1</b>	<b>5.9</b>	<b>34.7</b>	<b>65.2</b>
<b>% Distribution</b>	<b>7%</b>	<b>2%</b>	<b>2%</b>	<b>12%</b>	<b>23%</b>

Source: City of Canby Planning Dept.; Canby Buildable Land Inventory; 3J Consulting, November 2023.

#### Residential BLI in Canby UGB (after Pipeline Sites are Removed from BLI)

Adjusted BLI After Pipeline is Removed	<2 acre lots	2 to 5 acre lots	5 to 10 acre lots	>=10 acre lots	Total
HDR - High Density Residential	5.4	(0.0)	-	-	5.4
MDR - Medium Density Residential	2.4	14.6	20.3	-	37.2
LDR - Low Density Residential	28.4	21.2	71.8	52.3	173.7
RC - Residential Commercial	3.4	-	-	-	3.4
DC - Downtown Commercial	1.0	-	-	-	1.0
<b>Total Acres</b>	<b>40.6</b>	<b>35.8</b>	<b>92.1</b>	<b>52.3</b>	<b>220.8</b>
<b>% Distribution</b>	<b>18%</b>	<b>16%</b>	<b>42%</b>	<b>24%</b>	<b>100%</b>

Source: City of Canby Planning Dept.; Canby Buildable Land Inventory; 3J Consulting, May 2024.

Source: 3J Consulting and FCS GROUP, May 2024.



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## City of Canby

### Planning & Development Services

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### July 17, 2024 City Council Staff Report

#### Canby Housing Needs Analysis and Comprehensive Plan Adoption Staff Report (TA 23-03/CPA 24-01)

##### Request:

The City proposes updates to the Comprehensive Plan, incorporating the June 18, 2024, City of Canby Housing Needs Analysis (HNA). The Department of Land Conservation and Development requires that the HNA be adopted as part of the Canby Comprehensive Plan. Below are the findings to incorporate the HNA into the current Canby Comprehensive Plan.

##### SUMMARY CONCLUSIONS

This report includes findings regarding each applicable current Canby Comprehensive Plan and Zoning Code criterion. The proposal is consistent with the Comprehensive Plan and Zoning Code criteria for a Zoning Code Text Amendment.

##### PROPOSAL

The City proposes an amendment to the comprehensive plan incorporating the HNA. The City seeks adoption of the new HNA addressing the 20-year housing needs of Canby as allowed by Oregon Planning Goal 10 and is consistent with the official June 30, 2020 population forecast and the sequential urban growth boundary adoption by the Department of Land Conservation and Development. The HNA identifies the 20-year land use needs with a forecast of approximately 73.1 acres of residential urban growth boundary expansion need and the housing mix to accommodate roughly 6,000 new residents over the next 20 years.

##### COMPLIANCE WITH CITY OF CANBY MUNICIPAL CODE

The Canby Municipal Code defines the requirements for Comprehensive Plan amendment as follows:

##### **Canby Title 16.88.180 Comprehensive Plan Amendments**

- A. Authorization to Initiate Amendments. An amendment to the Comprehensive Plan may be initiated by the City Council, by the Planning Commission, or by the application of a property owner or his authorized agent. The Planning Commission shall, within forty days after closing the hearing, recommend to the City Council approval, disapproval, or modification of the proposed amendment.
- B. Application. Application procedures shall be as described in Chapter 16.89.
- C. Legislative Plan Amendment Standards and Criteria. In judging whether or not a legislative plan amendment shall be approved, the Planning Commission and City Council shall consider:
  1. The remainder of the Comprehensive Plan of the city, and the plans and policies of the county, state, and local districts, in order to preserve functions and local aspects of land conservation and development;

2. A public need for the change;
  3. Whether the proposed change will serve the public need better than any other change which might be expected to be made;
  4. Whether the change will preserve and protect the health, safety and general welfare of the residents in the community;
  5. Statewide planning goals.
- D. Quasi-judicial Plan Amendment Standards and Criteria. In judging whether a quasi-judicial plan amendment shall be approved, the Planning Commission and City Council shall consider:
1. The remainder of the Comprehensive Plan of the city, as well as the plans and policies of the county, state, or any local school or service districts which may be affected by the amendments;
  2. Whether all required public facilities and services exist or will be provided concurrent with the anticipated development of the area.
  3. For proposed Comprehensive Plan amendments, which must consider the long-term adequacy of the transportation system for TPR 660-10-060 compliance, ODOT must be consulted to determine whether a highway project is “reasonably likely to be funded” based on funding projections at that time. (Ord. 740 section 10.8.80, 1984; Ord. 981 section 16, 1997; Ord. 1080, 2001; Ord. 1340, 2011; Ord. 1514, 2019)

**16.88.190 Conformance with Transportation System Plan and Transportation Planning Rule**

- A. A proposed Comprehensive Plan amendment, zone change or land use regulation change, whether initiated by the city or by a private interest, shall be reviewed to determine whether it significantly affects a transportation facility, in accordance with the Transportation Planning Rule (OAR 660-012-0060). A plan or land use regulation amendment significantly affects a transportation facility if it:
1. Changes the functional classification of an existing or planned transportation facility;
  2. Changes standards implementing a functional classification system;
  3. As measured at the end of the planning period identified in the adopted plan:
    - a. Allows types or levels of land use that would result in levels of travel or access that are inconsistent with the functional classification of a transportation facility; or
    - b. Would reduce the performance of the facility below the minimum acceptable performance standard identified in the Transportation System Plan;
    - c. Would worsen the performance of a facility that is otherwise projected to perform below the minimum acceptable performance standard identified in the Transportation System Plan.
- B. Amendments to the Comprehensive Plan and land use regulations which significantly affect a transportation facility shall assure that allowed land uses are consistent with the function, capacity, and performance standards (e.g., level of service, volume to capacity ratio, etc.) of the facility identified in the Transportation System Plan. This shall be accomplished by one of the following:
1. Adopting measures that demonstrate allowed land uses are consistent with the planned function, capacity, and performance standards of the transportation facility.

2. Amending the TSP or Comprehensive Plan to provide transportation facilities, improvements or services adequate to support the proposed land uses consistent with the requirements of Section – 0060 of the TPR. Such amendments shall include a funding plan or other mechanism so that the facility, improvement or service will be provided by the end of the planning period.
  3. Altering land use designations, densities, or design requirements to reduce demand for vehicle travel and meet travel needs through other modes of transportation.
  4. Amending the TSP to modify the planned function, capacity or performance standards of the transportation facility.
  5. Providing other measures as a condition of development, including transportation system management measures, demand management or minor transportation improvements.
- C. A Traffic Impact Study may be required by the City in accordance with Section 16.08.150. (Ord. 1043, section 3, 2000; Ord. 1237, 2007; Ord. 1340, 2011)

***Finding:*** *The adoption of the Housing Needs Analysis and corresponding Comprehensive Plan text revision is a necessary factual basis for the City to craft Housing Policy for the City. The proposed text amendments do not affect the traffic generation and circulation patterns, level of park and recreation facilities, demand for public facilities and services, protection and use of natural resources or compliance with special purpose plans or programs; however, they do provide more opportunities for the City to meet the demand for housing.*

*The proposed text amendments represent a logical implementation of the Comprehensive Plan. The adoption of Housing Needs Analysis provides the City with a factual basis on which to rely when creating housing goals and policies consistent with state requirements. Goals and policies will be further developed as part of the on-going Comprehensive Plan update process. The current Comprehensive Plan Housing Element Goal, “To provide for the housing needs of the citizens of Canby” is consistent with those needs identified in the Housing Needs Analysis. The Housing Needs Analysis is also consistent with the Canby Comprehensive Plan and Transportation System Plan policies and meets community needs and has been vetted through an in-depth public process that included a buildable lands assessment and was vetted with the Oregon State Department of Land Conservation and Development.*

*The proposed text amendment does not include changes to the Transportation System Plan or significantly affect a transportation facility. The proposed text amendment is in compliance with the Transportation Planning Rule. This standard is met.*

**(2) The proposed amendment complies with all applicable Statewide Planning Goals and administrative rule requirements.**

***Finding:*** *Oregon’s 19 Statewide Planning Goals are addressed below. Though several of the goals are not applicable to the proposed Comprehensive Plan text amendments, those that are applicable are responded to in detail.*

**Goal 1 Citizen Involvement**

*The proposed HNA and Comprehensive Plan text amendment do not specifically address citizen involvement.*

*This land use application is subject to a City of Canby Type IV land use review, which includes a significant citizen involvement component. This process has been established by the City and is determined to be consistent with this goal. The mandatory public notice of the action and decision, and the hearings on this case before the Planning Commission and City Council are all avenues of citizen participation. Additionally, the HNA has been vetted through an in-depth public process that included an advisory committee, buildable lands assessment, several open houses and planning commission and city council work sessions and was vetted with the Oregon State Department of Land Conservation and Development.*

**Goal 2 Land Use Planning**

*This statewide goal requires that land use decisions 1) have an adequate factual base, 2) that alternatives have been considered, and 3) that implementation measures are consistent with and adequate to carry out Comprehensive Plan.*

*The process identified above was utilized in the drafting of this proposed HNA and Comprehensive Plan Text Amendment. Alternatives in the buildable lands methodology were considered and publicly vetted and have been considered throughout the drafting of the HNA. The proposed changes are consistent with and adequate to carry out the Comprehensive Plan.*

**Goal 3 Agricultural Lands**

*This goal does not apply because the City does not include areas designated for agricultural use.*

**Goal 4 Forest Lands**

*This goal does not apply because the City does not include areas designated for forest use.*

**Goal 5 Open Spaces, Scenic and Historic Areas, and Natural Resources**

*There are no proposed changes to text or policy regarding Goal 5 open spaces, scenic and historic areas and natural resources. Therefore, the intent of this goal remains satisfied by the policies of the Comprehensive Plan and implementation in the Zoning Ordinance.*

**Goal 6 Air, Water and Land Resources Quality**

*There are no proposed changes to text regarding air, water, or land resources. Therefore, the intent of this goal remains satisfied by the policies of the Comprehensive Plan and implementation in the Zoning Ordinance.*

**Goal 7 Areas Subject to Natural Hazards**

*There are no proposed changes to text regarding areas subject to natural hazards. Therefore, the intent of this goal remains satisfied by the policies of the Comprehensive Plan and implementation in the Zoning Ordinance.*

**Goal 8 Recreational Needs**

*There are no proposed changes to text regarding recreational needs. Therefore, the intent of this goal remains satisfied by the policies of the Comprehensive Plan and implementation in the Zoning Ordinance.*

**Goal 9 Economic Development**

*The HNA will be consistent with the adopted Economic Opportunities Analysis that provides the City a factual basis on which to make economic policy decisions.*

**Goal 10 Housing**

*The HNA is consistent with state requirements for identifying 20-year forecasted residential needs and housing mix and has been vetted with Department of Land Conservation and Development staff. Therefore, the intent of this goal remains satisfied by the policies of the Comprehensive Plan and implementation in the Zoning Ordinance.*

**Goal 11 Public Facilities and Services**

*There are no proposed changes to text regarding public facilities and services. Therefore, the intent of this goal remains satisfied by the policies of the Comprehensive Plan and implementation in the Zoning Ordinance.*

**Goal 12 Transportation**

*The Transportation Planning Rule (TPR), OAR 600-012.0060, requires that, where an amendment to a Comprehensive Plan or zoning regulation would significantly affect an existing or planned transportation facility, the local government shall put in place measures that assure that allowed land uses are consistent with the function, capacity, and performance standards of the facility. The proposed HNA does not, in and of itself, propose any changes to an existing or planned transportation facility. However, the amount of housing land needed projected in the HNA has the potential to affect transportation facilities throughout the city. The residential land need identified in the HNA will be used to inform the city's UGB expansion process, in which transportation facility analysis is addressed. In addition, any annexations into the city limits of residential lands identified in the HNA will require TPR analysis. Any impact to the transportation network will be addressed prior to expansion of the city and as such, the proposed zoning code text amendment does not affect the transportation system of the City.*

**Goal 13 Energy Conservation**

*There are no identifiable energy consequences of this land use action. The proposed text amendments will not result in any appreciable difference in waste production or recycling compared with development under the existing zoning.*

**Goal 14 Urbanization**

*The adoption of this HNA and Comp Plan Text Amendments prepares the City for the expansion of the Urban Growth Boundary, an on-going effort by the City to provide for the housing needs of the City for the next 20 years. Approval of these updates will support the City's on-going compliance with Goal 14.*

**Goal 15 Willamette River Greenway**

*The Willamette Greenway does include the southern shoreline of the Willamette River on the north side of the City. However, the greenway does not extend into the Urban Growth Boundary and, therefore, encroachment of potential urban uses should not be a problem. Furthermore, most, if not all, of the greenway is in the floodplain; therefore, development will be restricted to comply with Federal Flood Insurance requirements.*

**Goal 16 Estuarine Resources**

**Goal 17 Coastal Shorelands**

**Goal 18 Beaches and Dunes**

**Goal 19 Ocean Resources**

*The City does not have any estuarine resources, and is not on the Oregon Coast, so goals 16 through 19 do not apply.*

**Conditions**

The hearing body (City Council) shall issue a final written order containing findings and conclusions recommending that the City Council approve, approve with conditions or deny the application for the Comprehensive Plan amendment.

**Finding:** *Staff does not find it necessary to subject this decision to any conditions of approval.*

**CONCLUSION**

Based on the above information, including community outreach, Planning Commission and City Council input and the future needs of Canby over the next 20-years, staff recommends that the City Council approve of the Housing Needs Analysis.



# CITY COUNCIL EXECUTIVE STAFF REPORT SUMMARY

**TO:** Mayor Hodson and Council Members  
**FROM:** Don Hardy, Planning Director  
**THROUGH:** Canby Planning Department  
**DATE:** July 17, 2024

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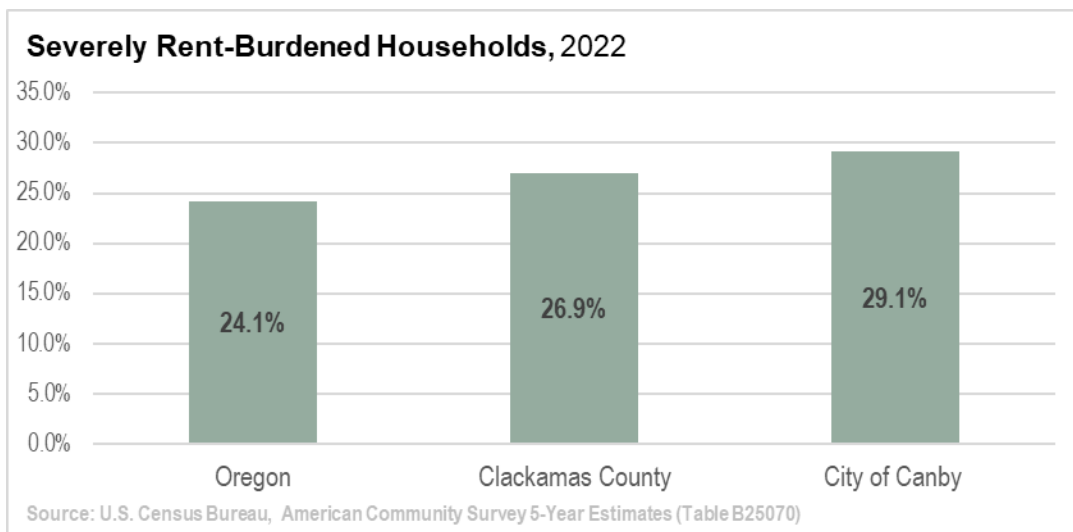
## HOUSING NEEDS ANALYSIS SUMMARY

The draft Housing Needs Analysis (HNA) identifies a significant challenge with providing affordable housing for both fee-owned housing and rental housing currently and over the next 20-years. This staff report addresses housing need affordability. A separate staff report (2024 Canby Housing Needs Analysis and Comprehensive Plan Adoption) has also been developed addressing compliance with the Canby Comprehensive Plan text amendment process and consistency of the proposed HNA with statewide planning goals. The HNA identifies the overall housing acreage needs over the next 20 years.

To understand the housing affordability and housing acreage needs a series of tables are provided below:

The draft HNA identifies those Canby residents who are severely rent burdened:

Canby Severely Rent-Burdened Households



Canby’s rent burdened households are disbursed throughout the entire City, as shown in the following map reflecting the latest estimates for 2022.



The draft HNA identified median home prices in Canby:

	2019	2020	2021	2022	2023	Annual Change %
Canby	\$432,000	\$463,000	\$560,000	\$581,915	\$561,936	8.2%
Aurora	\$362,000	\$393,000	\$479,000	\$717,490	\$656,116	19.6%
Wilsonville	\$470,000	\$503,000	\$606,000	\$635,102	\$634,357	9.4%
Oregon City	\$446,000	\$479,000	\$579,000	\$596,475	\$582,212	8.3%

*Source: Zillow.com; Home Value Index for December of each year, April 24, 2023.*

The draft HNA identifies housing affordability by income in Canby:

**Income by Profession Examples:**

- **Lawyer**  
**\$128,000 Max rent: \$3,200**  
**Max mortgage: \$500,000+**
- **Engineer**  
**\$85,000 Max rent: \$2,000**  
**Max mortgage: \$332,000+**
- **Teacher (middle school)**  
**\$67,000 Max rent: \$1,600**  
**Max mortgage: \$262,000+**
- **Medical Assistant**  
**\$41,700 Max rent: \$1,000)**  
**Max mortgage: \$164,000**
- **Retail Salesperson**  
**\$33,350 Max rent: \$800)**

Median family income in Clackamas County increased to **\$88,517** in 2021 up from \$80,484 in 2019.

The draft HNA identifies housing demand by residential type in Canby:

## Canby Baseline Housing Needs by Tenure & Housing Type

Housing Demand Mix	Owner Units	Renter Units	Total Dwelling Units	Projected Housing Need (Units)
<b>Housing Tenure Distribution:</b>	<b>67.9%</b>	<b>32.1%</b>	<b>100.0%</b>	
Single Family Detached			59.9%	1,355
Townhomes / Plexes			16.3%	369
Multi family (5+ units)			17.0%	385
Mfg. home/other			6.8%	154
<b>Total percent</b>			<b>100.0%</b>	
<b>Housing Units</b>	<b>1,536</b>	<b>725</b>		<b>2,262</b>
<b>Group Quarters Dwelling Units*</b>				<b>24</b>
<b>Total Housing Units</b>				<b>2,286</b>

Analysis based on preceding tables.

\* Category includes group quarters housing demand @1.5 persons per dwelling unit.

## Projected 20-year Housing Need After Pipeline BLI Reduction, Canby

Housing Type	20-Year Dwelling Unit Demand before pipeline adjustment	20-Year Dwelling Unit Demand in pipeline*	Remaining Demand after pipeline adjustment	% Dist.
Single Family Detached (Standard Lots)	615	60	555	30%
Single Family Small Lot & Cottages	735	139	596	32%
Townhomes / Plexes / Mfg. Homes	412	48	364	19%
Apartments/Other**	524	165	359	19%
<b>Total</b>	<b>2,286</b>	<b>412</b>	<b>1,874</b>	<b>100%</b>

Note: numbers may not add exactly due to rounding.

\*Projects in pipeline have pending buildings permits & reflects Hope Village Master Plan, as of Nov. 2023.

\*\* Category also includes group quarters housing demand .

The draft HNA identifies the residential land needs by acreage:

Dwelling Unit Type	Most Typical Plan Designation <sup>1</sup>	Buildable Land Requirement <sup>3</sup>	Current Buildable Land Inventory <sup>3</sup>	Buildable Land Deficit (excluding public parks)	UGB Land Sufficiency (excludes public parks)
Single-Family Standard Lot	LDR	127.6	173.7	(22.6)	<i>inadequate land supply</i>
Single-Family Small Lot & Cottages		102.7		(33.9)	<i>inadequate land supply</i>
Townhomes/Plexes (2-4 units)	MDR	45.3	37.2	(8.1)	<i>inadequate land supply</i>
Multi-family/Other <sup>2</sup>	HDR /varies	18.2	9.8	(8.4)	<i>inadequate land supply</i>
<b>Total (gross buildable acres)</b>		<b>293.9</b>	<b>220.8</b>	<b>(73.1)</b>	<i>inadequate land supply</i>

Source: prior tables; and interpretation of current zoning code and housing development/market conditions.

<sup>1</sup> Manufactured housing is allowed in all residential land use classifications.

<sup>2</sup> Category also includes group quarters housing demand.

<sup>3</sup> Derived from previous Exhibits.

Approximately 73.1 acres of residential urban growth boundary expansion over the next 20-years is required based on the above table.

## COMMUNITY OUTREACH

A significant effort has been made to involve the Canby community in the housing needs analysis development which included:

Housing advisory group meetings:

- March 29, 2022
- June 28, 2022
- September 27, 2022
- February 22, 2023

Other community, Planning Commission and City Council discussions and newspaper articles about the housing production strategy include:

- July 14, 2022, Open House: Housing Needs Analysis and Economic Opportunities Analysis
- July 18, 2022, Community Survey: Housing Needs Analysis and Economic Opportunities Analysis
- October 19, 2022, Joint City Council and Planning Commission Work Session: Housing Need and Economic Opportunity Assessment
- November 2, 2022, City Council Work Session: Housing Need and Economic Opportunity Assessment
- November 28, 2022, Planning Commission Work Session: Housing Needs Analysis, Housing Production Strategy, and Economic Opportunity Analysis Update
- January 18, 2023, City Council Work Session Housing Needs Analysis Update
- January 23, 2023, Planning Commission Work Session Housing Needs Analysis Update
- January 24, 2023, Open House: Economic Opportunity Analysis and Housing Production Strategy
- January 31, 2023, Community Survey: Housing Production Strategy and Economic Opportunities Analysis
- March 1, 2023, Joint City Council and Planning Commission Work Session: Housing and Economic Studies
- February 12, 2024, Planning Commission Work Session: Canby Housing Needs Assessment Update and Review of Current Residential Standards Planning
- March 25, 2024, Planning Commission Work Session: Canby Housing Needs Assessment and Housing Production Strategy Update
- April 17, 2024, City Council Work Session: Housing Needs Analysis
- April 22, 2024, Planning Commission Work Session: Canby Housing Needs Analysis

Canby Herald Newspaper Articles:

- December 6, 2022, Canby Explores Housing Needs As Population Grows
- January 27, 2023, Canby Public Asked To Weigh In On Housing (included community survey link)

## RECOMMENDATION

The HNA was submitted to the DLCDC 35 days in advance of the first evidentiary hearing as required by state law.

Based on the above information, including community outreach, Planning Commission and City Council input and the future needs of Canby over the next 20 years, staff recommends that the City Council approve of the Housing Needs Analysis.

Recommended motion *“I move that the City Council approve the Housing Needs Analysis.”*

#### **ATTACHMENTS**

- *City of Canby, Housing Needs Analysis, June 18, 2024*

## **Confirmation of PAPA Online submittal to DLCD**

DLCD Plan Amendments

To: Laney Fouse Lawrence

Sent: 5/2/2024 5:31 AM

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### **Canby**

Your notice of a revised proposal for a change to a comprehensive plan or land use regulation has been received by the Oregon Department of Land Conservation and Development.

Local File #: TA 23-03

DLCD File #: [005-23](#)

Original Proposal Received: 11/16/2023

Date of Revision: 5/2/2024

First Evidentiary Hearing: 6/10/2024

Final Hearing Date: 7/17/2024

Submitted by: fousel

If you have any questions about this notice, please reply or send an email to [plan.amendments@dlcd.oregon.gov](mailto:plan.amendments@dlcd.oregon.gov).



**City of Canby**  
**Planning & Development Services**  
222 NE 2nd Ave / PO Box 930 / Canby, OR 97013  
Phone: 503.266.7001  
[www.canbyoregon.gov](http://www.canbyoregon.gov)

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**PUBLIC HEARING NOTICE**  
**TA 23-03 HOUSING NEEDS ANALYSIS**  
**ADOPTED AS PART OF CANBY COMPREHENSIVE PLAN**

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This Public Hearing Notice is to inform you of the opportunity to comment on the Housing Needs Analysis to be adopted as part of the Canby Comprehensive Plan at the Planning Commission Public Hearing scheduled for Monday, June 10, 2024, at 6 pm, in the City Council Chambers, 222 NE 2<sup>nd</sup> Ave, Canby, OR 97013. The Commission will make a recommendation to City Council regarding this item. The City Council will hold a Public Hearing on Wednesday, July 17, 2024, at 7 pm in the Council Chambers to deliberate the recommendation of the Planning Commission.

**PUBLIC COMMENTS:**

Public Comments are encouraged and can also be submitted in writing. The public also has the opportunity to testify in person or via Zoom to participate during the Public Hearings. See Zoom Meeting Instructions below.

**WHERE TO SEND WRITTEN TESTIMONY:**

Email Is The Best Way To Submit Written Comments – please email your comments to: [PublicComments@canbyoregon.gov](mailto:PublicComments@canbyoregon.gov). Comments for the Planning Commission hearing are accepted prior to as well as during the public hearing, Comments may also be mailed to City of Canby, Attn: Planning, PO Box 930, Canby, OR 97013 or dropped off at the Planning Department, 222 NE 2<sup>nd</sup> Ave, upstairs.

**ZOOM MEETING INSTRUCTIONS:**

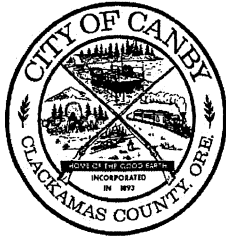
To participate in meetings via Zoom, you will need to request the Zoom invite by calling 503-266-7001 or emailing [PublicComments@canbyoregon.gov](mailto:PublicComments@canbyoregon.gov). If this is your first-time using Zoom, please plan on requesting the invite at least a few days before the meeting so you can practice getting on the Zoom site either by cell phone, tablet or computer. To use Zoom, you will need to sign up for their free service.

**OTHER WAYS TO WATCH THE HEARING:**

The public can watch the live broadcast of all Public Hearings on the City's *YouTube* Channel, by clicking on the link at the top of the meeting agenda which can be found on the City Council or Planning Commission webpage.

Please call our office at 503-266-7001 if you need help locating this information. The City Council and Planning Commission Meetings are broadcast live and can be viewed on CTV5, if you have access. For questions regarding programming, please contact: Willamette Falls Studio (503) 650-0275 or via email at [media@wfmstudios.org](mailto:media@wfmstudios.org).

The meeting location is accessible to persons with disabilities. A request for an interpreter for the hearing impaired or for accommodations for person with disabilities should be made at least 48 hours before the meeting at 503-266-7001.



BEFORE THE PLANNING COMMISSION  
OF THE  
CITY OF CANBY

AN APPLICATION TO UPDATE THE CANBY )  
COMPREHENSIVE PLAN AND DEVELOPMENT )  
CODE ) FINDINGS, CONCLUSION & FINAL ORDER  
TA 23-03  
HOUSING NEEDS ANALYSIS

The City of Canby is proposing updates to the Comprehensive Plan and Development Code to address the housing needs identified in the Housing Needs Analysis.

**CRITERIA AND STANDARDS**

In judging whether or not this legislative land use amendment of the Canby Comprehensive Plan, the Planning Commission must consider the following criteria from Chapter 16.88 of *the Land Development and Planning Ordinance*:

1. The *Comprehensive Plan* of the City, and the plans and policies of the county, state, and local districts, in order to preserve functions and local aspects of land conservation and development;
2. A public need for the change;
3. Whether the proposed change will serve the public need better than any other change which might be expected to be made;
4. Whether the change will preserve and protect the health, safety and general welfare of the residents in the community;
5. Statewide planning goals.

**FINDINGS AND REASONS**

The Planning Commission held a public hearing June 10, 2024, and advanced a recommendation of approval to the City Council for Text Amendment TA 23-03 for the Housing Needs Analysis by a vote of 5 to 1. In their recommendation of approval, the Planning Commission endorsed the findings in the June 10, 2024 staff reports and the May 31, 2024, City of Canby Housing Needs Analysis. The 35-day Department of Land Conservation and Development (DLCD 005-23) notice occurred in advance of the June 10, 2024 hearing as required for adoption of the Housing Needs Analysis. The Planning Commission recommended approval and noted that yearly monitoring of available housing inventory be completed to determine when the city should complete another Housing Needs Analysis.

**CONCLUSION**

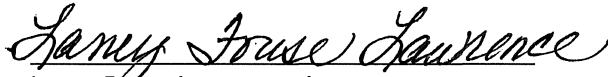
The Planning Commission concludes that the proposed amendment complies with the *Comprehensive Plan* of the City, and the plans and policies of the county, state, and local districts, and will preserve functions and local aspects of land conservation and development.

I CERTIFY THAT THIS ORDER approving TA 23-03 City of Canby Housing Needs Analysis, was presented to and APPROVED by the Planning Commission of the City of Canby.

DATED this 24th day of June 2024.

  
 Matt Ellison  
 Planning Commission Chair

  
 Don Hardy  
 Planning Director

  
 Laney Fouse Lawrence, Attest  
 Recording Secretary

**ORAL DECISION: June 10, 2024**

Name	Aye	No	Abstain	Absent
Matt Ellison, Chair	✓			
Dan Ewert, Vice-Chair				✓
Michael Hutchinson	✓			
Jennifer Driskill	✓			
Judi Jarosh	✓			
Hannah Ellison		✓		
Craig Lewelling	✓			

**WRITTEN DECISION: June 24, 2024**

Name	Aye	No	Abstain	Absent
Matt Ellison, Chair	✓			
Dan Ewert, Vice-Chair			X	
Michael Hutchinson	✓			
Jennifer Driskill	✓			
Judi Jarosh	✓			
Hannah Ellison				X
Craig Lewelling				X