For: **Monday, October 12, 2026**, City Council Meeting

Advance Packet Information

Published: September 29, 2026

Included in this packet is documentation to support the following Agenda items:

PUBLIC HEARINGS/ORDINANCES

1. Fire Code Ordinance
    a. Ordinance 26-O-819
2. Housing Needs Analysis Adoption
    a. Ordinance 26-O-820

*Public Comment forms and the agenda packet are available on-line at www.brookings.or.us, and at Brookings City Hall. Return completed Public Comment forms to the City Recorder before the start of the meeting or during regular business hours.

All public meetings are held in accessible locations. Auxiliary aids will be provided upon request with at least 72 hours advance notification. Please contact 541-469-1102 if you have any questions regarding this notice.

You can view City Council meetings LIVE on television on Charter PEG Channel 181, or stream/view on the City's YouTube Channel: https://www.youtube.com/@cityofbrookingsoregon8039 clicking on "Live" or search 'City of Brookings Oregon YouTube' in your browser.

CITY OF BROOKINGS

COUNCIL AGENDA REPORT

Meeting Date: October 12, 2026

Originating Dept: City Manager

Signature (submitted by)

City Manager Approval

Subject: Fire Code Ordinance

Recommended Motion:

Adopt Ordinance 26-O-819, an ordinance amending Chapter 2 Administration and Personnel and Chapter 15 Building and Construction of the Brookings Municipal Code.

Financial Impact:

No significant direct cost is anticipated to implement the proposed Brookings Municipal Code (BMC) amendments other than City Attorney costs associated with preparation of the ordinance.

In the long term, the recommended approach should reduce or avoid City costs associated with maintaining a local Oregon Fire Code enforcement program, including training, certification, inspection, enforcement, appeals, and administrative responsibilities. Specific savings have not been calculated.

Background/Discussion:

At both the September 14 and 28 City Council Workshops, Council reviewed the proposed revisions to the Brookings Municipal Code concerning administration and enforcement of the Oregon Fire Code. The proposed amendments would remove City administration and enforcement of the Oregon Fire Code and provide for the Oregon State Fire Marshal's Office (OSFM) to administer and enforce the OFC within Brookings.

Attachment(s):

a. Ordinance 26-O-819

IN AND FOR THE CITY OF BROOKINGS
STATE OF OREGON

ORDINANCE 26-O-819

IN THE MATTER OF ORDINANCE 26-O-819, AN ORDINANCE AMENDING CHAPTER 2 ADMINISTRATION AND PERSONNEL AND CHAPTER 15 BUILDING AND CONSTRUCTION OF THE BROOKINGS MUNICIPAL CODE

Sections:

Section 1. Ordinances Identified.
Section 2. Amends Chapter 2 Administration and Personnel
Section 3. Amends Chapter 15 Building and Construction

Section 1. Ordinance Identified. This ordinance amends Chapter 2 Administration and Personnel and amends Chapter 15 Building and Construction

Section 2. Amends Chapter 2 Administration and Personnel by adding Section 2.35.065 Adoption of the Fire Code, deleting 2.35.210 Penalties, amending 2.35.260 Powers and duties of fire marshal and deputy fire marshal, adding 2.35.265 Appeals and adding 2.35.270 Construction- Severability to read as presented in Exhibit A attached hereto with additions designated in bold and underlined and deletions being bold and struck out.

Section 3. Amends Chapter 15 Building and Construction, amending section 15.05.010 Adoption of Codes deleting 15.05.010 (E) to read as presented in Exhibit A attached hereto with additions designated in bold and underlined and deletions being bold and struck out.

First Reading: _____ Passage: _____

Second Reading: _____ Effective Date: _____

Signed by me in authentication of its passage this _____, day of _____, 2026

ATTEST:

_____

Phoebe Pereda

_____

City Recorder Brooklyn Osterhage

Exhibit A

Changes to BMC:

(additions are **bold and underlined**, deletions are ~~**bold and strikeout**~~)

Title 2

Administration and Personnel

2.35.065 Adoption of the Oregon Fire Code.

A. The Oregon Fire Code, as amended or revised by the State of Oregon, including Oregon-adopted appendices (the "Fire Code"), is adopted as fire protection regulations within the City.

B. The Fire Code Official for the City is the Fire Chief or their designee.

~~**2.35.210 Penalties.**~~

~~**Any person violating the provisions of this chapter shall upon conviction pay a fine as defined under Chapter 1.05 BMC, General Penalty, or be imprisoned for a term not to exceed six months or by both such fine and imprisonment. (Ord. 79-O-309 § 27. Formerly 2.35.250; Ord. 12-O-698 § 3; Ord. 18-O-772 § 2 (Exh. A))**~~

2.35.260 Powers and duties of fire marshal and deputy fire marshal.

The fire marshal or ~~**his**~~ **their** deputy shall enforce the provisions of all chapters of the Brookings Municipal Code pertaining to the protection of the city of Brookings from fire**.** ~~**, and all provisions of the State of Oregon Fire Code and standards referenced therein.**~~
(Ord. 18-O-772 § 2 (Exh. A))

2.35.265 Appeals.

A notice or order of the Fire Code Official to comply with the fire prevention statutes may be appealed as provided by ORS 479.180.

2.35.270 Construction – Severability.

If there is a conflict between any provision of the Fire Code and any provision of this chapter, the provisions shall be construed as mutually complementary or supplementary if possible; otherwise, the specific provision of this chapter outside of the Fire Code shall govern. In the event that any provision or part of the Fire Code or this chapter is found invalid or unconstitutional, such finding shall not be construed as affecting the validity or constitutionality of any other provision hereof.
2.35.275 Enforcement.

Violation of any provision of the Fire Code or this chapter, or any order or permit issued under the Fire Code or this chapter shall be considered a violation as defined in BMC 1.05.010. Each day that a violation remains is a separate infraction. The civil infraction remedy is in addition to any other legal or equitable remedy, including the procedures and remedies set forth in the Fire Code.

Title 15

Building and Construction

15.05.010 Adoption of Codes.

~~E.~~ **~~Repealed The currently adopted Oregon Fire Code and referenced NFPA standards;~~**

CITY OF BROOKINGS

COUNCIL AGENDA REPORT

Meeting Date: October 12, 2026

Originating Dept: PW/DS

Signature (submitted by)

City Manager Approval

Subject: Housing Needs Analysis Adoption

Recommended Motion:

Adopt Ordinance 26-O-820, an ordinance amending the City of Brookings Comprehensive Plan by adding a Housing Needs Analysis and Residential Buildable Land Inventory.

Background/Discussion:

Oregon's statewide planning system requires that local jurisdictions ensure an adequate supply of land for residential development. A Housing Needs Analysis (HNA, also known as a Housing Capacity Analysis) provides the technical foundation for communities to develop policy that addresses this responsibility. The geography considered in the HNA consists of Brookings Urban Growth Boundary (UGB).

The City of Brookings has not previously adopted a Goal 10 compliant Housing Needs Analysis or Residential Buildable Lands Inventory. Brookings is not unlike other cities throughout Oregon that face housing shortages and challenges with affordability. A comprehensive study of local housing production and the need for residential land will support Brookings' efforts to implement policy and take other actions that address these issues, encouraging housing production that meets the needs of current and future residents.

Consultant Green Top Planning worked with a stakeholder committee appointed by City Council to develop the HNA over a period of five months, beginning in May of this year. During that time, the stakeholder group met four times, providing comments to the consultant and guiding development of the document. The consultant conducted significant public outreach through an online survey (also provided in hard copy) and in person public involvement activities which included tabling public events and a public open house held on August 31. The project was supported by a grant from Business Oregon.

The HNA examines various factors influencing the need for housing in Brookings (and throughout its Urban Growth Boundary) over a period of 20 years. It found that although Brookings has experienced strong population growth over the past 30 years, future growth is likely to be slower. By 2046 (the end of the 20-year planning period), the total population within Brookings Urban Growth Boundary (UGB) will have reached 12,861, having added a total of 932 new residents since 2026—a nearly 8% increase over 20 years. The Oregon Housing Needs Analysis (OHNA) set a 20-year housing production target of 1,915 homes within the Brookings UGB, or 118 units/year during the first decade of the target period. The largest numbers of units are needed to meet demand for households earning 0-30% of Area Median Income and households earning over 120% of AMI (27% and 26% of the total 1-year production target, respectively).

Affordability continues to be a challenge throughout the Brookings UGB. By the end of 2025 the average monthly median sale price for a home in Brookings was $516,146. The percentage of homeowner households in Brookings that pay more than 30% of their pretax income toward housing is nearly 27%--higher than the statewide average of 25%. Renters in Brookings pay a Median Gross Rent of $1,415, the most among regional peer communities and nearly as much as the statewide average. Nearly 40% of renter households in Brookings are cost burdened, and cost burden is much more pronounced in Harbor where nearly 55% of renter households are cost burdened.

The Residential Buildable Lands Inventory (Chapter 2 of the HNA) documented 4,870 individual properties in the UGB (City of Brookings and portions of unincorporated Curry County, including Harbor) that are zoned for residential uses or currently have a residential use despite not being zoned or planned for a residential use, covering 4,342 acres. 83% of these properties in the UGB are fully developed or otherwise unbuildable, leaving 704 acres of buildable residential land in the UGB. Nearly 407 acres or 58% of all residential land available for development is located within Brookings' city limits. Land in the Lone Ranch Master Plan Area accounts for more than half of this. The remaining 297 acres or 42% of all residential land available for development is located in the unincorporated UGB.

There is sufficient developable residential land available throughout the UGB to meet forecasted housing demand over the next 20 years, and the intervening 7, 10, and 14 year intervals. Much of this capacity is, however, provided by housing planned for the Lone Ranch MPD, which provides enough capacity for low, medium, and high density residential development to meet the 20 year need for low and high density residential development with its boundary. This emphasizes the urgency of realizing the development potential of the Lone Ranch MPD. Even with this planned capacity, there is a need for medium density residential land elsewhere, which can be met across the remainder of the UGB. However, only a little over 25 acres of medium density land are available for development within the City of Brookings, leaving 84 acres of needed medium density residential land in the unincorporated UGB. This presents practical challenges as medium density development may be less likely to occur in the unincorporated UGB where there is less access to public infrastructure capable of supporting development at those densities.

The HNA concludes with eight recommended strategies that address challenges identified in the HNA. They are organized into three categories: Economic, Regulatory, and Policy and Partnerships.

Attachment(s):

a. Ordinance 26-O-820

IN AND FOR THE CITY OF BROOKINGS
STATE OF OREGON

ORDINANCE 26-O-820

IN THE MATTER OF ORDINANCE 26-O-820, AN ORDINANCE AMENDING THE CITY OF BROOKINGS COMPREHENSIVE PLAN TO UPDATE FINDINGS AND POLICIES RELATED TO HOUSING AND GOAL 10 COMPLIANCE.

Sections:

Section 1. Ordinances Identified.
Section 2. Amends the Housing section of the Brookings Comprehensive Plan
Section 3. Adopts by reference and adds to the Housing section of the Brookings Comprehensive Plan

Section 1. Ordinance Identified. This ordinance amends the section of the Brookings Comprehensive Plan related to housing and Goal 10 compliance.

Section 2. Amends the Housing section of the Brookings Comprehensive Plan to read as presented in Exhibit A attached hereto.

Section 3. Adopts by reference and adds to the Housing section of the Brookings Comprehensive Plan the 2026-2046 Brookings Housing Needs Analysis as presented in Exhibit B attached hereto.

Whereas, the Brookings Municipal Code designates the City Council as the approving authority for amendments to its Comprehensive Plan; and

Whereas, at an October 6, 2026 public hearing, the Planning Commission heard public testimony, considered the amendment of the section of the Comprehensive Plan related to housing, and after deliberation recommended that the City Council adopt the amendment as presented; and

Whereas, a public hearing was duly noticed and held before the Brookings City Council on October 12, 2026; and

Whereas, the City Council has concluded that the proposed amendment complies with the applicable standards of review as documented in Exhibit "C", Staff Report dated September 25, 2026.

First Reading: _____ Passage: _____

Second Reading: _____ Effective Date: _____

Signed by me in authentication of its passage this _____, day of _____ , 2026

ATTEST:

_____
Mayor Phoebe Pereda

_____
City Recorder Brooklyn Osterhage

Exhibit "A"

GOAL10 HOUSING

GOAL:

Provision of varied housing types that are safe, sanitary and adequate for all residents of the community.

FINDINGS:

From the 2026 – 2046 Brookings Housing Needs Analysis, which is adopted herein by reference.

Population Growth

Brookings has experienced strong population growth over the past 30 years, adding 2,348 new residents by 2020. This represents a 30-year growth rate of 53.4%. Brookings has grown faster, and more steadily than many other communities on the southern Oregon coast. More recently, however, population growth has slowed.

By some measures, Brookings' future growth is forecasted to be slower than its historical growth. By 2046 (the end of the 20-year planning period), the total population within Brookings Urban Growth Boundary (UGB) will have reached 12,861, having added a total of 932 new residents since 2026—a nearly 8% increase over 20 years. However, the Oregon Housing Needs Analysis (OHNA) has established much more robust outlook for housing demand in the UGB. It has set a 20-year housing production target of 1,915 homes within the Brookings UGB, or 118 units/year during the first decade of the target period. The largest number of units are needed to meet demand for households earning 0-30% of Area Median Income and households earning over 120% of AMI (27% and 26% of the total 1-year production target, respectively).

Affordability

Affordability is a serious concern across Oregon, and Brookings is no exception. According to data collected by the US Census Bureau American Community Survey, renters in Brookings pay a Median Gross Rent of $1,415, the most among regional peer communities and nearly as much as the statewide average. It is important to frame this statistic within the realities of the local housing market: while half of renter households spend less than this, half spend more. According to data collected by the US Census Bureau American Community Survey, nearly 40% of renter households in Brookings spend more than 30% of their pretax household income on rent and basic utilities, and cost burden is much more pronounced in Harbor where nearly 55% of renter households are cost burdened. The percentage of homeowner households in Brookings that pay more than 30% of their pretax income toward housing is nearly 27%--higher than the statewide average of 25%. These findings are consistent with insights received from members of the public through surveys and at public outreach events, as well as members of the stakeholder group.

Changing Community

Brookings is often perceived as an aging community, and while there is truth to this (Brookings median age has climbed to 50.6 from 38.4 in 1990), Brookings is somewhat unique. While it is growing older like much of Oregon, it continues to have a relatively large cohort of school aged children. In fact, 185 of the 469 respondents to the survey reported having school aged children in their household. While Brookings will continue to need larger homes with yards that are often more appealing to families with children, Brookings will also need to plan for more smaller units for a growing number of smaller households.

Data from the American Community Survey demonstrates that Oregon, Curry County, Brookings, and Crescent City are becoming increasingly diverse, although at different rates and

DRAFT

in different ways. The number of individuals reporting Hispanic ethnicity has grown faster in Curry County overall than it has in Brookings where it increased by 0.8% from the 2012-2016 5-year Estimate to the 2020-2024 5-year Estimate. The percentage of Brookings' overall population reporting Hispanic ethnicity has however, remained much higher than Curry County (nearly 11% and nearly 8%, respectively).

Housing Development Trends and Future Production Needs

Housing development in the Brookings UGB has fluctuated over the years. Consistent with historical population trends, residential development in Brookings was highest in the period from 1990-1999 when, according to ACS data, nearly 950 dwelling units were constructed (almost 30% of its existing housing). Harbor, likewise, has newer housing stock, experiencing significant development in the first decade of this century when 266 units were constructed (nearly 18% of its existing housing) over that 10 year period.

Average densities (the number of units/acre of residential zoned land) tend to be much lower than the maximum densities allowed within each zone. R-1-6, for example is the most prevalent residential zone in the City of Brookings, with 1,561 dwelling units on 504 acres. Although this zone allows the densest single unit detached development in Brookings, it has been developed at densities far below the maximum: 3.1 dwelling units/net acre. Although historical residential development patterns have tended toward the lower end of permitted densities, recent residential development has shifted toward higher permitted densities. This suggests emerging market alignment with the need for more medium and higher density housing options.

Historical residential development patterns will need to shift in order to accommodate the community's changing needs. These needs are driven by demographic trends and the need for housing that is affordable to lower and moderate income households. Development of more middle and higher density housing will be needed to match projected demand over the next 20 years. Table 3-10 on page 54 of the Housing Needs Analysis provides a breakdown of projected needed housing by type and income group. This projection is based on the OHNA production target. It identifies a need for 803 low density units, 849 medium density units, and 265 high density units over the 2026 – 2046 planning period.

Housing Land Availability

The Brookings UGB is estimated to have 704 acres of developable residential land in its UGB, enough to accommodate forecasted population growth at 7, 10, 14, and 20 year periods.

The reality, however, is more complicated. Much of the capacity for housing development is located in the Lone Ranch MPD. This master planned development area is entitled for 1,000 dwelling units. The planned unit mix is consistent with the findings of this study that more medium and higher density housing is needed. The fact that Lone Ranch provides so much of the overall housing capacity within the Brookings UGB emphasizes the importance of its timely development.

The results of this study demonstrate that much of the future need for low and high density residential development can be met between the Lone Ranch MPD and other developable residential land in the Brookings city limits. Medium density residential land is, however, a different story. Outside the Lone Ranch MPD, there are only 25 acres of medium density residential land available for development in the Brookings city limits. This means that barring significant rezoning of existing low density residential land in the City of Brookings, an additional 84 acres of medium density residential development will need to occur in the unincorporated part of the UGB. This will likely require close coordination with Curry County to ensure that sufficient medium density land remains available in the unincorporated UGB or

DRAFT

that these lands are annexed and subject to City of Brookings land use regulations.

POLICIES

1. City shall not unduly restrict land development thereby artificially inflating the cost of both new and existing housing, but rather provide land in suitable quantities and encourage the construction of new residential units to meet increased demand.

2. City shall provide for a variety of housing options and sites and plan for suitable locations. It is recognized the private sector will continue their leadership role in this function.

3. City shall advance, where possible, the evolution of safe and aesthetically pleasing residential neighborhoods that are efficiently integrated with business and commercial property, schools, parks, public facilities and other urban development.

4. City shall, through mapping and other means, provide, where known, general information relative to site development suitability.

5. City shall keep an inventory of the city's housing stock and regularly update significant statistics.

6. City shall give consideration to alternative residential construction both in form and layout, for such reasons as aesthetic, energy conservation, lessened development costs, and provision of more usable open space.

7. Manufactured housing shall be allowed in mobile home parks and in all zones that allow single-family houses.

8. City shall, in light of increasing demand for multifamily housing, provide suitable and adequate areas for such development.

9. City shall encourage maintenance of the existing housing stock in safe and livable condition.

10. City shall continuously monitor and inspect all phases of both new residential construction and improvements to existing structures to insure safety and code compliance.

IMPLEMENTATION

1. The city planning commission and staff shall have the continuing responsibilities of seeking compatibility in zoning, building codes and service layout within the city's urbanization boundary.

2. The city shall continue to improve its efforts to make residential neighborhoods more safe and pleasant places to be.

3. The city will continue to consider and/or follow recommendations in comprehensive engineering plans for the water and sewer systems.

4. The city’s Community Development Department shall be responsible for keeping current statistical information regarding the city's housing stock.

5. The city code enforcement officer shall enforce sanitation, nuisance and other ordinances designed especially for the betterment of the living environment in our neighborhoods.

DRAFT

Exhibit “B”



City of Brookings
Housing Needs Analysis
2026-2046

FINAL DRAFT FOR REVIEW
OCTOBER, 2026



Acknowledgments

This study was prepared by Green Top Planning, Development, and Research (Green Top PDR) with the City of Brookings. It was supported by funding from:

STAKEHOLDERS

A group of stakeholders generously committed their time and thoughtful opinions and guidance in the development of this document:

- **Hui Rodomsky,** Oregon Department of Land Conservation and Development
- **Skip Watwood,** Century 21 Agate Realty, Realtor and Property Manager
- **Diana Carter,** CORE Response, Advocacy
- **Clayton Malmberg**, Brookings City Council
- **Mayor Phoebe Pereda,** City of Brookings
- **Sr. Cora Rose,** Deaconess, St. Timothy Episcopal Church
- **Jeff Groom,** CFO South Coast Lumber

PROJECT TEAM

City of Brookings

- **Tim Rundell,** City Manager
- **Wendy Giordano,** Grant/Project Manager
- **Tony Baron,** Public Works and Development Services Director
- **Lauri Ziemer,** Public Works and Development Services

Green Top PDR

- **Nikki Hart-Brinkley**, Principal and GIS Lead
- **Matt Brinkley,** AICP, Principal and Urban Planning Lead

Project Contacts

- **Tim Rundel,** City Manager, trundel@brookings.or.us
- **Nikki Hart-Brinkley**, Green Top PDR, nhart@greentoppdr.com

Table Of Contents

EXECUTIVE SUMMARY 3

CHAPTER 1: Community Profile 6

CHAPTER 2: Residential Buildable Lands Inventory 21

CHAPTER 3. Residential Lands Capacity Analysis 42

CHAPTER 4. Conclusions and Implementation 57

APPENDIX A. GIS Analysis Methodology 64

APPENDIX B. Community Engagement Summary 71

APPENDIX C. Outreach Materials 80

Executive Summary

Although various studies and reports have addressed different aspects of housing in and around Brookings, this is the first Goal 10 compliant Housing Needs Analysis undertaken by the City of Brookings for its Urban Growth Boundary (UGB). Oregon's statewide planning system requires that local jurisdictions ensure an adequate supply of land for residential and employment development.

> Statewide planning Goal 10 charges localities with the responsibility to "provide for the housing needs of citizens of the state" and to create plans that "shall encourage the availability of adequate numbers of needed housing units at price ranges and rent levels which are commensurate with the financial capabilities of Oregon households and allow for flexibility of housing location, type and density."

A Housing Needs Analysis (also known as a Housing Capacity Analysis) provides the technical foundation for communities to develop policy that addresses this responsibility.

But this study, produced over the course 5 months during 2026, is more than an exercise in regulatory compliance: it represents a strong commitment within this community to plan for housing and address challenges so that Brookings has enough of the right housing to meet the needs of its current and future residents. To that end, it includes of an assessment of the factors that will drive demand for housing over the next 20 years and examines the current state of housing and housing production throughout the Brookings Urban Growth Boundary. Finally, it offers a number policy actions that may be taken by the City of Brookings to address deficiencies and challenges.

POPULATION GROWTH

Brookings has experienced strong population growth over the past 30 years, adding 2,348 new residents by 2020. This represents a 30-year growth rate of 53.4%. Brookings has grown faster, and more steadily than many other communities on the southern Oregon coast. More recently, however, population growth has slowed.
By some measures, Brookings' future growth is forecasted to be slower than its historical growth. By 2046 (the end of the 20-year planning period), the total population within Brookings Urban Growth Boundary (UGB) will have reached 12,861, having added a total of 932 new residents since 2026—a nearly 8% increase over 20 years. However, the Oregon Housing Needs Analysis (OHNA) has established much more robust outlook for housing demand in the UGB. It has set a 20-year housing production target of 1,915 homes within the Brookings UGB, or 118 units/year during the first decade of the target period. The largest number of units are needed to meet demand for households earning 0-30% of Area Median Income and households earning over 120% of AMI (27% and 26% of the total 1-year production target, respectively).

AFFORDABILITY

Affordability was the most common concern mentioned housing in public outreach: 83% of survey respondents overall and 94% of self-identified renters identified it as their highest concern. Concern about the availability of housing for the workforce was the second most expressed concern.

> "There is a need for affordable housing for seniors and young families looking to rent or own in the area. Low-income seniors and young working families are being priced out."
>
> *HNA Survey Respondent*

These insights are consistent with data analyzed in this study. According to data collected by the US Census Bureau American Community Survey, renters in Brookings pay a Median Gross Rent of $1,415, the most among regional peer

1. OAR 660-015-0000(10) Goal 10 Housing

communities and nearly as much as the statewide average. It is important to frame this statistic within the realities of the local housing market: while half of renter households spend less than this, half spend more. According to data collected by the US Census Bureau American Community Survey, nearly 40% of renter households in Brookings spend more than 30% of their pretax household income on rent and basic utilities, and cost burden is much more pronounced in Harbor where nearly 55% of renter households are cost burdened. The percentage of homeowner households in Brookings that pay more than 30% of their pretax income toward housing is nearly 27%--higher than the statewide average of 25%. These findings are consistent with insights received from members of the public through surveys and at public outreach events, as well as members of the stakeholder group.

CHANGING COMMUNITY

Respondents to public outreach efforts often characterized Brookings as an aging community, with an influx of wealthier retirees. As some commenters noted, this makes it more difficult for less affluent residents, many of whom provide needed services to the entire community, to find housing, which in turn makes Brookings a less desirable and economically prosperous place to live.

But Brookings is somewhat unique in that while it is growing older like much of Oregon, it continues to have a relatively large cohort of school aged children. The relatively high percentage of individuals reporting at least one type of disability will also require consideration in planning for the future.

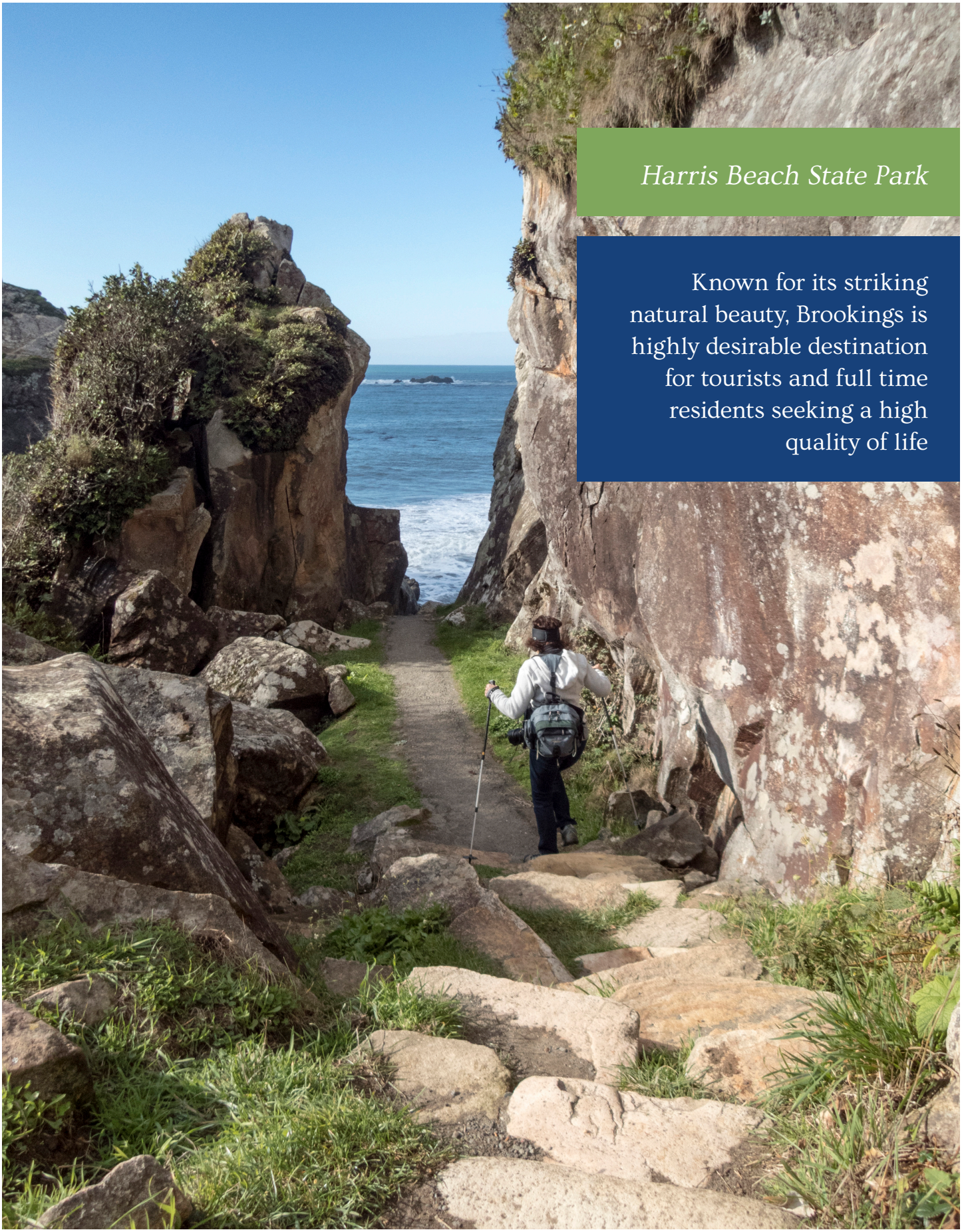
> While Brookings will continue to need larger homes with yards that are often more appealing to families with children, Brookings will also need to plan for more smaller units for a growing number of smaller households.

HOUSING LAND AVAILABILITY

One of the primary tasks of a Housing Needs Analysis and Residential Buildable Lands Inventory is to determine whether or not an Urban Growth Boundary has enough residential land to accommodate expected population growth. This is the point where technical analysis often runs into the limitations of real world conditions. The Brookings UGB is estimated to have 704 acres of developable residential land in its UGB, enough to accommodate forecasted population growth at 7, 10, 14, and 20 year periods.

The reality, however, is more complicated. Much of the capacity for housing development is located in the Lone Ranch MPD. This master planned development area is entitled for 1,000 dwelling units. The planned unit mix is consistent with the findings of this study that more medium and higher density housing is needed. The fact that Lone Ranch provides so much of the overall housing capacity within the Brookings UGB emphasizes the importance of its timely development.

The results of this study demonstrate that much of the future need for low and high density residential development can be met between the Lone Ranch MPD and other developable residential land in the Brookings city limits. Medium density residential land is, however, a different story. Outside the Lone Ranch MPD, there are only 25 acres of medium density residential land available for development in the Brookings city limits. This means that barring significant rezoning of existing low density residential land in the City of Brookings, an additional 84 acres of medium density residential development will need to occur in the unincorporated part of the UGB. This will likely require close coordination with Curry County to ensure that sufficient medium density land remains available in the unincorporated UGB or that these lands are annexed and subject to City of Brookings land use regulations.



Harris Beach State Park

Known for its striking natural beauty, Brookings is highly desirable destination for tourists and full time residents seeking a high quality of life

Chapter 1: Community Profile

KEY FINDINGS

- Brookings has experienced strong population growth over the past 30 years, adding 2,348 new residents by 2020. This represents a 30-year growth rate of 53.4%. Brookings has grown faster, and more steadily than many other communities on the southern Oregon coast. More recently, however, population growth has slowed.

- Brookings' future growth is forecasted to be slower than its historical growth. By 2046 (the end of the 20-year planning period), the total population within Brookings Urban Growth Boundary (UGB) will have reached 12,861, having added a total of 932 new residents since 2026—a nearly 8% increase over 20 years. Growth is forecasted to be fastest at the beginning of this period, slowing considerably thereafter.

- The Oregon Housing Needs Analysis (OHNA) set a 20-year housing production target of 1,915 homes within the Brookings UGB, or 118 units/year during the first decade of the target period. The largest number of units are needed to meet demand for households earning 0-30% of Area Median Income and households earning over 120% of AMI (27% and 26% of the total 1-year production target, respectively).

- At nearly $75,000/year, Brookings has the highest median household income among its regional peers. A little more than a third of households earn less than $50,000/year; another 30% of households fall into the 80-120% income group earning between $60,000 and $90,000/year. Consistent with the 20-year OHNA Housing Production Target, 36% of households (a relatively large percentage) fall into the "over 120%" group, earning $100,000 or more.

- At $446,700 according to the 2020-2024 5-Year ACS Estimate, Brookings has the highest reported home value within its immediate area. According to actual home sales data, by the end of 2025 the average monthly median sale price for a home in Brookings was $516,146.

- Renters in Brookings pay a Median Gross Rent of $1,415, the most among regional peer communities and nearly as much as the statewide average. It is important to frame this statistic within the realities of the local housing market: while half of renter households spend less than this, half spend more. Given this, it is unsurprising that housing cost burden is significant in and around Brookings. The percentage of homeowner households in Brookings that pay more than 30% of their pretax income toward housing is nearly 27%--higher than the statewide average of 25%. Nearly 40% of renter households in Brookings are cost burdened, and cost burden is much more pronounced in Harbor where nearly 55% of renter households are cost burdened.

- Even with a median age that is 10 years older than the statewide median, Brookings has the highest percentage of school aged children of any of its neighbors (nearly 18% of Brookings' population is under 18), including Crescent City. In terms of housing, this suggests that there will be demand for single unit, detached housing with substantial private outdoor space for some time to come.

- According to 2025 Oregon Statewide Homelessness Estimates produced by the Oregon Department of Housing and Community Services (OHCS), Curry County had a "County Homeless Rate" of 8.6/1,000 residents, slightly higher than Coos County at nearly 7/1,000.

- Relatively higher percentages of Brookings and Harbor residents report living with a disability. This is consistent with the age profile for both communities, which is older than average, and something that can be addressed through local housing policy.

HISTORICAL POPULATION TREND

Brookings has experienced strong population growth over the past 30 years, adding 2,348 new residents by 2020. This represents a 30-year growth rate of 53.4%, which exceeds the State's growth rate during that period, and is more than double the rate of growth for Curry County overall during that time. Population grew much faster within Brookings city limits than it did in the unincorporated, urbanized community of Harbor. Over the past 30 years, Brookings has grown faster than its regional peers as well. Although Brookings and Crescent City currently have similar populations, Brookings growth has been more consistent over time, avoiding large fluctuations that Crescent City experienced between 1990 and 2000 when it lost 1,147 residents, and then again between 2000 and 2010 when it gained 3,755.

Regional Peers Historical Population, 1990 – 2020						
Geography	**1990**	**2000**	**2010**	**2020**	**Change 1990-2020**	**% Change 1990-2020**
Oregon	2,842,321	3,421,399	3,831,074	4,237,256	+1,394,935	+49.1%
Curry County, OR	19,327	21,137	22,364	23,446	+4,119	+21.3%
Brookings city, OR	**4,396**	**5,363**	**6,336**	**6,744**	**+2,348**	**+53.4%**
Harbor CDP, OR	2,294	2,688	2,391	2,551	+257	+11.2%
Bandon city, OR	2,297	2,880	3,066	3,321	+1,024	+44.6%
Coos Bay city, OR	15,108	15,443	15,967	15,985	+877	+5.8%
Crescent City, CA	5,035	3,888	7,643	6,673	+1,638	+32.5%

Table 1-1: Regional Peers Historical Population, 1990 – 2020. Data Source: US Census Bureau, 1990 rebased counts (compiled); 2000 DP1; 2010 SF1 P1; 2020 DHC DP1

In addition to data from the US Census Bureau, the Population Research Center at Portland State University (PSUPRC) produces annual "certified" population estimates every year. This provides a more detailed account of population growth and decline, year-over-year. Over the past ten years, Brookings has continued to grow, if not as quickly as it once did. Between 2015 and 2025, the PSUPRC estimates that its population grew by 285 from 6,565 to 6,850. During the period, Brookings grew at an average rate of 0.52% annually. Over that same period, the State grew at a slightly faster rate, while Curry County overall grew at an average rate of 0.43% annually.

> "Over the past 30 years, Brookings' population has grown faster than any of its regional peers, faster than Curry County as a whole, and even faster than the State of Oregon..."[2]

2. The 10-year Average Annual Growth Rates were calculated by averaging annual growth rate PSUPRC certified population estimate data over a 10-year period.

As shown in Figure 1-1, Brookings' annual growth over the past decade has been modest but consistent. A small spike can be seen in 2020, a 1.75% increase over 2019. That sudden increase is offset, however, by a negative growth rate of -1.20% in 2024. Both of these instances are likely to be anomalies attributable to PSUPRC's estimating methodology and not actual changes in population.

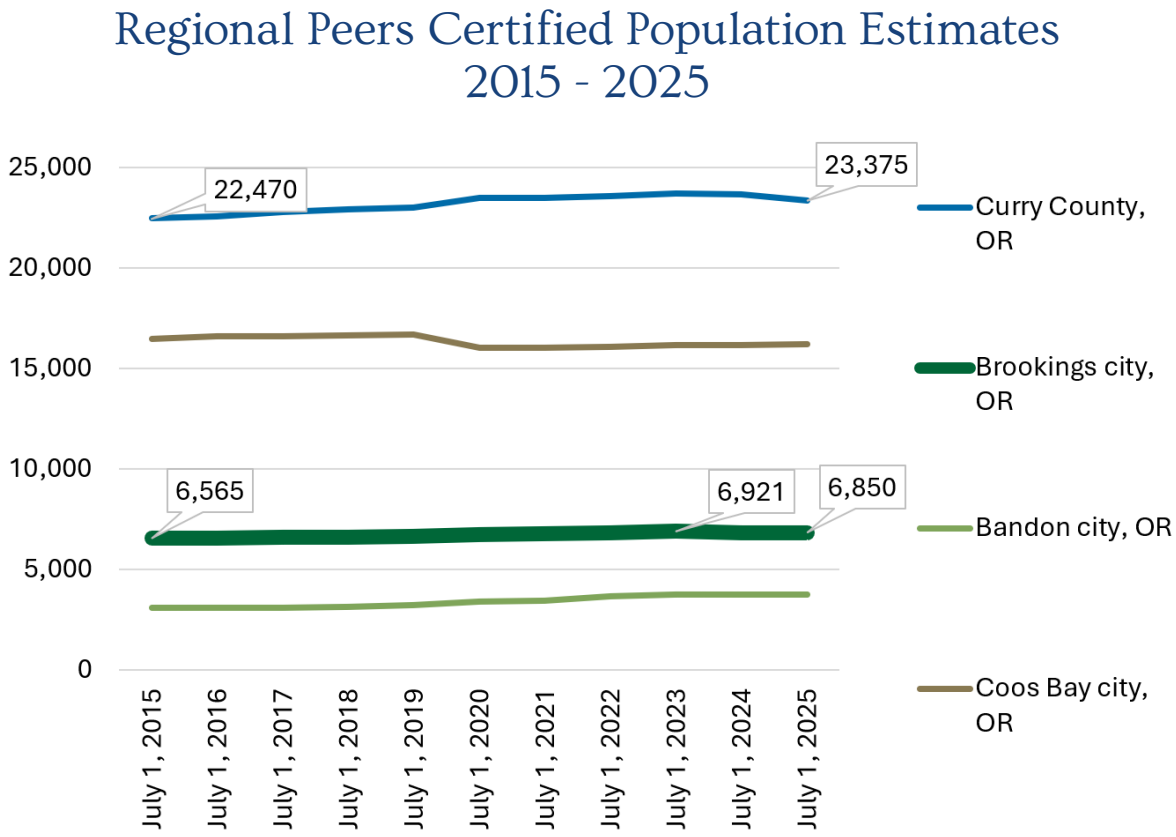


Figure 1-1: Regional Peers Population, 2015 – 2025. Data Source: PSUPRC, Certified Population Estimate Tables, 2015, 2016, 2017, 2018, 2019, 2020, 2025

FUTURE POPULATION TREND

Looking into the future, Brookings is projected to continue to grow, consistent with growth from 2015 – 2025. From the base year of 2026, Brookings' population is expected to grow by 478 over the next seven years, the most robust growth of the longer 20-year planning period. Ten years from now, Brookings will have added another 142 residents, bringing the population within its UGB to 12,548. By 2040, another 144 residents will have been added, and in the final year of the 20-year planning period, the Brookings UGB will reach a total population of 12,861, having added a total of 932 new residents since 2026—a nearly 8% increase over 20 years.

Brookings UGB PSUPRC Forecast, 2026 – 2046					
Select Years	**2026**	**2033**	**2036**	**2040**	**2046**
Forecasted Population	11,929	12,406	12,548	12,692	12,861
Population Change from Base Year		478	620	764	932
Average Annual Growth Rate from Base Year		0.57%	0.52%	0.46%	0.39%
Growth Rate from Base Year		4.00%	5.19%	6.40%	7.81%

Table 1-2: Brookings UGB Population Forecast, 2026 – 2046. Data for years 7, 10, 14, and 20. Data Source: Portland State University Population Research Center, 2026 Preliminary Region 2 Forecast. Population Change, Average Annual Growth Rates, and Growth Rate from Base were calculated by Green Top PDR.

Compared with its peers on Oregon's south coast, Brookings is projected to experience stable, if modest growth (Figure 1-2). It is expected to grow faster than Curry County as a whole, and faster than its smaller regional incorporated peers, Gold Beach and Port Orford, which are projected to lose several hundred residents.[3]

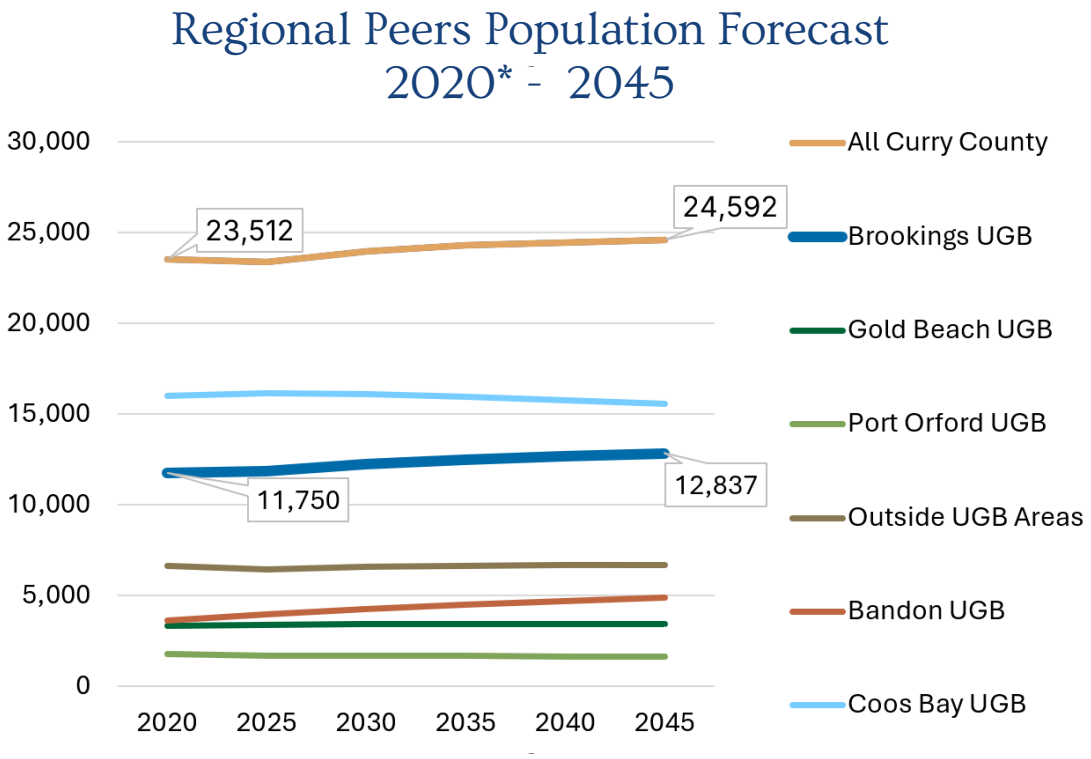


Figure 1-2: Regional Peers Population Forecast. Data Sources: PSUPRC 2026 Preliminary Population Forecast; * PSUPRC Certified Population Estimate

3. Crescent City is not included in PSU's projection, and Harbor is included in the forecast for Brookings UGB.

Accounting for historic underproduction, the presence of second homes and short term rentals, and other factors, the 2026 Oregon Housing Needs Analysis set a robust 20-year target of 1,915 homes for Brookings. Assuming an average household size of 2.19 people per household (see "Household Composition", below), the 932 new residents projected by the PSUPRC 2026 Forecast equates (roughly) to 426 new homes over the 20-year planning period. The difference between the PSUPRC forecast and OHNA housing production target demonstrates the significant influence of other factors on housing demand that are addressed by the OHNA and not by the PSUPRC Forecast.

This production target is further broken down into five (5) income groups (Figure 1-3) that align with household income categories used in a number of housing production programs such as Local Innovation Fast Track (LIFT), administered by Oregon Department of Housing and Community Services (OHCS). Consistent with current income distribution data presented below, the largest proportion of overall housing demand is present at both ends of the income continuum with the lowest and highest income households generating the most demand (approximately 30 new units/ year for each group).

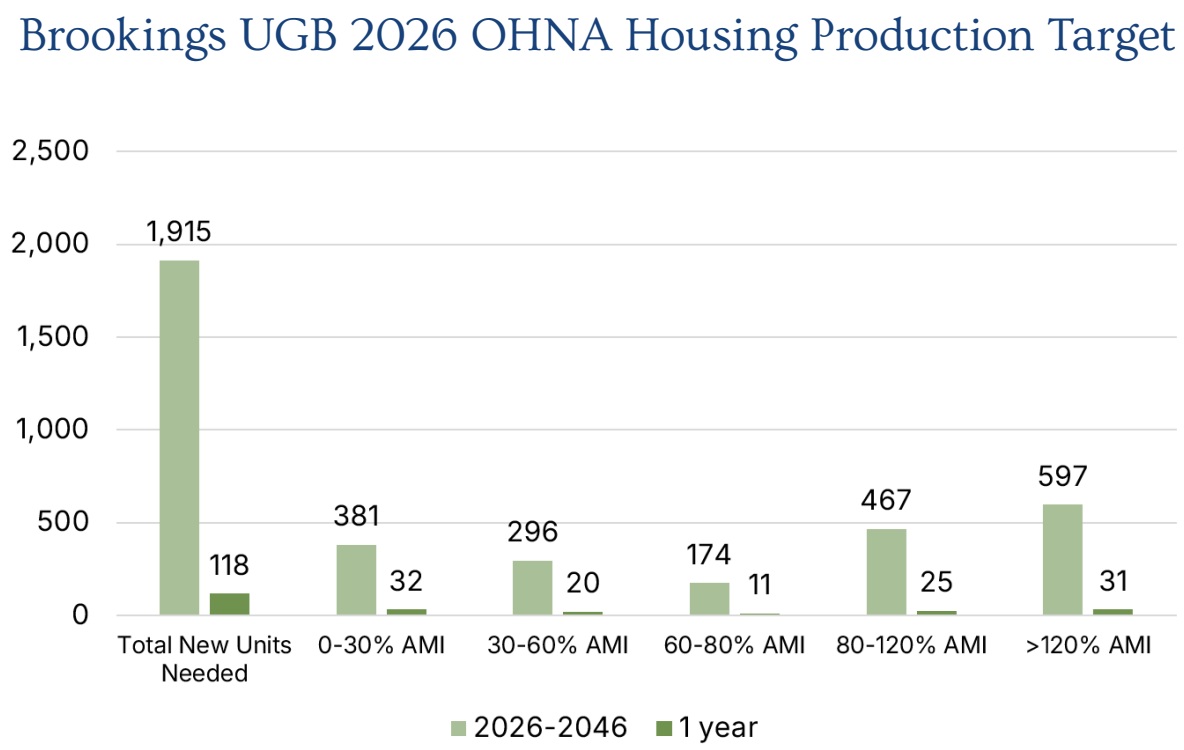


Figure 1-3: Oregon Housing Needs Analysis, City of Brookings Annual Housing Production Targets by Standard Income Groups

INCOME

At nearly $75,000/year (according to the American Community Survey, 2020-2024 5-year Estimate), Brookings has the highest median household income within the peer group, followed by Curry County as a whole. The Brookings median income is somewhat lower than the statewide median household income. Closer to home, median household income in Harbor is nearly $20,000 lower than in incorporated Brookings, again suggesting potential unmet demand for housing that is affordable to middle- and lower-income households.



Regional Peers Median and Mean Household Income		
Geography	**Median HH Income ($)**	**Mean HH Income ($)**
Oregon	$83,011	$111,542
Curry County, OR	$62,244	$82,583
Brookings city, OR	$74,933	$91,223
Harbor CDP, OR	$55,109	$71,740
Bandon city, OR	$48,187	$73,767
Coos Bay city, OR	$56,524	$74,079
Crescent City, CA	$35,540	$60,544

Table 1-3: Regional Peers Median and Mean Income Comparison. Data Source Household Income, American Community Survey, S1901, 2020-2024 5-Year

Table 1-4 shows income ranges for the "standard" income groups for Brookings as used by the Oregon Housing Needs Analysis in its housing production targets. A little more than a third of households earn less than $50,000/year, which roughly corresponds with the upper income threshold for the 60-80% AMI income group. In other words, approximately 30% of households in Brookings earn less than roughly $60,000 (80% of AMI).

Brookings Household Income by Standard Group	
Standard Income Group	**Upper Income Threshold for Group**
0 – 30%	$22,480
30 – 60%	$44,960
60 – 80%	$59,946
80 – 120%	$89,920
>120%	∞

Table 1-4: Brookings Housing Income by Standard Household Income Group. Data Source Household Income, American Community Survey, S1901, 2020-2024 5-Year. Calculations by Green Top PDR.

Often referred to as "middle income", another 30% of households fall roughly into the 80-120% income group. Consistent with the OHNA Housing Production Target, 36% of households (a relatively large percentage) fall into the "over 120%" group.

Brookings (city)				
Income Range	**Total Households**	**% Total Households**	**Total Households by Income Category**	**% Households by Income Category**
Less than $10,000	75	2.5%	394	13.20%
$10,000 to $14,999	15	0.5%		
$15,000 to $24,999	305	10.2%		
$25,000 to $34,999	251	8.4%	591	19.80%
$35,000 to $49,999	341	11.4%		
$50,000 to $74,999	508	17.0%	508	17.0%
$75,000 to $99,999	415	13.9%	415	13.9%
$100,000 to $149,999	547	18.3%	1,075	36.00%
$150,000 to $199,999	251	8.4%		
$200,000 or more	278	9.3%		

Table 1-5: Brookings Detailed Income Distribution. Data Source: Household Income, American Community Survey, S1901, 2020-2024 5-Year Estimate

AGE

At 50.6 years, Brookings is older than the statewide median, but considerably younger than Curry County overall. Harbor, on the other hand, is significantly older than both with a median age of 68.2 years.

Median Age	
Location	**Median Age**
Oregon	40.4
Curry County, Oregon	57.7
Brookings, Oregon	50.6
Harbor CDP, Oregon	68.2
Gold Beach, Oregon	54.7
Port Orford, Oregon	62.7
Crescent City, California	38.4

Table 1-6: Median Age in Brookings and Area Communities. Data Source: 2020-2024 ACS 5-Year Estimates Detailed Tables, Table B01002

Although median age provides a glimpse at an important demographic factor that affects housing need, a closer look at age distributions within these communities reveals a more complex picture.

Even with a median age that is 10 years older than the statewide median, Brookings has the highest percentage of school aged children of any of its neighbors (nearly 18% of Brookings population is under 18), including Crescent City. In terms of housing, this suggests that there will be demand for single unit, detached housing with substantial private outdoor space for some time to come.

Brookings, however, has the lowest percentage of young adults (18-24). More young adults live in Harbor in both proportional and absolute terms: nearly 12% of Harbor residents, 283 in total, are between 18 and 24. Members of this cohort may be in college or other post-secondary education or training, and are more likely to have lower incomes. They are less likely to be in a position to own a home. As renters with lower incomes, their housing preferences are likely driven by value more than any factor. This may explain why a higher percentage of young adults live in Harbor, where average rents are lower, than in Brookings.

Brookings has a high percentage of adults between the ages 25 and 44—27% of its total population. This is consistent with the statewide average (28%), but much lower than Crescent City where 40% of the population falls into these age categories. Households at the younger end of this group (25 – 34) are often entering the workforce, beginning careers, and forming families. Just as their lives are transitioning into adulthood, their housing preferences are evolving. They usually have not reached their highest earning potential, and between limited opportunities to build personal savings and financial liabilities like student loan debt, they are much less likely to be in a position to enter into homeownership. Waiting longer to form family households, they may be less likely to need or desire larger homes with yards. By the time they enter the 35-44 age group, they are deeper into careers, benefiting from higher wages, and are more likely to have younger children. All of these factors influence housing preferences.

Nearly 27% of Brookings' population is aged 45 – 64. This is slightly higher than the statewide and county averages. Fewer members of this age group live in Harbor, but they still represent nearly 22% of Harbor's total population. Individuals in this category are much more likely to have formed family households than their younger counterparts and they have reached the period in their careers with the highest earning potential. Those with school aged children are more likely to have the resources and desire to live in single unit detached homes with yards. As they retire and their children leave home, they may downsize, creating opportunities for younger households to move out of smaller units as they try to accommodate growing families. In order for this occur, however, older households need to be able to find smaller units of their own or leave the community altogether.

A larger proportion of Brookings residents are retirement age (65+) than the statewide average (26% vs. 19%), but the proportion of individuals in this age group in Brookings is much smaller than Curry County overall where nearly 37% of the population is 65 or older. In Harbor, 56% of the population are members of this age group. More significantly, 25% of Harbor residents are at least 75. This is consistent with the large difference in median household size between Brookings and Harbor.

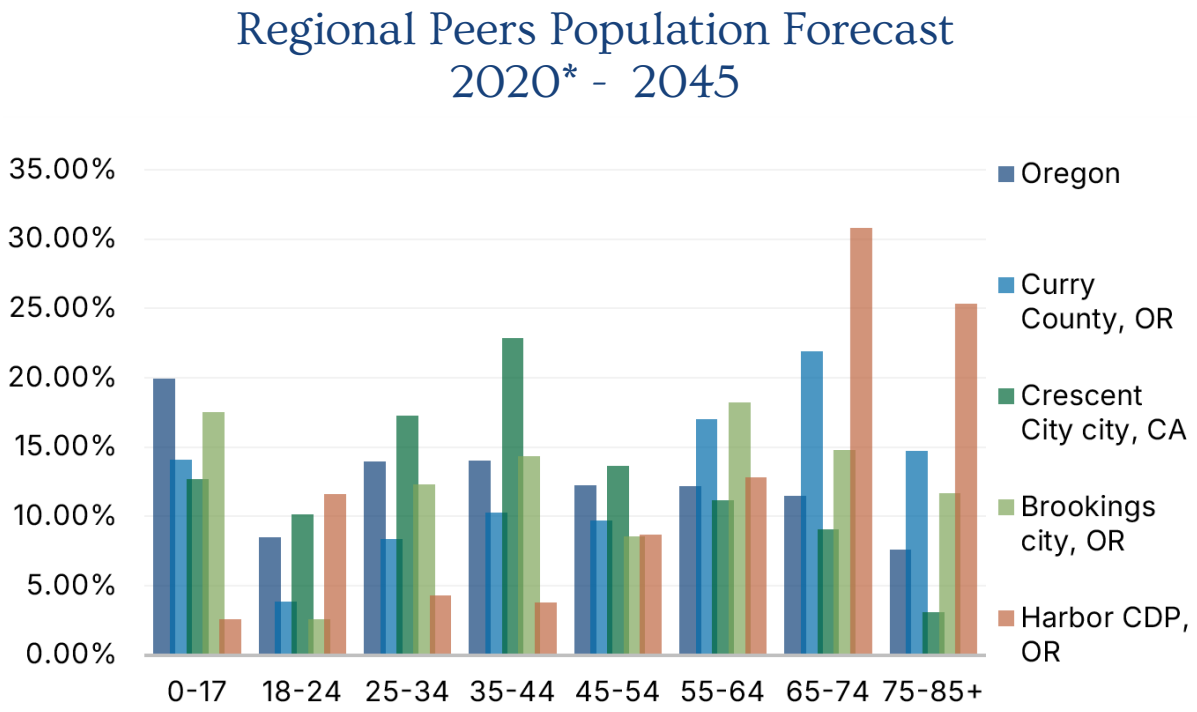


Figure 1-7: Age Cohorts for Brookings and Surrounding Communities. Data Source: 2020-2024 ACS 5-Year Estimates Detailed Tables, Table B01002

HOUSEHOLD SIZE

As Table 1-4 demonstrates, Brookings' household size is comparable to other peer communities, but at 2.19 person per household, it is much larger than the average household size for Harbor (1.74). This suggests that housing demand in Harbor may tend toward smaller units, which is consistent with age data presented previously.

Geography	Total Households	Median Household Size
Oregon	1,718,422	2.42
Curry County, OR	11,159	2.07
Brookings city, OR	2,987	2.19
Harbor CDP, OR	1,388	1.74
Bandon city, OR	1,831	1.78
Coos Bay city, OR	6,978	2.21
Crescent City, CA	1,693	2.26

Table 1-7: Regional Peers Median Household Size. Data Source Household Income, American Community Survey 2020-2024 5-Year Estimate Table S1101.

RACE AND ETHNICITY

The racial and ethnic composition of a community, like age, can influence housing demand and inform housing policy. Housing affordability, for example, can impact different groups of people in different ways. Changes in homeownership patterns may likewise occur within different racial and ethnic groups. A 2025 report by the National Association of Realtors states that "While homeownership rates have improved across all racial and ethnic groups over the past decade, some groups continue to lag behind."[4] According to the report, homeownership among white households in Oregon is slightly above the current overall rate of homeownership nationally (67% and 65.24%, respectively), while the rate of homeownership among black Oregonians was 30%.[5] Asian households in Oregon reported homeownership rates close to the national average (62%).[6] Hispanic households have experienced significant growth in homeownership nationally. In Oregon, 47% of Hispanic households own a home.[7]

As depicted in Figure 1-8, even as the percentages of most racial and ethnic minority groups have remained stable since 2016, the percentage of the population identifying as "some other" or "two or more races" has grown quickly across the state and within the communities considered in this study, accounting for approximately 12% of the population in Curry County, Brookings, and statewide. This change is partially attributable to the way survey questions are asked, but also represents actual demographic change.

Data from the American Community Survey demonstrates that Oregon, Curry County, Brookings, and Crescent City are becoming increasingly diverse, although at different rates and in different ways.

4 2025 Snapshot of Race and Home Buying in America, National Association of Realtors, p. 6
5 Ibid., pp. 10, 11
6 Ibid., p. 12
7 Ibid., p. 13

Race and Ethnicity, 2016 - 2024

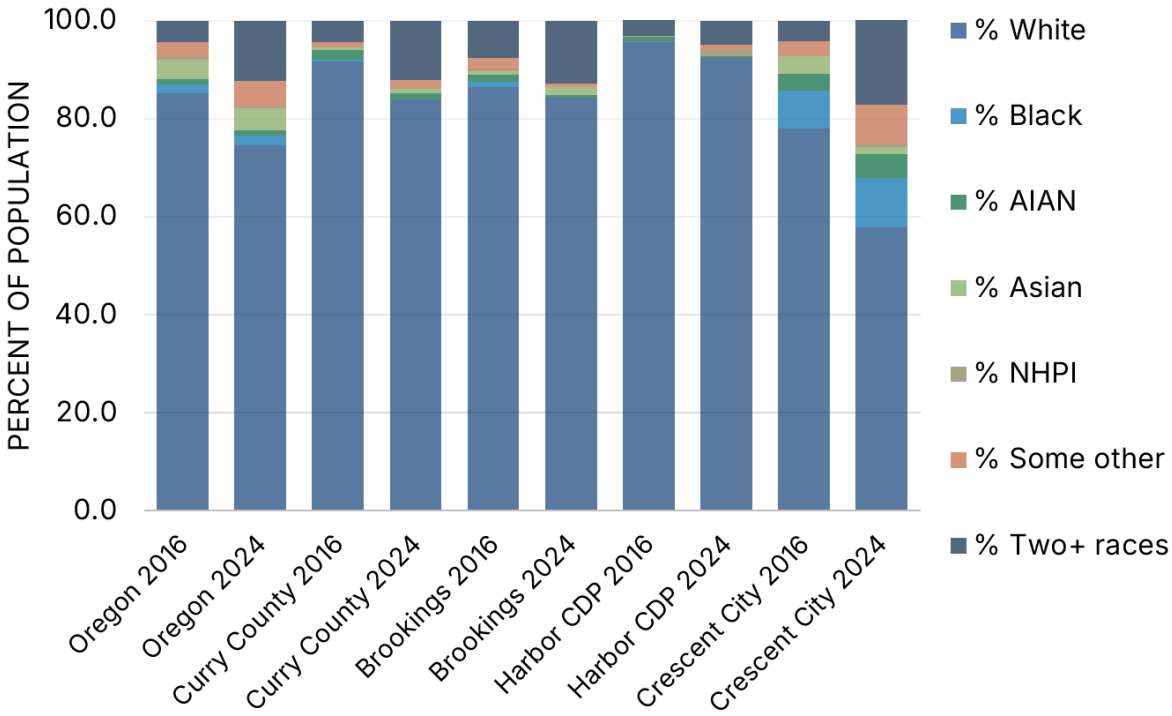


Figure 1-8: Race and Ethnicity for Brookings and Surrounding Area, 2016 - 2024. Data Source: 2012-2016 ACS 5-year Estimate, Table DP05; 2020-2024 ACS 5-Year Estimates Detailed Tables, Table DP05.

The number of individuals reporting Hispanic ethnicity has grown faster in Curry County overall than it has in Brookings where it increased by 0.8% from the 2012-2016 5-year Estimate to the 2020-2024 5-year Estimate. The percentage of Brookings' overall population reporting Hispanic ethnicity has however, remained much higher than Curry County (nearly 11% and nearly 8%, respectively). Crescent City saw a significant contraction in its Hispanic population according to the ACS, shrinking from nearly 36% to 28% between 2016 and 2024.



HOUSING AFFORDABILITY

Housing affordability is, fundamentally, the relationship between two factors: the cost of housing and the ability to pay for it. At $446,700 according to the 2020-2024 5-Year ACS Estimate, Brookings has the highest median home value within its immediate area (Table 9). It is only slightly lower than the state average, and significantly higher than Curry County overall and Harbor, where the median home value is 70% of that in Brookings city limits ($316,000). Brookings' median home value is similarly high compared to Crescent City ($306,500).

Median home values reported by the Census Bureau are based on survey data, and do not reflect current home sales prices. By the end of 2025, the average monthly median sale price for a home in Brookings was $516,146 according to data from Redfin.[8] That is about $4,000 higher than the statewide Annual Average Monthly Median Home Sale Price of $512,650. This represents a high point over the past 10 years for both metrics. Figure 7 shows a steady and relatively steep price escalation during that period when prices increased by over $245,000 from an Average Annual Monthly Median for Brookings of $270,569 in 2015. Since 2015, home prices have increased at an annual average rate of 7%. The most significant increases occurred between 2019 and 2020, and between 2021 and 2022 when the average annual median monthly price rose by 13% during both periods.



"I make 'good money' according to most people's estimations. I am still entirely unable to afford a home in this area. In six years, the rent of my one-bedroom apartment has gone from $1,200 to over $1,600, while my income has not risen accordingly."

HNA Survey Respondent

8 Redfin processes data collected from multiple listing services and calculates a median home sale price for each month. Green Top PDR averaged those data to calculate an "Average Annual Monthly Median Home Sale Price" for each of the past 10 years, in other words the average price of a home for an entire 12 month period. Averaging the median home sales price is intended to remove seasonality and monthly anomalies.

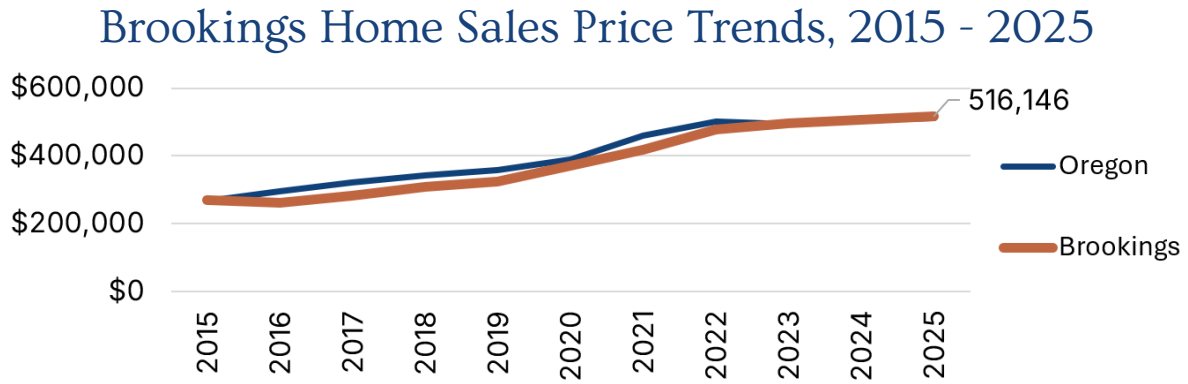


Figure 1-9: Annual Average Median Monthly Home Sales Prices. Data Source: Redfin Data Center. Calculations and analysis by Green Top PDR.

Renters in Brookings pay the most among regional peer communities, nearly as much as the statewide average (Table 1-5). According to the most recent available data from the Census Bureau, Median Gross Rent is just over $1,400, while renters in Harbor pay nearly $1,200—similar to the Median Gross Rent for Curry County overall and Crescent City.

Connecting cost and income, cost burden measures number of households that pay more than 30% of their income toward housing costs.[9] The percentage of homeowner households in Brookings that pay more than 30% of their pretax income toward housing is higher than the statewide average of 25%, and comparable with Curry County overall and Crescent City (between 26-28%). Home values in both Curry County and Crescent City are significantly lower suggesting that households with lower incomes are, perhaps, able to find homeownership opportunities that are relatively more affordable in those communities. Homeownership in Harbor, however, appears to be less affordable with slightly more than 34% of homeowner households experiencing cost burden.

Geography	Median Home Value	% Owners Paying more than 30%
Oregon	$477,600	25.1%
Curry County, OR	$381,300	27.6%
Brookings city, OR	$446,700	26.7%
Harbor CDP, OR	$316,600	34.4%
Crescent City, CA	$306,500	25.96%

Table 1-8: Homeowners Housing Cost Burden. Data Source: American Community Survey, Tables B25140 and DP04, 2020-2024 5-Year Estimate. Calculations and analysis by Green Top PDR.

As is true throughout Oregon and the United States, cost burden in and around Brookings affects renter households much more frequently than homeowner households. Fewer renter households are cost-burdened in Brookings than throughout the state and Curry County overall, but nearly 40% of renter households in Brookings pay more than 30% of their pretax gross income toward housing costs. Cost burden is much more common in Harbor where nearly 55% of renter households are cost burdened, similar to Crescent City where 52% of renter households are cost burdened. In both of these communities, Median Gross Rent is lower than it is in Brookings, and considerably lower than the statewide median, but household incomes in Harbor and Crescent City are also comparatively lower, demonstrating the powerful impact of income on affordability.

9. Cost burden is the most commonly used measure of rental housing affordability but is often used as a more generalized measure of housing affordability for homeowner housing as well. It compares housing cost with household income, establishing an income to housing cost threshold of thirty percent (30%). If a household spends more than 30% of its income on housing, it is said to be rent or cost burdened. There are many criticisms of cost burden as a measure of affordability. It is thought to underestimate the financial impact (burden) of housing costs on the poorest households. Whatever the case, it remains a commonly used metric of housing affordability that uses readily available public data. For more discussion see "Rental Burdens: Rethinking Affordability Measure", HUD User Office of Policy Development and Research, https://www.huduser.gov/portal/pdredge/pdr_edge_featd_article_092214.html

Renter Housing Cost Burden		
Geography	**Median Gross Rent**	**% Renters paying 30% or more of pretax income**
Oregon	$1,525	49.5%
Curry County	$1,241	43.5%
Brookings	$1,415	39.0%
Harbor CDP	$1,190	54.8%
Crescent City	$1,192	52.3%

Table 1-9: Renter Housing Cost Burden. Data Source: 2020-2024 5-year American Community Survey Estimates, Tables B25140, calculations and analysis by Green Top PDR.

Renter cost burden is experienced differently by renters in different income groups. Renter households earning more than $75,000 (slightly more than 100% of Household AMI for Brookings) did not report cost burden. At the other end of the income continuum, renters earning less than $35,000 (less than 50% of AMI) report experiencing rent burden most of the time (Figure 1-10).

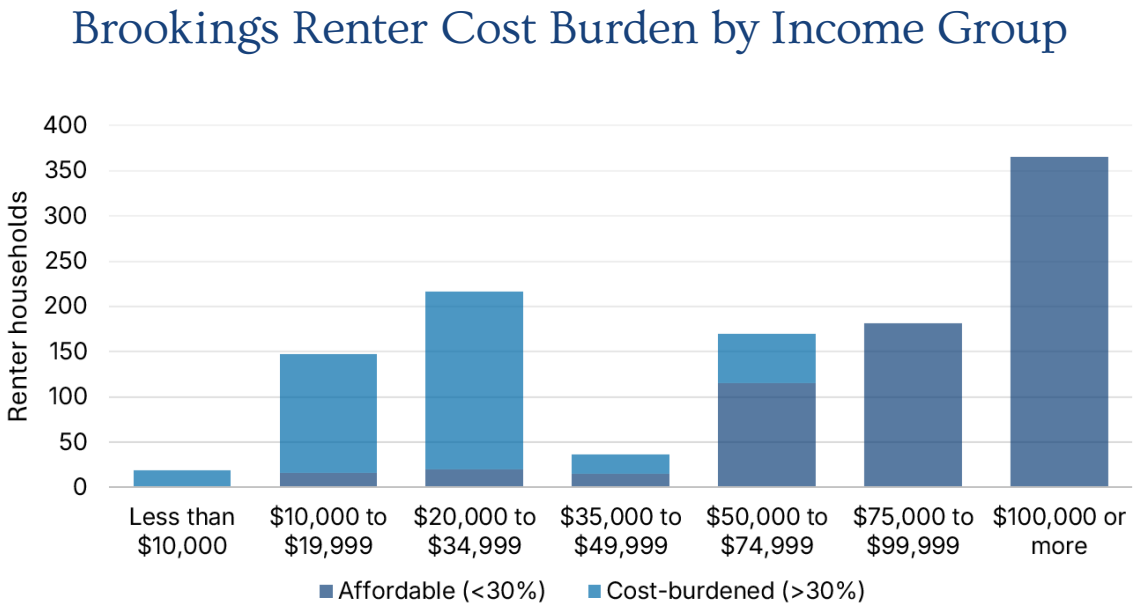


Figure 1-10: Brookings Renter Cost Burden by Income Group. Data Source: 2020-2024 5-year American Community Survey Estimates, Tables B25122, calculations and analysis by Green Top PDR.

HOMELESSNESS

Although other factors contribute to and exacerbate homelessness, housing affordability and availability are a primary cause. When lower and moderate-income households (those earning under 60% of median household income) are faced with rent burden, they can experience housing insecurity. As mentioned above, over 50% of renters in Crescent City and Harbor pay more than 30% of the pre-tax household income toward housing. Although the rate of renter cost burden is lower in the City of Brookings and Curry County overall, around 40% experience cost burden. For these households, sudden financial hardship and life-changing events can cause them to lose their housing temporarily or for long periods of time, sometimes precipitating chronic homelessness.

When lower and moderate-income households are faced with rent burden, they can experience housing insecurity and the possibility of losing stable housing.

Table 1-7, summarizes Point-in-Time (PIT) and Housing Inventory Counts. In Curry County, the vast majority of homeless individuals surveyed during the PIT Count were unsheltered (93%), meaning that they were living in a place "not meant for human habitation."[10] According to the 2025 Oregon Statewide Homelessness Estimate, 93 school children in Curry County were reported to have experienced some kind of homelessness (sheltered, unsheltered, "doubled-up", living in short term rentals, etc.) during the school year.

2025 Houselessness Estimates			
County	**Sheltered**	**Unsheltered**	**Total**
Curry County	14	190	204
Coos County	140	315	455
Oregon (state total)	10,607	16,512	27,119

Table 1-10: 2025 Houselessness Estimates. Data Source: 2025 Oregon Statewide Homelessness Estimates, January 2026, Oregon Housing and Community Services. Data includes Point-in-Time Counts and Housing Inventory Counts.

According to 2025 Oregon Statewide Homelessness Estimates produced by the Oregon Department of Housing and Community Services (OHCS), Curry County had a "County Homeless Rate" of 8.6/1,000 residents, slightly higher than Coos County at nearly 7/1,000.

High rates of homelessness are not uncommon among coastal counties: in 2025, Clatsop County had the highest rate of homelessness at nearly 30/1,000, and Lincoln County had a rate of 12/1,000. As Figure 9 shows, Curry and Coos Counties have seen lower estimates from highs in 2024, while estimates for Clatsop and Lincoln Counties have either leveled off or continue to grow. It is important to understand that estimates are based, in part, on Point in Time Counts (PIT) that are known to have limited accuracy due to methodological variations.

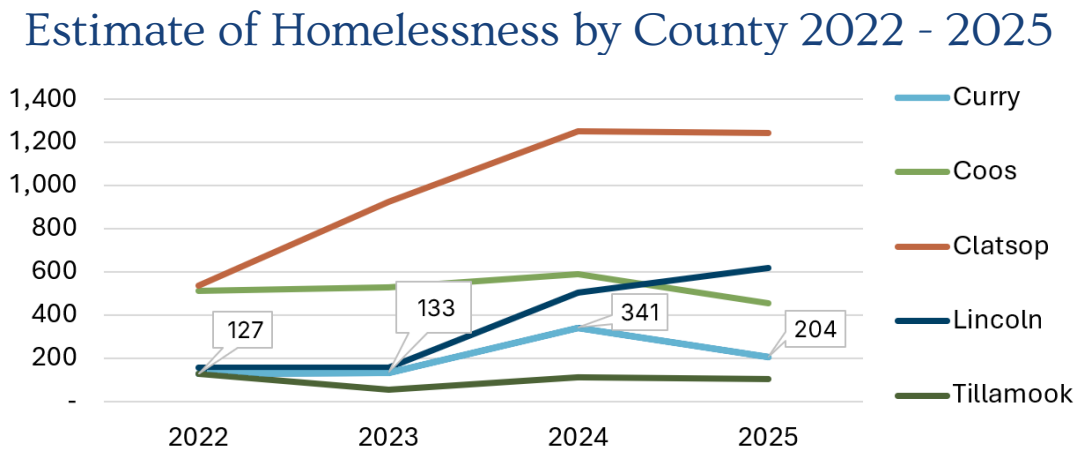


Figure 1-11: Estimate of Homelessness by County, 2022 - 2025. Data Source: Oregon Statewide Homelessness Estimates 2022, 2023, 2024, and 2025[11] Analysis and data aggregation by Green Top PDR.

10. As defined by Department of Housing and Urban Development
11. Ibid., PSU Homelessness Research & Action Collaborative

Other data, including McKinney-Vento reporting by school districts, are used in the annual estimates to augment PIT counts, providing a more comprehensive picture of those experiencing different types of houselessness. According to the 2025 Oregon Statewide Homelessness Estimate, 93 school children in Curry County were reported to have experienced some kind of homelessness (sheltered, unsheltered, "doubled-up", living in short term rentals, etc.) during the school year, a nearly 23% reduction from the previous school year.[12]

PEOPLE WITH DISABILITIES

Physical, emotional, and cognitive disabilities influence demand for housing in a couple of different ways. Homes can be designed and constructed to better meet the needs of those with disabilities. Mobility challenges, for example, can be addressed with zero threshold showers, zero step entries, wider hallways that accommodate mobility devices, single story home designs, etc. As populations age, these considerations become more and more important.

Disabilities can also increase vulnerability to housing instability and homelessness. People with intellectual and developmental disabilities, for example, are disproportionately represented among people experiencing homelessness, especially chronic homelessness.[13]

According to data from the American Community Survey 2024 5-Year Estimate, the incidence of various kinds of disabilities is higher in the City of Brookings than it is nationally or across Oregon. The percentage of people with disabilities in Harbor is even higher: at over 25%, it is nearly double the national average of 13%.

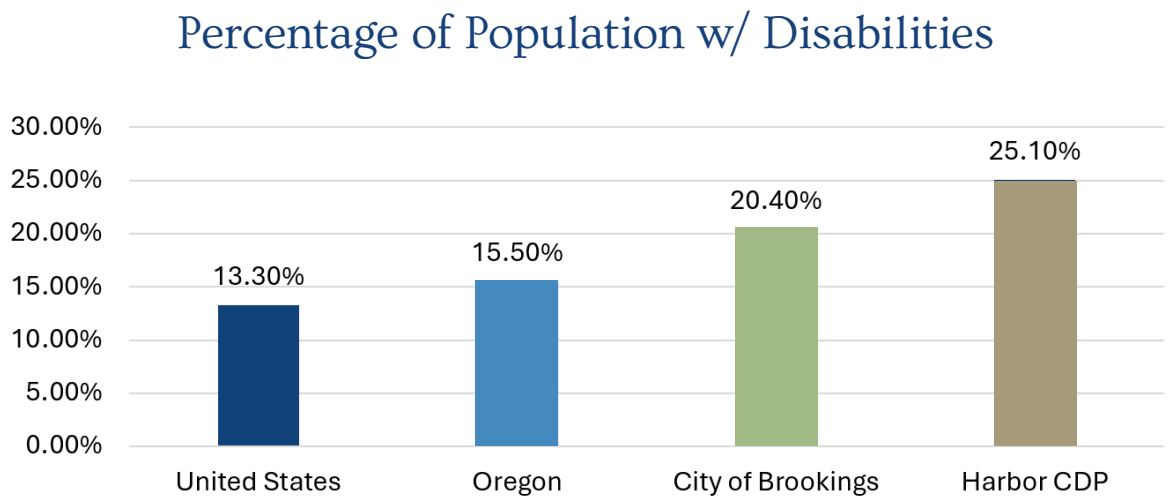


Figure 1-12: Percentage of People with Disabilities. Data source: 2020-2024 5-year American Community Survey Estimates, Table S1810.

12. Ibid, p. 47
13. Thurman et al, 2023. The Intersection of Intellectual/Developmental Disability and Homelessness From the Perspectives of Service Providers, Qualitative Health Research, Volume 33, pages 1017-1029.

Chapter 2. Residential Buildable Lands Inventory

Oregon Statewide Planning Goal 10 requires that "Buildable lands for residential use shall be inventoried" in order to support the provision of adequate housing throughout the State of Oregon.[14] A residential buildable lands inventory (RBLI) provides an assessment of the current development status of lands that are designated in a community's comprehensive plan for residential use and/or zoned for that purpose. Simply put, it identifies lands that are available for the development of new housing; lands that are already developed and cannot accommodate additional development; and lands that cannot be developed due to various types of constraints. Importantly, the RBLI captures the development status of residential land at one point in time. Although BLIs could be constantly updated, as a part of a city's comprehensive plan and a foundational planning document they are static.

In the context of long range comprehensive planning, the RBLI provides a foundation for further investigation of a community's capacity to accommodate future population growth. It is an essential component of a Housing Capacity Analysis or Housing Needs Analysis, but does not itself assess the number of homes that could be developed on lands it determines to be developable. Nor does an RBLI propose policy interventions that may address deficiencies in the provision of housing for a community's current and future residents. The aforementioned tasks are undertaken in subsequent parts of this study.

The manner in which an RBLI is produced is largely prescribed by state statute and administrative rule. In particular, administrative rules 660-008-0005, 660-008-0100, 660-024-0050, 660-038-0060, 660-038-0070, as well as ORS 197A.270 and ORS197A.280, establish requirements and standards for RBLIs. For example, lands that are described in an inventory as "partially vacant" are defined by rule. Rules were translated into a series of geoprocessing tasks using industry standard geospatial information systems software, ESRI ArcPro. Resulting data is stored in a geodatabase, allowing for future analysis and investigation. Despite the highly prescriptive nature of these rules, there are instances that require discretion and allow for the application of local knowledge to determine whether a property is fully developed or has capacity for additional residential development.

KEY FINDINGS

- The RBLI documented 4,870 individual properties in the UGB (City of Brookings and unincorporated Curry County including Harbor) that are zoned for residential uses or currently have a residential use despite not being zoned or planned for a residential use.[15] These residential properties cover 4,342 acres.

- 83% of residential properties in the UGB are fully developed or otherwise unbuildable.[16] These properties, however, cover only 59% of the total residential land in the UGB.

- After accounting for environmental development constraints, the RBLI documented 704 acres of buildable residential land within the UGB or 16.2% of the 4,342 acres currently zoned for or in residential use.

- With nearly 500 acres, most residential land available for development in the UGB is vacant (70% of the 704 developable residential acres). By comparison, the vacant, developable portion of partially vacant residential land (residential land with an existing residence that is zoned to allow residential uses) totals nearly 213 acres representing about 30% of developable residential land in the UGB.

- Nearly 407 acres or 58% of all residential land available for development is located within

14. OAR 660-015-0000(10)
15. Properties with an existing residential use that are not zoned to allow residential use are included in the inventory for the purposes of accounting for current capacity of land within the Brookings UGB to accommodate housing. These properties are not assumed to any additional capacity to accommodate future population growth.
16. Residential lands with no or relatively little development that were mostly constrained by environmental conditions or regulations were placed in the "Developed" category.

Brookings' city limits. Land in the Lone Ranch Master Plan Area accounts for more than half of this. The remaining 297 acres or 42% of all residential land available for development is located in unincorporated Curry County.

- Altogether, 2,459 acres of residential land are constrained by environmental conditions such as steep slopes or the presence of wetlands and riparian areas. Steep slopes and related environmental constraints represented the most prevalent and impactful environmental constraint. Slopes 25% and steeper, for example, affected 1,621 acres of residential land in the UGB.

STATUTORY AUTHORITY AND APPLICABLE ADMINISTRATIVE RULES

As mentioned above, the authority and standards for Residential Buildable Land Inventories can be found in several places in state statute and administrative rule. ORS 197A.280(3)(b) requires cities with a population of less than 10,000 to "Inventory the supply of buildable land available within the urban growth boundary to accommodate needed housing [...]." OAR 660-024-0050(1) further clarifies that local governments must create an inventory to "determine whether there is adequate development capacity to accommodate 20-year needs [...]". The development capacity of lands in the inventory is analyzed separately in Technical Memorandum 3: Residential Capacity.

Inventories consist of several different categories[17] of land where housing has or can be developed.

These include

1. Vacant
2. Partially vacant
3. Redevelopable
4. Developed
5. Unbuildable

OAR 660-024-0050 requires that the inventory is "conducted in accordance with OAR 660-008-0100 [...]", which defines the required contents of the inventory and methods for creating it. OAR 660-008-0100(2) requires that an RBLI "document the amount of buildable land in each plan designation[18] that allows residential use under clear and objectives standards [...]." Residential land designated by a comprehensive plan or land zoned to allow residential development are categorized and quantified below in the "Residential Land Base" section.

METHODOLOGY

Pursuant to the aforementioned statutes and administrative rules, the following methodology was used to generate this RBLI:

1. Create a residential "land base" consisting of all properties that are zoned to permit residential development.[19]

2. Remove otherwise developable residential land from the inventory that subject to natural hazards, natural resource protections, has steep slopes, is within a "100-year flood plain or floodway", or "cannot be provided with public facilities."[20]

3. Determine the development status of these lands as "vacant", "partially vacant", "redevelopable", unbuildable/undevelopable, and developed.[21]

4. Tabulate remaining residential land available for development.

RESIDENTIAL LAND BASE

All residential lands in Brookings' UGB were considered in this RBLI. There are 2,694 acres (4.2 square miles) in Brookings current city limits. However, its Urban Growth Boundary is nearly three times as large with 7,740 acres (12 square miles). Within the UGB, there are more than 5,500 tax lots, of which nearly 4,900 have an existing residential use or are zoned[22] residential, covering 4,342 acres of the Brookings UGB.

17. OAR 660-024-0050(1) identifies the first three types of "development status" measured in this RBLI. "Developed" and "Unbuildable" categories are described throughout OAR 660-008 and 660-038.
18. Although this rule mentions comprehensive "plan designations", OAR 660-008-0005(7) provides a broader definition that includes lands "zoned to allow residential use". Zones are used in this RBLI for properties under city and county jurisdiction.
19. OAR 660-008-0100(2) requires that an RBLI must "document the amount of buildable land in each plan designation that allows residential use under clear and objective standards [...]".
20. OAR 660-008-0005(7)(a) –(e)

All acreages in this study—tax lots, development constraints, jurisdictional boundaries and the UGB—were calculated directly in GIS rather than drawn from published sources which report differing acreages for both city limits and UGB. All layers were analyzed in the NAD 1983 HARN Stateplane Oregon South coordinate system (FIPS 3602), international feet.

Based on estimated density calculations, each zone was then placed into Low, Medium or High density categories depending on where they fell within the following ranges:[23]

- Low Density, eight (8) or fewer units/acre
- Medium Density, nine (9) to 16 units/acre
- High Density, more than 16 units/acre.

These densities were calculated based on regulations and should not be confused with "observed densities" described in the capacity section of this HNA.

Zones that allow residential uses with clear and objective standards[24] are identified in Table 1. In the City of Brookings, residential development is permitted with clear and objective standards in 15 zones, including three commercial zones: Professional Office, General Commercial, and Tourist Commercial where residential uses are only permitted on second and higher stories. Zones where residential development is permitted through a discretionary land use process (for example a Conditional Use Permit) were not included in the inventory.

Brookings Residential Zones and Maximum Estimated Densities

Zone	Min. Lot Size (square feet)	Min. Lot Size (Acre)	Max. DU/unit of land	Max. DU/acre (net)	RBLI Density Category
SR 20,000	20,000.00	0.46	1.00	2.18	Low
SR 40,000*	40,000.00	0.92	1.00	1.09	Low
R-1-6	6,000.00	0.14	1.00	7.26	Low
R-1-8	8,000.00	0.18	1.00	5.45	Low
R-1-10	10,000.00	0.23	1.00	4.36	Low
R-1-12	12,000.00	0.28	1.00	3.63	Low
R-MH-6	6,000.00	0.14	1.00	7.26	Low
R-MH-8	8,000.00	0.18	1.00	5.45	Low
R-MH-10	10,000.00	0.23	1.00	4.36	Low
R-MH-12	12,000.00	0.28	1.00	3.63	Low
R-2	6,000.00	0.14	2.00	14.52	Medium
R-3	6,000.00	0.14	4.00	19.36	High
PO-1	6,000.00	0.14	None	48.40	High
C-3	None	None	None	48.40	High
C-4	None	None	None	48.40	High

Table 2-1: City of Brookings Residential Zones and Maximum Estimated Densities. Note: None of the commercial zones sets a maximum residential density. For the purposes of the RBLI, maximum residential density for these zones was estimated by assuming that a three story mixed use building could be built within the maximum height, covering 50% of a lot, with 900 square foot units.

* No properties with an SR 40,000 zone were identified.

21. OAR 660-008-0005(7) identifies these categories of "buildable land".
22. Some properties have multiple zones. So-called "split" zoned properties in this RBLI have a "primary zone" that is residential.
23. Density ranges are consistent with OAR 660-038-0060(1)(b)(B)
24. For the purposes of this RBLI, "clear and objective" is understood to be synonymous with "permitted" or "permitted by right". Zones wherein residential uses or development are only allowed with a conditional use permit or other discretionary entitlement were not considered to meet this standard.

Table 2-1 summarizes the residential land base using these regulatory density ranges. Most of Brookings residential land base is zoned within the "Low" density range of fewer than eight (8) dwelling units/net acre, with R-1-6 the single largest zone in terms of number of lots and area; R-MH is the smallest in area.

City of Brookings Residential Land Base by Zone				
Jurisdiction	**Zone**	**Residential Tax Lots in Zone**	**Total Area in Zone (Acres)**	**Residential Use Category (Low/Med/High)**
Brookings	R-1-10	51	26.09	Low
Brookings	R-1-12	7	31.75	Low
Brookings	R-1-6	1,736	630.05	Low
Brookings	R-1-8	19	12.23	Low
Brookings	R-MH	49	10.03	Low
Brookings	SR-20	112	71.35	Low
		1,974	**781**	
Brookings	MPD	4	549.07	Medium*
Brookings	R-2	600	243.99	Medium
		604	**793**	
Brookings	C-3	40	10.71	High
Brookings	C-4	7	20.79	High
Brookings	PO-1	0	0.00	High
Brookings	R-3	216	128.28	High
		263	**160**	

Table 2-2: City of Brookings Residential Land Base by Zone. Data sources: City of Brookings, Curry County, Lane Council of Governments. Calculations and analysis by Green Top PDR.

* The MPD zone consists entirely of the Lone Ranch planned community. Density was calculated at 7.94 DU/gross acre across the entire plan area based on plans approved by the City of Brookings in 2006.

Table 2-3 further summarizes this data and provides comparisons to the total residential land use base within Brookings' city limits. A little more than 45% of Brookings residential land base is located within zones that permit residential development at low densities (under eight units/net acre). This slightly underrepresents low density land in the overall inventory, because the Lone Ranch PUD includes a significant low density residential component (540 planned single detached units on 93 net acres). Likewise, although medium and high density residential land account for only 14% and 9% of the land base, respectively, Lone Ranch is also planned to include 150 single attached units (medium density) on 11 acres and 310 units on 22 acres (high density). Lone Ranch's overall planned residential density is nearly eight (8) units/net acre, placing it in the medium density category.



City of Brookings Residential Land Base Summary				
Residential Land Density Category	**Residential Taxlots in Zone**	**% Total Residential Taxlots**	**Total Area in Category (Acres)**	**% Total Residential Land Area**
Low	1,974	69.48%	781	45.06%
Medium	600	21.12%	244	14.07%
Lone Ranch PUD	4	0.14%	549	31.66%
High	263	9.26%	160	9.21%
	2,841		**1,734**	

Table 2-3: City of Brookings Residential Land Base Summary. Data Source: City of Brookings, Curry County, Lane Council of Governments, calculations and analysis by Green Top PDR.

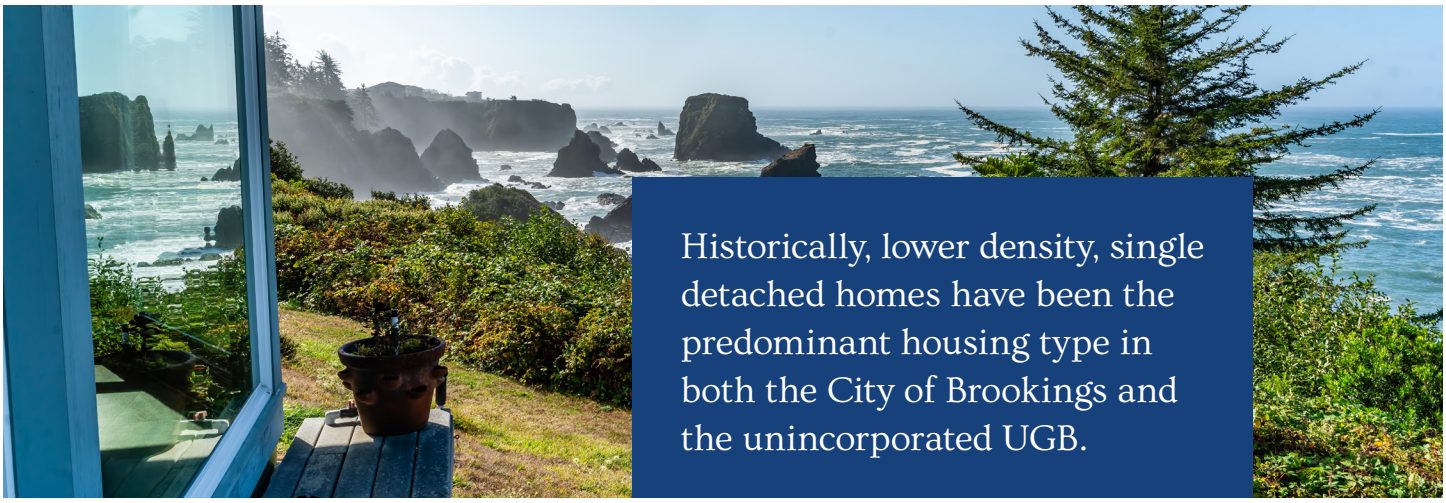
These proportional shares of residential land are consistent with current housing inventory data reported in TM1, which found that nearly 61% of Brookings households live in a single detached home; nearly 14% live in a single attached home; roughly 16% live in middle housing (multi-unit developments with fewer than 10 units; and nearly 8% live in multi-unit developments with ten units or more).

Residential lands in Brookings' unincorporated Urban Growth Boundary (UGB) are also inventoried in the RBLI. Most of these properties are located in the more densely developed Harbor area. Curry County has ten (10) zones in Brookings' unincorporated UGB that allow residential development with clear and objective standards (Table 2-4, Curry County Residential Zones and Densities).

Curry County Residential Zones and Maximum Estimated Densities				
Zone	**Min. Lot Size (square feet)**	**Min. Lot Size (Acre)**	**Max. DU/acre (net)**	**RBLI Density Category**
R-1	6,000.00	0.14	7.26	Low
R-2	6,000.00	0.14	14.52	Medium
R-3	6,000.00	0.14	21.78	High
RCR-1	43,560.00	1.00	1.00	Low
RCR-2.5	108,900.00	2.50	0.40	Low
RCR-5	217,800.00	5.00	0.20	Low
RCR-10	435,600.00	10.00	0.10	Low
RR-5	217,800.00	5.00	0.60	Low
RR-10	435,600.00	10.00	0.10	Low
C-1	6,000.00	0.14	43.56	High

Table 2-4: Curry County Residential Zones and Maximum Estimated Densities. Note: None of the commercial zones sets a maximum residential density. For the purposes of the RBLI, maximum residential density for these zones was estimated by assuming the most dense housing type permitted that could reasonably be developed was built on a minimum sized lot or other regulatory unit of land.[25]

Table 2-5 summarizes the residential land base in the unincorporated portion of the Brookings UGB using these same regulatory density ranges. Low density constitutes the single largest part of the residential land base in the unincorporated UGB area, with the two lowest density zones (RR-5 and RR-10) occupying more than 1,200 acres between them. To put that in perspective, RR-5 and RR-10 lands cover almost as much area as all of Brookings low density zoned land and the Lone Ranch PUD combined.



Historically, lower density, single detached homes have been the predominant housing type in both the City of Brookings and the unincorporated UGB.

25. For R-2 properties, a duplex was assumed to be developed on a 6,000 square foot lot as permitted under CCLDO 3.111; for R-3, it was assumed that an acre site was developed at the maximum allowed density of 1 dwelling unit/2,000 square feet of site area as permitted under CCLDO 3.154.

Curry County Residential Land Base Summary				
Jurisdiction	**Zone**	**Residential Tax Lots in Zone**	**Total Area in Zone (Acres)**	**Residential Use Category (Low/Med/High)**
County	R-1	150	95.69	Low
County	RR-10	444	550.25	Low
County	RR-5	218	595.47	Low
		812	**1,241.41**	
County	R-2	959	811.03	Medium
		959	**811.03**	
County	C-1	99	125.41	High
County	R-3	81	118.56	High
		180	**243.97**	
County	C-2	6	3.92	N/A
County	FG	1	5.80	N/A
County	I	0	0.00	N/A
County	MA	0	0.00	N/A
County	MPA/FG	14	223.27	N/A
County	PF	6	3.13	N/A
County	RC	44	56.61	N/A
County	RI	1	16.81	N/A

Table 2-5: Curry County Residential Land Base Summary. Data Source: Curry County, Lane Council of Governments. Geoprocessing, calculations and analysis by Green Top PDR.

The unincorporated UGB also has significant amounts of medium and high density lands with the R-2, R-3, and C-1 zones. As Table X demonstrates, although the unincorporated UGB has large tracts of extremely low density residential land (RR-5 has a density of 0.60 dwellings/net acre and RR-10 only 0.10 dwellings/net acre), a little more than 35% of residential lands in the unincorporated UGB are zoned for medium density and nearly 11% are zoned for high density residential development.

Residential development can be found in unincorporated parts of Brookings' UGB on land with zoning designations that do not permit residential development with clear and objective standards, such as Public Facilities (PF). In such cases, residential development is assumed to have been permitted through a discretionary process like a Conditional Use Permit or is legally nonconforming. Unlike the residential land base located inside the City of Brookings, several large areas of nonresidential zoned land were found to have existing residential development (over 223 acres and nearly 57 acres in the MPA/FG and RC zones, respectively). Although properties in these zones with existing residential development are assumed to continue to accommodate existing residential uses, lands with similar zoning are not assumed to provide additional capacity for future residential development and are not included in the RBLI.

DEVELOPMENT CONSTRAINTS

The ability to develop residential land is affected by a variety of conditions. Many of these are environmental, including the presence of natural hazards identified in a comprehensive plan

or land use regulation, and environmentally sensitive lands like wetlands and riparian areas. Infrastructure adequacy also influences whether and when residential land can reasonably be expected to develop. Each of these conditions are considered in detail in the following.

- **Steep slopes.** The City of Brookings applies additional development regulations to lands with slopes over 15%. These regulations are designed to reduce risks posed by development on geologically unstable land. State administrative rules, recognizing these same concerns, allow residential lands with slopes of 25% or more to be designated as constrained (undevelopable). This RBLI generally follows this rule, except in instances where existing residential lots have been platted and are otherwise available for development. In these cases, it is assumed that geotechnical conditions have been addressed through the land division process and local regulations have been met.

  Steep slopes and related environmental conditions affected more residential land than other type of environmental constraint. This RBLI documents that 1,621 acres were found to be constrained by slopes 25% and steeper.[26] Land characterized as highly or very highly susceptible to landslides, which are coincident with steep slopes, were also evaluated as constraints. They affected 1,336 and 488 acres, respectively.

  The Department of Geology and Mineral Industries (DOGAMI), which also provides the landslide susceptibility data above, maintains data that identifies 775 acres of land impacted by "rapidly moving landslides". Again, much of this area coincides with the steep slopes and landslide susceptible lands.

  Each of these constraints is depicted individually in Figures 2,3, and 4.

- **Floodplains.** OAR 660-008-0005(7)((d) identifies residential land impacted by "100-year flood plain or floodway" as potentially unavailable or unsuitable for development. 203 acres of residential lands are impacted by the presence of floodplains (known as the "Special Flood Hazard Area or SFHA). This constraint is depicted in Figure 5.

- **Riparian Areas.** Both the City of Brookings and Curry County protect riparian areas with minimum setbacks or buffers wherein development cannot occur or is very restricted. Buffers range from 50 feet from the Top of Bank for smaller creeks in the City of Brookings to a 75 foot buffer along the Chetco River. Riparian areas were found to constrain 196 acres of residential land in the UGB. This constraint is depicted in Figure 6.

- **Wetlands.** The Brookings UGB contains a range of different types of wetlands including estuarine, riverine, and freshwater forested. Altogether, these environmentally sensitive features cover (and constrain) 134 acres. This constraint is depicted in Figure 7.

- **Coastal Conservation.** This is a protective overlay zone administered by Curry County for lands abutting the ocean south of the Chetco River. Development regulations in the overlay are very restrictive, only allowing a limited number of conservation and recreation related uses. The overlay affects 88 residential properties, covering 9.6 acres of residential land. This constraint is depicted in Figure 8.

As mentioned previously, environmental constraints often coincide with one another and overlap. Land with steep slopes may also be susceptible to landslides and may have floodplains. In order to avoid double or even triple counting these constraints, each these individual constraints were combined into a single feature using geospatial (GIS) software (Figure 1). The resulting combined environmental constraints cover and constrain 2,459 acres of residential land.

26. Land with slopes 25% and steeper were measured in units of one (1) contiguous acre. In other words, slopes 25% and steeper had to cover at least 1 contiguous acre in order to "constrain" land.



Environmental Constraints Summary				
Environmental Constraint	**Area of Impact on Residential Lands (Acres)**	**% of Residential Land Impacted**	**# of Residential Properties Impacted (Taxlots)**	**% of Residential Properties Impacted**
FEMA Floodway & 1% Flood	202.8	4.67%	398	8.17%
Slope 25%+ (1-ac blocks)	1,620.7	37.32%	1,787	36.69%
Landslide - High	1,335.5	30.75%	1,848	37.95%
Landslide - Very High	487.6	11.23%	429	8.81%
Estuarine/Marine Deepwater	2.8	0.06%	35	0.72%
Estuarine/Marine Wetland	35.3	0.81%	234	4.80%
Freshwater Emergent Wetland	9.0	0.21%	15	0.31%
Freshwater Forested/ Shrub	15.5	0.36%	70	1.44%
Freshwater Pond	1.8	0.04%	2	0.04%
Riverine	69.4	1.60%	468	9.61%
Riparian Setback	196.5	4.52%	282	5.79%
Rapidly Moving Slides	774.5	17.84%	817	16.78%
County Conservation Zone	9.6	0.22%	88	1.81%
COMBINED (de-overlapped union)	2,459.1	56.63%	2,365	48.56%
Coastal Erosion (EXCLUDED from combined)	137.7	3.17%	311	6.39%

Table 2-6: Environmental Constraints Summary. Data source: Curry County, Lane Council of Governments, City of Brookings, GTPDR, National Wetlands Inventory, DOGAMI, FEMA. Geoprocessing and analysis by Green Top PDR.

Combined Environmental Constraints

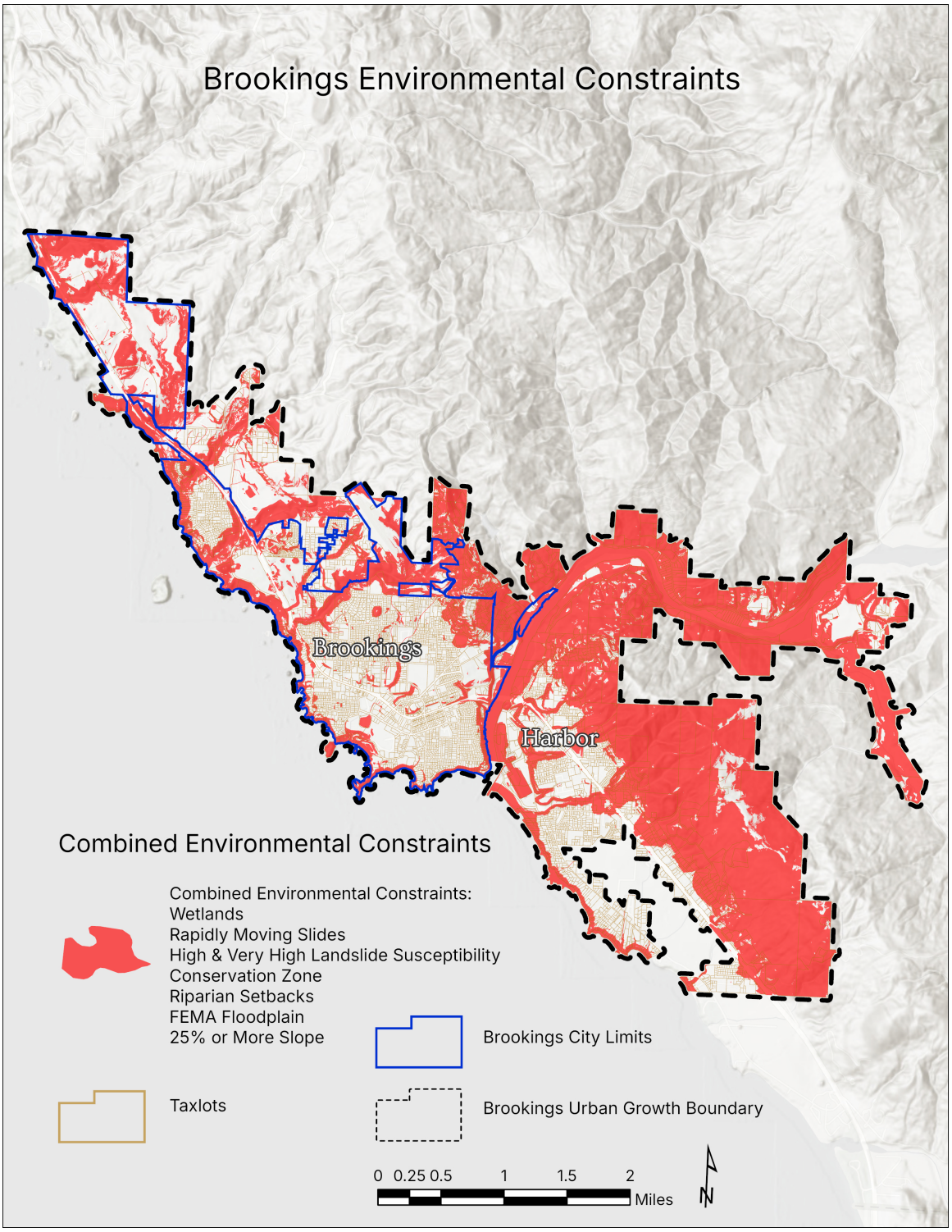


Figure 2-1: Combined Environmental Constraints. Data Sources: Curry County, Lane Council of Governments, City of Brookings, GTPDR, National Wetlands Inventory, DOGAMI, FEMA

Slopes 25% and Steeper

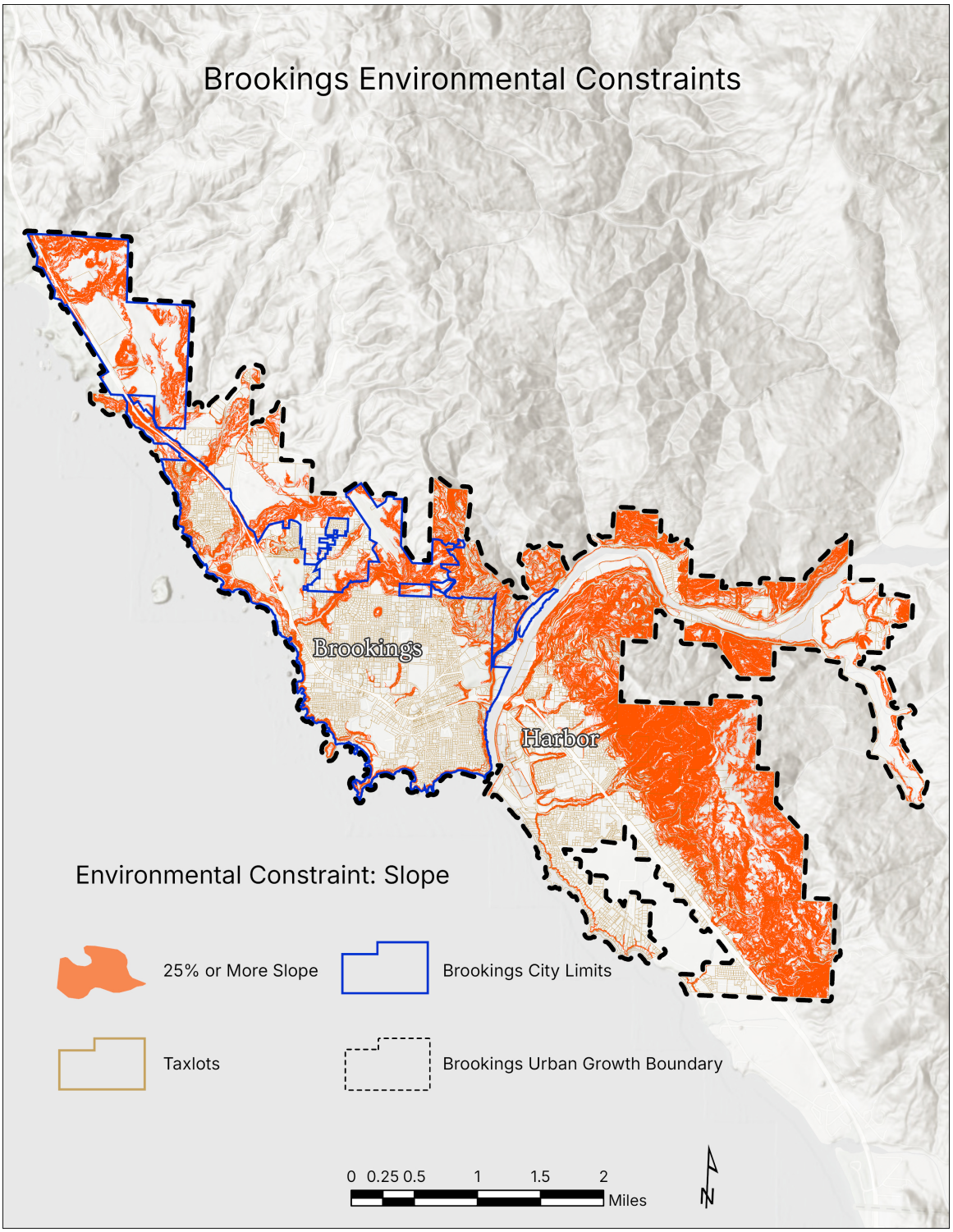


Figure 2-2: Slopes 25% and Steeper. Data Sources: Curry County, Lane Council of Governments, City of Brookings, Green Top PDR. Geoprocessing and analysis by Green Top PDR.

Lands with High and Very High Landslide Susceptibility

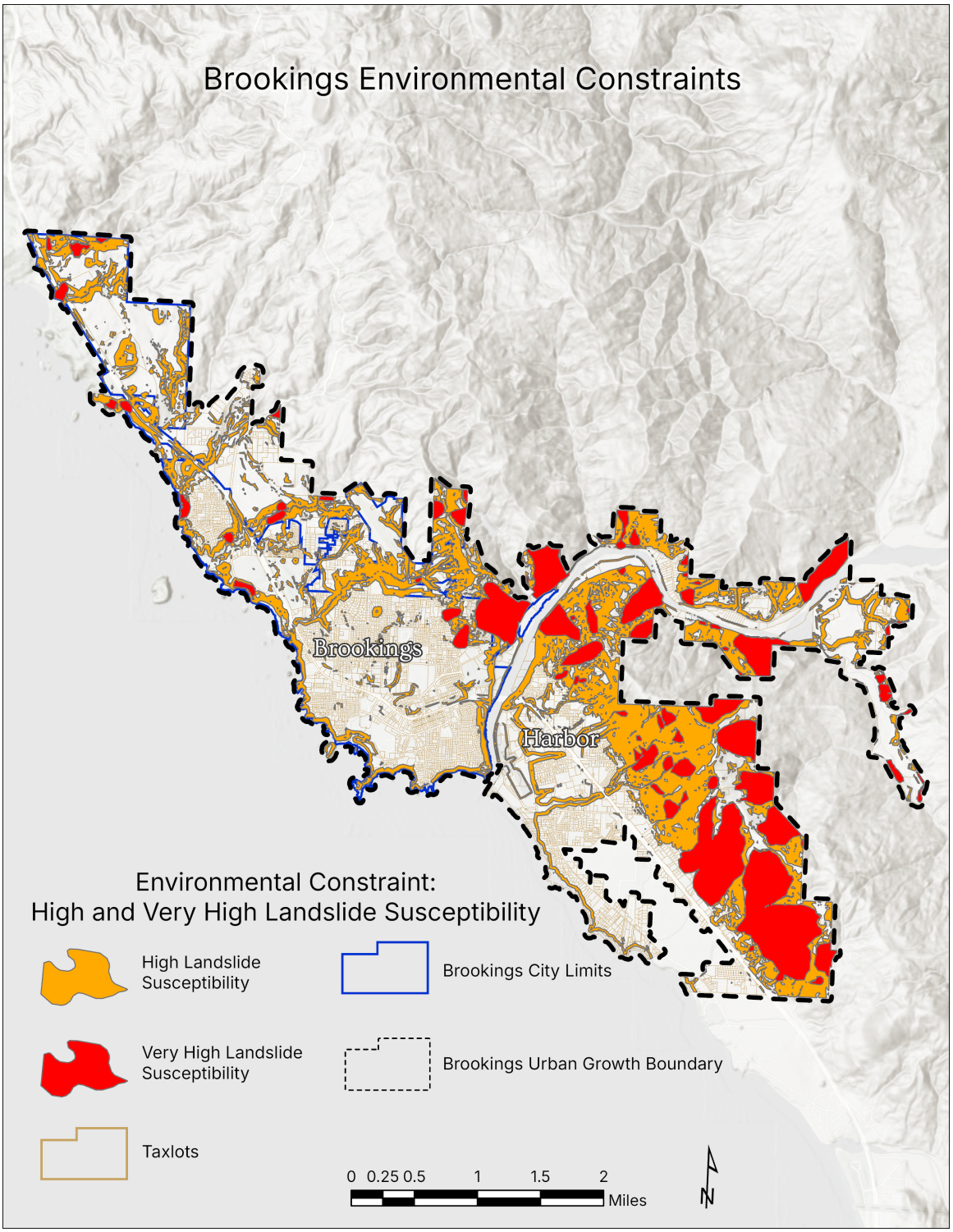


Figure 2-3: Lands with High and Very High Landslide Susceptibility. Data Sources: Curry County, Lane Council of Governments, City of Brookings, Green Top PDR, DOGAMI. Geoprocessing and analysis by Green Top PDR.

Lands with Rapidly Moving Slides

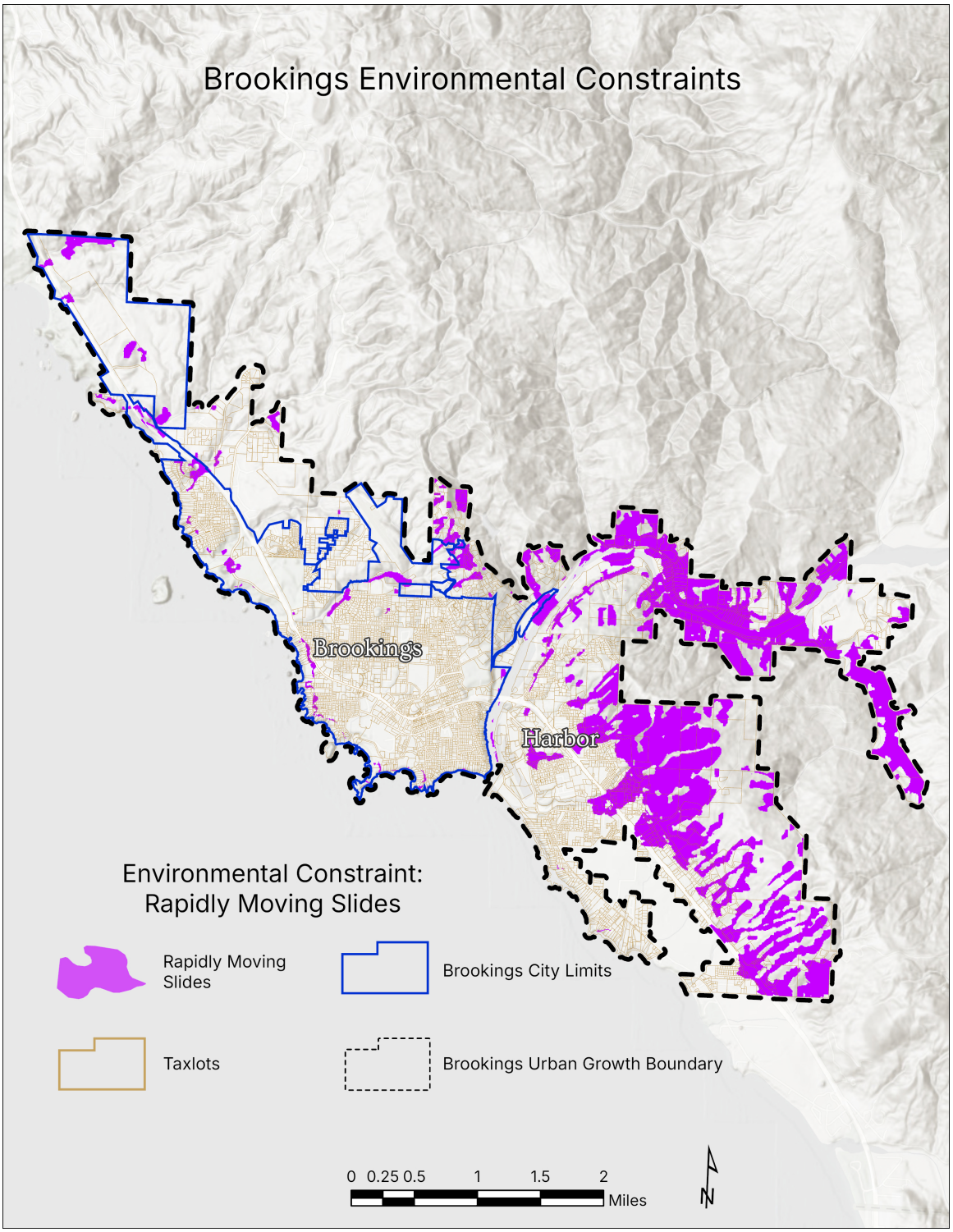


Figure 2-4: Lands with Rapidly Moving Slides. Data Sources: Curry County, Lane Council of Governments, City of Brookings, Green Top PDR, DOGAMI. Geoprocessing and analysis by Green Top PDR.

Special Flood Hazard Area (SFHA)

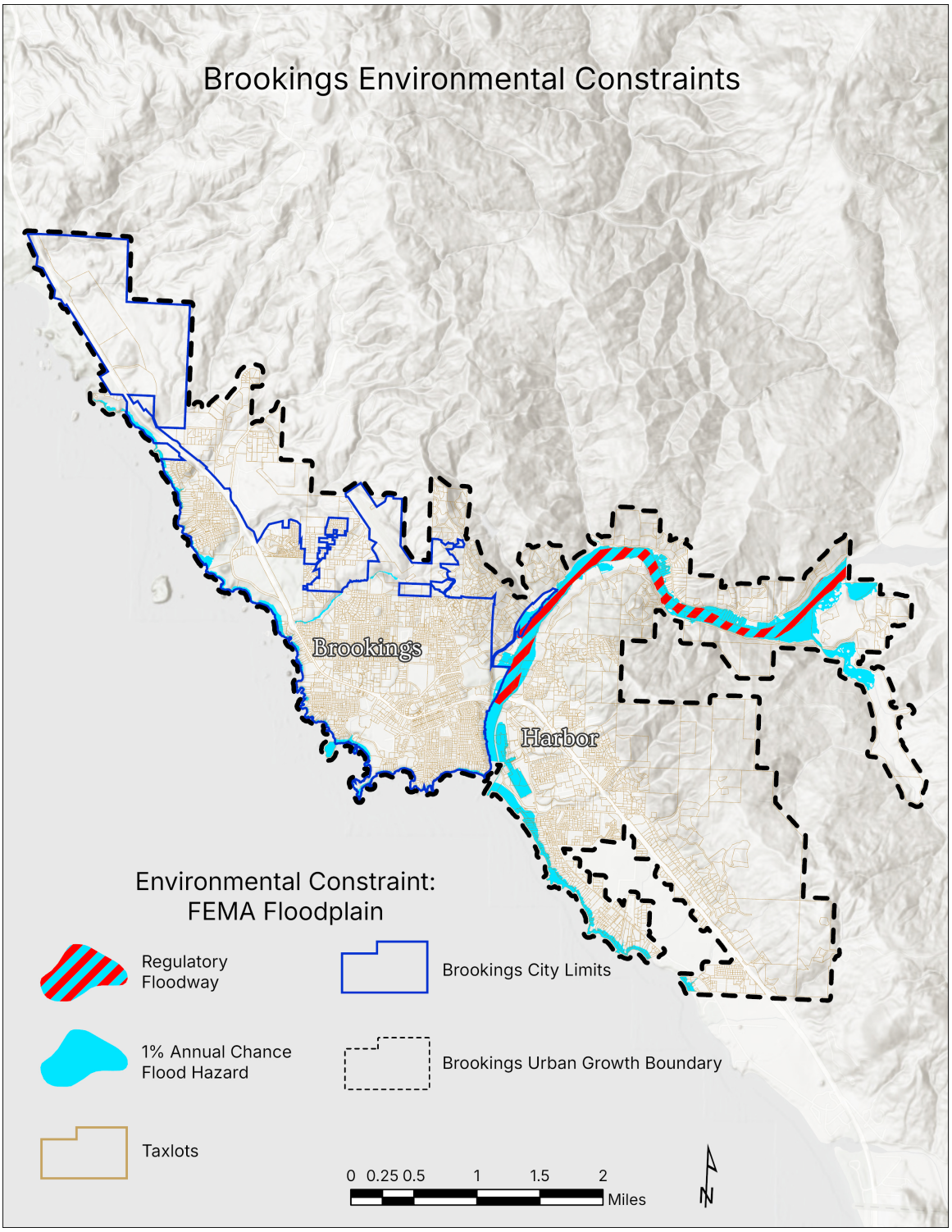


Figure 2-5: Special Flood Hazard Area (SFHA). Data Sources: Curry County, Lane Council of Governments, City of Brookings, Green Top PDR, FEMA. Geoprocessing and analysis by Green Top PDR.

Riparian Setbacks

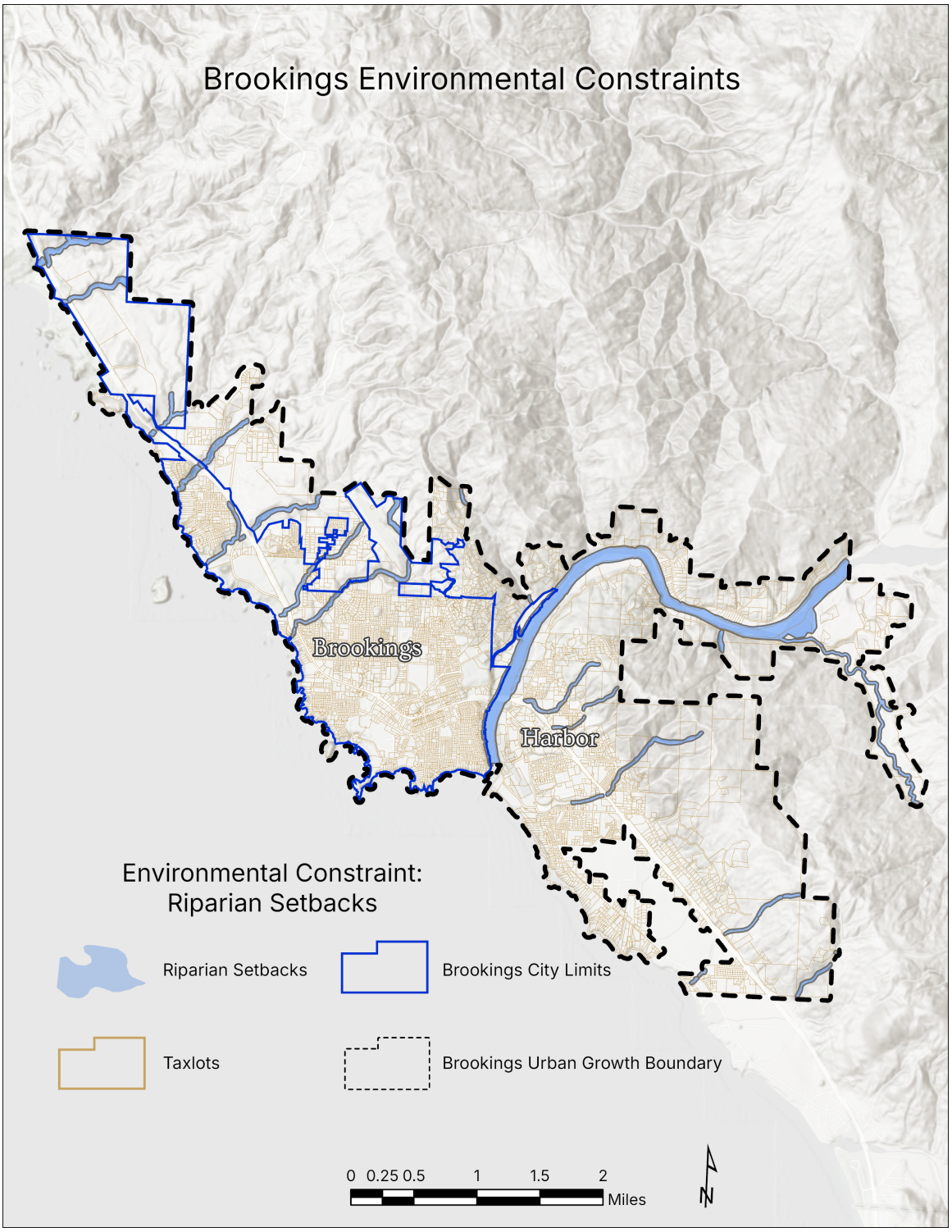


Figure 2-6: Riparian Setbacks. Data Sources: Curry County, City of Brookings, Green Top PDR. Geoprocessing and analysis by Green Top PDR.

Wetlands

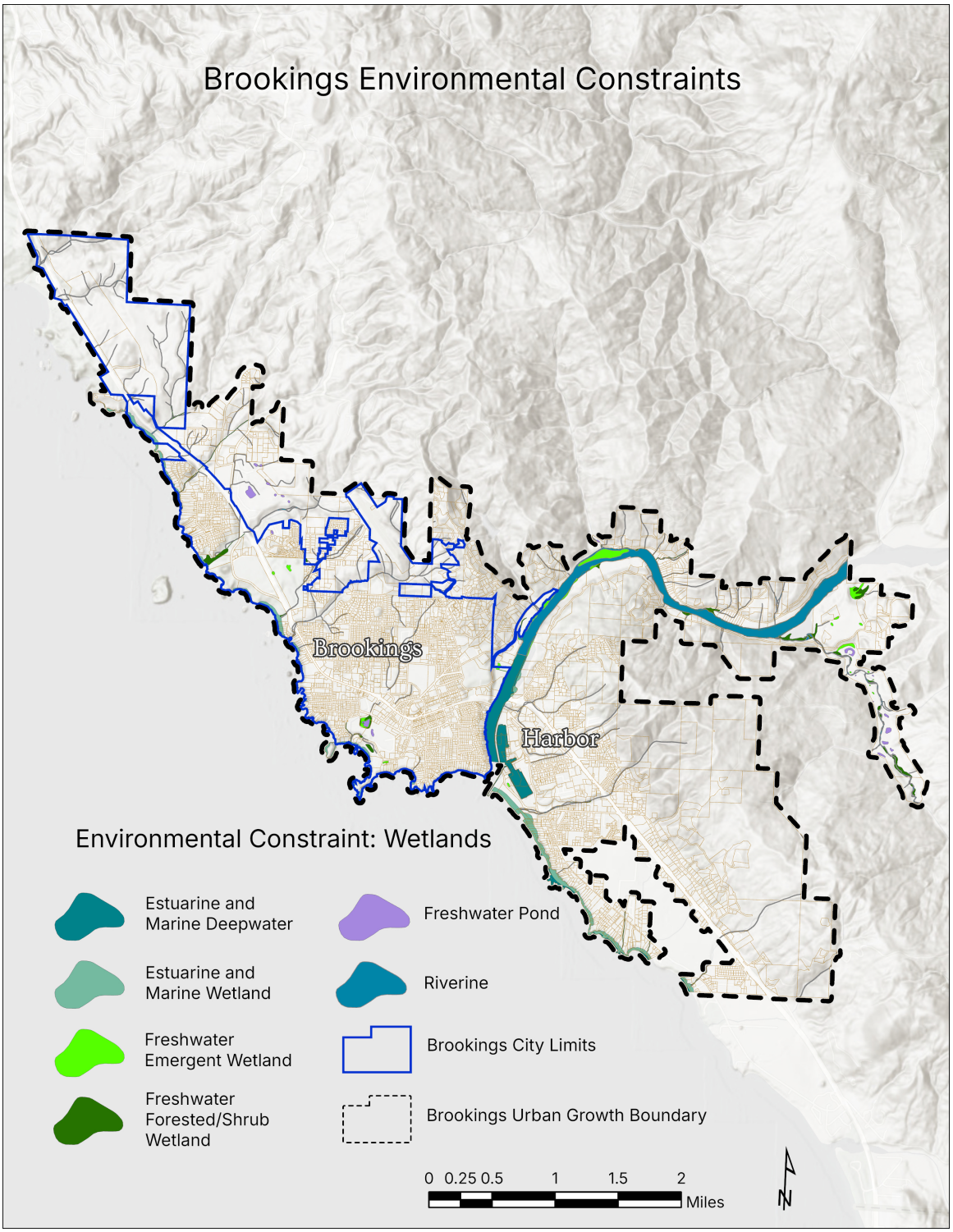


Figure 2-7: Wetlands. Data Sources: Curry County, Lane Council of Governments, City of Brookings, National Wetland Inventory, Green Top PDR. Geoprocessing and analysis by Green Top PDR.

Coastal Conservation Zone

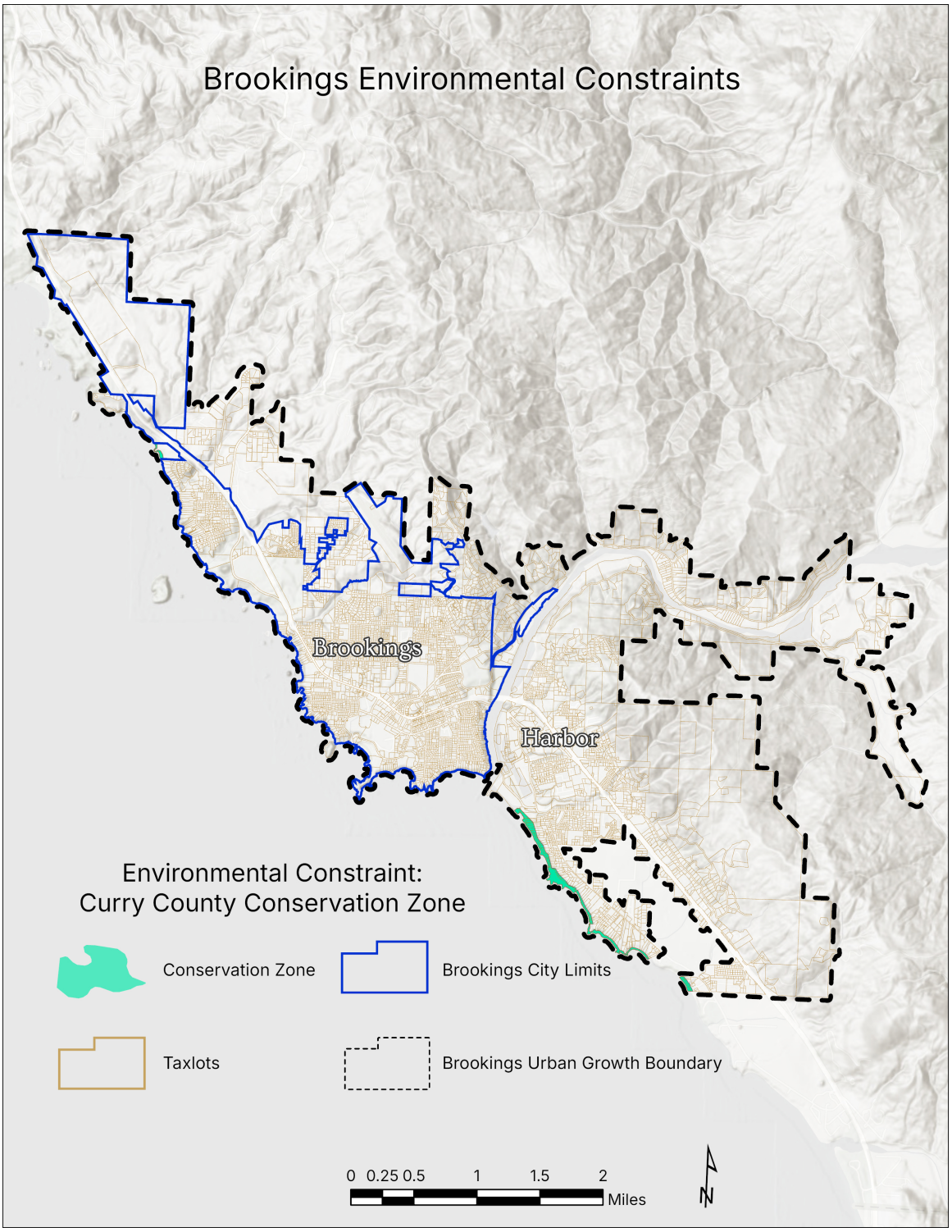


Figure 2-8: Coastal Conservation Zone. Data Sources: Curry County, Lane Council of Governments, Green Top PDR. Geoprocessing and analysis by Green Top PDR.

DEVELOPMENT STATUS

State statute and administrative rules define whether land is buildable or not for the purposes of a Residential Buildable Land Inventory. OAR 660-008-0005 defines residential "buildable land" as land designated or zoned to allow residential use within the planning boundary, including vacant land, partially vacant land, and developed land likely to be redeveloped, that is suitable, available, and necessary for the development of needed housing over a 20-year planning period.

In addition to larger, open tracts of land that are more obvious candidates for development, cities must also account for residential land that could be further developed, even if that is unlikely to occur. The "suitability" or "availability" of residential land for development is determined based on the presence of existing development and environmental and other constraints or factors that may discourage or even prevent development.

Partially vacant residential properties were reviewed one-by-one to address unique circumstances affecting how much developable land might be available.

Brookings UGB RBLI Status Summary						
BLI Status	**# Tax Lots**	**% of Total Tax Lots**	**Total Area (Acres)**	**% of Total UGB Residential Acres**	**Develop-able Acres**	**% of Total Res. Acres**
Vacant	469	9.63%	1,312.3	30.22%	488.5	11.2%
Partially Vacant	214	4.39%	357.6	8.24%	212.5	4.9%
Redevelopable	1	0.02%	2.6	0.06%	2.6	0.1%
Undevelopable	160	3.29%	99.0	2.28%	0.0	0.0%
Developed	4,022	82.59%	2,550.8	58.74%	0.0	0.0%
Not Applicable	4	0.08%	20.0	0.46%	-	0.0%
Total (all residential + redevelopable)	**4,870**	100.00%	**4,342.4**	100%	**703.7**	**16.2%**

Table 2-7: Brookings UGB RBLI Status Summary. Data sources: Curry County, Lane Council of Governments, City of Brookings, GTPDR, National Wetlands Inventory, DOGAMI, FEMA. Geoprocessing and analysis by Green Top PDR.

The outcome of this review places residential properties into one of the following categories:

- **Developed.** Consistent with OAR 660-008-01000(5)(b), residential properties smaller than 0.50 acres that have an existing dwelling are considered "fully developed". In addition, residential properties with existing dwellings 0.50 acres and larger may be classified as developed when the property is encumbered by "ancillary" development (driveways and other pavements, accessory structures, swimming pools and sports courts). The inventory documented 4,022 developed residential properties in the UGB, covering 2,550 acres. As "developed" residential lands, it was determined that they did not have any remaining capacity for further development by land divisions or development of additional units on the same lot.[27] Residential properties in this category represent more than 83% of residential properties in the UGB and nearly 59% of the total area occupied by residential land within the UGB (Table 2-7).

- **Vacant.** These are residential properties with no structures or structures with very little value. For example, an acre of undeveloped residential zoned land with a small shed would be considered "vacant", able to be further developed.

27. This does not include accessory dwelling units (ADUs).

In terms of both the number of properties and their overall acreage, the number of vacant lots in UGB is small relative to the number of and areal extent of developed residential lands: 469 tax lots, covering 1,312 acres (30% of all residential lands within the UGB) were found to be vacant.

Of this, only 488.5 acres were found to be free from the environmental constraints discussed above and suitable for development. Residential properties in this category represent just under 10% of residential properties in the UGB (Table 7) and just over 11% of the total area zoned or used as residential land within the UGB (Table 7). Vacant designated land also constitutes nearly 70% of the 704 developable residential acres available in the UGB.

- **Partially Vacant.** These are residential properties "with existing development [...] where the remaining, unconstrained land area can be further developed within the applicable development regulations."[28]

  OAR 660-008-0100(5)(a) allows cities with a population of no more than 25,000 (like Brookings) to apply a safe harbor when calculating the amount of additional development that may occur on a residential property with an existing dwelling that is larger than 0.50 acres. This RBLI applies this method, removing 0.25 acres for the existing dwelling and designating the remaining unconstrained land as developable. Land is considered to be unconstrained when it is free from environmental and other constraints discussed above. For example, a one-acre residential property with an existing home is assumed to have 0.75 acres available for further development (1 acre – 0.25 acres for the existing home = 0.75 acres). If, however, 0.25 acres are located within a riparian setback, only 0.50 acres are considered to be available and suitable for further development (sometimes known as "infill" development), because 0.25 acres are "constrained".

- Across the entire UGB, only 214 tax lots covering 358 acres were determined to be partially vacant. Residential properties in this category represent a little over 4% of residential properties in the UGB (Figure 10) and a little over 8% of the total area designated as residential land within the UGB (Figure 11).

  The vacant portion of these partially vacant properties that is free from environmental constraints and available for development covers nearly 213 acres or just under 5% of developable residential lands within the UGB.

- **Undevelopable/Unbuildable.** These are lands that may be zoned to allow residential development, but are not "available" or "suitable" for residential development because they are publicly owned or in public use, or are otherwise constrained by site characteristics or regulatory restrictions that prevent development.

  In addition to analysis of the RBLI database, the consultant also "coordinated with public entities on any publicly owned land" to determine if any might be available for residential development.

  In the UGB, 160 properties, covering roughly 99 acres, were determined to be unbuildable for the reasons described above. None of this land is considered to be developable. Properties in this category represent nearly 3.3% of all residential properties in the UGB (Figure 10) and just over 2% of the residential land area within the UGB (Figure 11).

- **Redevelopable.** Redevelopable properties are those that can reasonably be expected to transition to residential use or to a more intensive residential use over the planning period. Determining this status is highly dependent on local knowledge of the unique characteristics affecting individual properties. Only one commercial 2.6 acre property was placed in this category. Separate from the inventory, the potential to redevelop commercial properties is evaluated further in the subsequent capacity analysis.

28. OAR 660-008-01000(38)

Figure 2-9 illustrates the development or buildable status of residential land in the Brookings UGB.

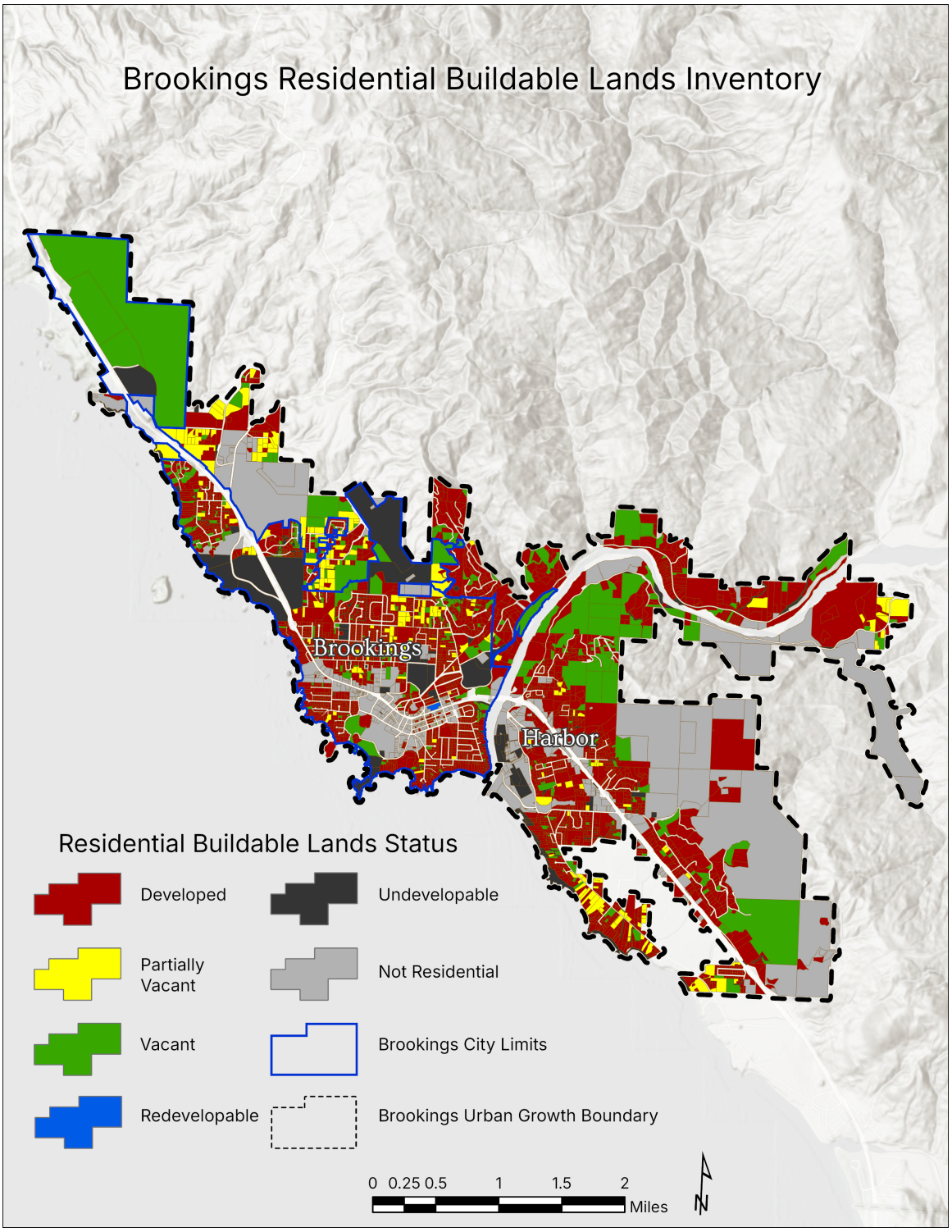
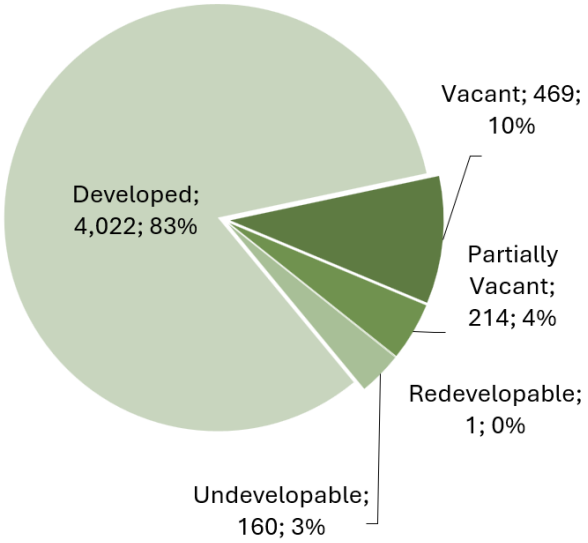
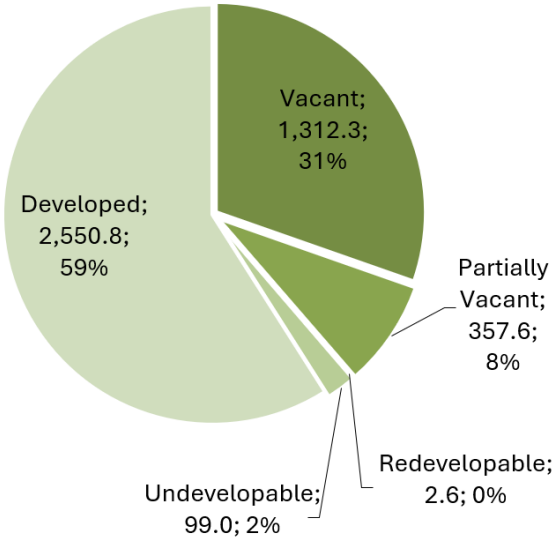


Figure 2-9: Residential Buildable Lands Inventory, Development Status. Data Sources: Curry County, City of Brookings, Lane Council of Governments, Green Top PDR. Geoprocessing and analysis by Green Top PDR.

Development Status by Tax Lots



Development Status by Area (Acres)



Figures 2-10 & 2-11: Residential Lands Development Status by Number of Properties and Area. Data Sources: Curry County, City of Brookings, Lane Council of Governments, Green Top PDR; analysis by Green Top PDR.

Altogether, the RBLI documented 704 acres of buildable residential land within the UGB or approximately 16% of the 4,342 acres currently zoned or in residential use within the UGB. As shown in Figure 12, 58% of the total area of buildable residential land is located within the current city limits, while the remainder is in unincorporated part of the UGB.

Developable Residential Land Summary by Jurisdiction

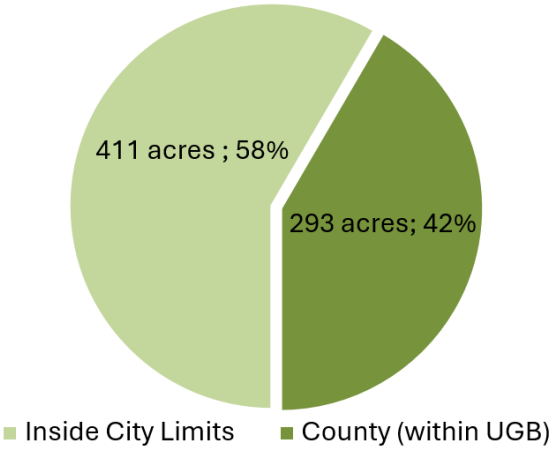


Figure 2-12: Developable Residential Land Summary by Jurisdiction. Data Sources: Curry County, City of Brookings, Lane Council of Governments, Green Top PDR; analysis by Green Top PDR.

Chapter 3. Residential Lands Capacity Analysis

KEY FINDINGS

- Housing development in the Brookings UGB has fluctuated over the years. Consistent with historical population trends, residential development in Brookings was highest in the period from 1990-1999 when, according to ACS data, nearly 950 dwelling units were constructed (almost 30% of its existing housing). Harbor, likewise, has newer housing stock, experiencing significant development in the first decade of this century when 266 units were constructed (nearly 18% of its existing housing) over that 10 year period.

- Average densities (the number of units/acre of residential zoned land) tend to be much lower than the maximum densities allowed within each zone. R-1-6, for example is the most prevalent residential zone in the City of Brookings, with 1,561 dwelling units on 504 acres. Although this zone allows the densest single unit detached development in Brookings, it has been developed at densities far below the maximum: 3.1 dwelling units/net acre.

- Historical residential development patterns, which have tended toward lower density residential development, will need to shift in order to accommodate the community's changing needs. These needs are driven by demographic trends and the need for housing that is affordable to lower and moderate income households. Development of more middle and higher density housing will be needed to match projected demand over the next 20 years.

- Although historical residential development patterns have tended toward the lower end of permitted densities, recent residential development has shifted toward higher permitted densities. This suggests emerging market alignment with the need for more medium and higher density housing options.

- The City of Brookings has a vacancy rate of around 9%, about 300 dwelling units, which is relatively high. Although higher vacancy rates can indicate softer demand for owner and renter occupied housing, that is probably not the case here. In Brookings, the reason for higher vacancy is likely to be the result of second homes, that are seasonally or "recreationally" occupied, and short terms rentals. Data suggests that vacancy may disproportionately impact the inventory of housing types which might otherwise provide affordable market rate ownership and rental opportunities for middle income households.

- There is sufficient developable residential land available throughout the UGB to meet forecasted housing demand over the next 20 years, and the intervening 7, 10, and 14 year intervals. Much of this capacity is, however, provided by housing planned for the Lone Ranch MPD, which provides enough capacity for low and high density residential development to meet the 20 year need for these densities within its site boundaries. This emphasizes the urgency of realizing the development potential of the Lone Ranch MPD.

- Even with this planned capacity provided in the Lone Ranch MPD, there is a need for medium density residential land elsewhere, which can be met across the remainder of the UGB. However, only a little over 25 acres of medium density land are available for development within the City of Brookings, leaving 84 acres of needed medium density residential land in the unincorporated UGB. This presents practical challenges as medium density development may be less likely to occur in the unincorporated UGB where there is less access to public infrastructure capable of supporting development at those densities.

PAST & CURRENT RESIDENTIAL DEVELOPMENT PATTERNS AND TRENDS

Tenure

Historically, homeownership has been a goal for many households. It has been a vehicle for intergenerational wealth accumulation and transfer. Significant economic events like the Great Recession and ensuing foreclosure crisis challenged some of those assumptions. Meanwhile, changing demographics, shifts in consumer preferences among members of Generation Z, and the diminishing affordability of homeownership have made renting more attractive.

The share of renters and homeowners in Brookings aligns with statewide and national averages, and is consistent with other communities throughout the larger region—roughly 60% homeowners to 40% renters. Curry County overall, however, has a much higher percentage of homeowners with a 75% to 25% split. This is most likely due to the prevalence of single detached homes outside of cities in unincorporated rural areas. Although the percentage of homeownership is not quite as high in Harbor, at nearly 67% homeownership is more prevalent in Harbor than in incorporated Brookings. Crescent City, in contrast, has an unusually high percentage of renters with a 32% to 68% split between homeowners and renters.

Regional Peers Housing Tenure

Location	Occupied Units	Owner-Occupied	Renter-Occupied	% Owner	% Renter
Oregon	1,718,422	1,087,983	630,439	63.3%	36.7%
Curry County, OR	11,159	8,276	2,883	74.2%	25.8%
Brookings city, OR	2,987	1,787	1,200	59.8%	40.2%
Harbor CDP, OR	1,388	926	462	66.7%	33.3%
Bandon city, OR	1,831	1,158	673	63.2%	36.8%
Coos Bay city, OR	6,978	4,192	2,786	60.1%	39.9%
Crescent City, CA	1,693	547	1,146	32.3%	67.7%

Table 3-1: Regional Peers Housing Tenure. Data Source: American Community Survey 2020-2024 5-Year Estimate, Tables DP04

CURRENT HOUSING INVENTORY

Single-detached homes are the most common housing type in Brookings. Of the approximately 2,990 occupied homes documented in the most recent American Community Survey 5-year Estimate (ACS), a little more than 1,800 are single detached (almost 61% of the total). This is consistent with data collected from Curry County Assessor records, which documents 1,757 total dwelling units in "Low Density" zones in the City of Brookings. According to ACS data, nearly 90% (1,621) of these are occupied by homeowners.

At almost 14% of its housing inventory, Brookings has a relatively high percentage of "single-attached" homes (the statewide average is around 5%). More commonly known as townhomes, this development type is characterized by small private front and rear yards and at least one shared wall between units. Most of these units are renter occupied, according to ACS data.
Middle housing types (duplexes, triplexes, small apartment buildings or complexes with fewer than 10 units) account for over 16% of all homes—similar to the number townhomes. The most common subtype within this group are tri and quadplexes, accounting for 142 of the 486 middle housing units. These homes too are mostly renter occupied.

There are 237 units in larger, multi-occupant residential buildings and complexes with ten or more units, representing almost 8% of all dwelling units in Brookings. Only 11 of these were

owner-occupied; the remaining 226 were renter occupied. Interestingly, the number of dwelling units in larger multiunit buildings or developments roughly corresponds with the number of regulated affordable housing units available (see "Regulated Affordable Housing" in the next section below).

Finally, manufactured housing in Brookings represents only 1.37% of total units. This is well below the statewide average of 5.70%, and contrasts significantly with Curry County overall and Harbor where manufactured housing accounts for almost 20% and over 46%, respectively.

Brookings Housing Inventory by Tenure				
Housing Type	**Total Units by Housing Type**	**Percentage of Total**	**Owner**	**Renter**
Single-Detached	1,814	60.73%	54.27%	6.46%
Single-Attached	409	13.69%	2.44%	11.25%
Middle	486	16.27%	2.14%	14.13%
Higher Density (10+)	237	7.93%	0.37%	7.57%
Manufactured	41	1.37%	0.60%	0.77%
Other	0	0.00%	0.00%	0.00%

Table 3-2: Brookings Housing Inventory by Tenure: American Community Survey 2020-2024 5-Year Estimate, Table B25032

Brookings Housing Types Percentage of Total Units

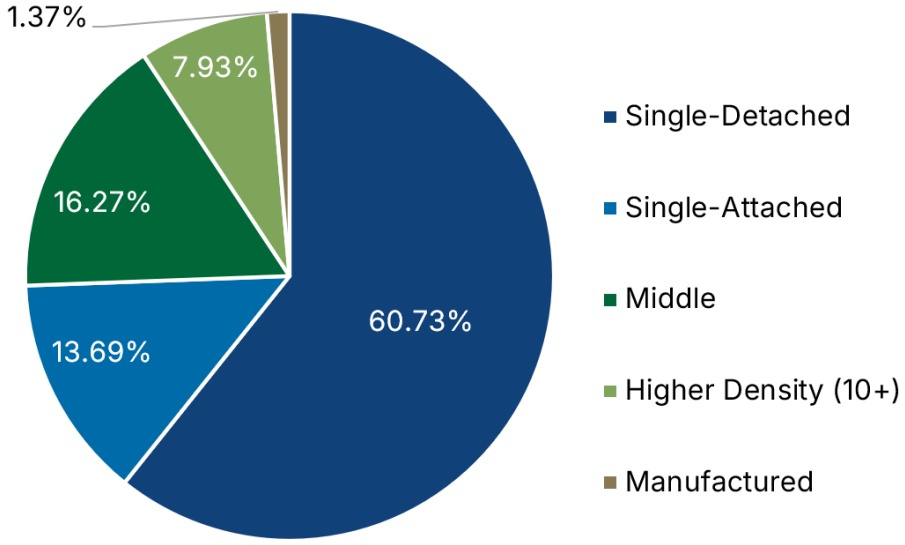


Figure 3-1: Brookings Current Housing Mix. Data Source: American Community Survey 2020-2024 5-Year Estimate, Table B25032

REGULATED AFFORDABLE HOUSING

Table 3-3 identifies all "regulated" affordable housing available in the City of Brookings, according to the State of Oregon affordability housing inventory database. Regulated affordable units are required to be affordable to households at or below different households at income levels. This is often achieved through deed restrictions and ongoing program management and monitoring.

Affordability requirements are often conditions of different types of funding that are available to support the development of this type of housing. Programs include federal Low Income Housing Tax Credits (LIHTC), state of Oregon Local Innovation and Fast Track (LIFT), and a range of other programs administered by the national Department of Housing and Urban Development (HUD).

Regulated Affordable Housing, Brookings UGB	
Property Name	**Total Units**
Heron Ridge Apartments	36
Jerstad Manor	24
Pelican's Perch	24
Pacific View Gardens II	19
Ocean Winds	40
Pacific View Gardens I	16
Maple Leaf	5
Azalea Reach Apartments	40
TOTAL	**204**

Table 3-3: Regulated Affordable Housing, Brookings UGB. Data Source: Oregon Department of Housing and Community Services (OHCS), Oregon Affordable Housing Inventory, https://data.oregon.gov/dataset/Oregon-Affordable-Housing-Inventory/p9yn-ftai/data_preview

VACANCY

Vacancy rates can be used to assess whether local housing markets are balanced between supply and demand. As a practical matter, enough housing needs to be available at any given time in order to accommodate people searching for new places to live. At a higher, macroeconomic level, adequate supplies of available housing moderate rapid inflation in rents and sales prices.

Of the estimated 3,296 total dwelling units in the City of Brookings, a little more than 9% were unoccupied according to the 2020-2024 American Community Survey 5-year Estimate. This is consistent with historical averages and more recent data available from private sources, which show vacancy closer to 10 or 11%. In either case, over 300 units in Brookings are unoccupied (Table 3-4).

Housing Vacancy for Brookings and Harbor						
	Brookings			**Harbor**		
Total Housing Units:	**3,296**			**1,496**		
	Occupied Units	**Vacant Units**	**% Vacant**	**Occupied Units**	**Vacant Units**	**% Vacant**
	2,987	309	9.38%	1,388	108	7.22%
	Occupied Units by Category	**Vacant Units by Category**	**% Vacant by Category**	**Occupied Units by Category**	**Vacant Units by Category**	**% Vacant by Category**
1-unit, detached	1,814	95	5.24%	564	30	5.32%
1-unit, attached	409	115	28.12%	18	0	0.00%
2-9 units	486	99	20.37%	60	0	0.00%
10 or more units	237	0	0.00%	106	43	40.57%
Mobile home, Boat, RV, Van, etc.	41	0	0.00%	640	35	5.47%

Table 3-4: Housing Vacancy for Brookings and Harbor. Data Source: American Community Survey 2020-2024 5-Year Estimate, Table B25136. Calculations by Green Top PDR.

Although higher vacancy rates can indicate softer demand for owner and renter occupied housing and exert downward pressure on the cost of housing, higher vacancy rates may be an aberration and may not presage a softening market and lower costs. Reasons for vacancy can include a home being for sale or rent, seasonal occupancy (status as a second or vacation home), or inability to be occupied, but for Brookings the reason for higher vacancy is likely to be the result of seasonal or recreational occupancies. The 2020-2024 ACS 5-year Estimate identified 100% of vacant units as "For seasonal, recreational, or occasional use". This number seems unrealistically high, but the previous ACS 5-year Estimate (2019-2023) placed 80% of vacant units in that category. Given Brookings' status as a vacation destination, it is reasonable to conclude that a large percentage of vacant units are vacant because they are seasonally occupied, second homes or short term rentals (STRs).

> There are 70 active short term rentals and 8 owner-occupied "bed and breakfasts" in the City of Brookings. The number is steady after increasing rapidly during the first few years of this decade.

Like second homes, short-term rentals are not available to the long-term resident market. The City authorizes whole-dwelling short-term rentals through Conditional Use Permits, and its registry records 70 active STR CUPs.[29] The number of STRs rose rapidly during the early 2020s but has held roughly steady since 2023, as a modest number of new approvals each year has been largely balanced by permits leaving the pool through owner-initiated inactivation, sale, or abandonment. Because a Conditional Use Permit remains in force through annual registration rather than expiring, the active inventory is cumulative and, at present, stable rather than expanding.

A small number of bed-and-breakfast and homestay operations, eight in the current registry, are excluded from this count. These are owner-occupied uses authorized as home occupations rather than through the Conditional Use Permit process. Because the operator continues to reside in the dwelling while renting individual rooms, the unit remains occupied as housing and is not withdrawn from the long-term supply. Only whole-dwelling STR permits are counted here.

The vacancy rate in Brookings' UGB (the City of Brookings in particular) does not impact all types of housing equally. In both Brookings and Harbor, however, single detached homes (which represent the single most common housing type in both communities) had the lowest vacancy rates—both just slightly over 5%, which is still nearly five times the national average.[30] Harbor's overall vacancy rate is lower than Brookings, just over 7%. Vacancy rates for its single detached and manufactured homes are virtually identical with one another and that of Brookings at around 5.5%. Multiunit buildings and developments with more than 10 units in Harbor had a very high vacancy rate of nearly 41%. This may be due to the fact that high density housing in Harbor may be predominantly short term rental (STR) and/or seasonally occupied. Unlike the City of Brookings, Curry County does not regulate short term rentals, so accurate information about the extent of STRs and seasonally occupied units is not available. In the City of Brookings, data shows a relatively high vacancy rate for townhomes and middle housing units. This suggests that the high vacancy rate, which is likely attributable to second homes and short term rentals, disproportionately impacts the inventory of housing types which provide affordable market rate ownership and rental opportunities for middle income households.

AGE OF HOUSING

The age of a community's housing stock is often correlated with its overall condition. This information can shape policy intended to enable homeowners and landlords to maintain residential properties in good condition and reduce long term costs of ownership and occupancy that are usually passed on to renters or absorbed by homeowners. For example, homeowners and renters alike may enjoy greater long term affordability in a home that has recent energy efficiency improvements.

29. Source: City of Brookings Short-Term Rental Registry, current as of April 4, 2026. A small share of exited permits carry no recorded end date, so counts for individual past years are approximate; the current active total is firm.
30. The average vacancy rate for owner occupied homes nationally was 1.2% at the end of the second quarter in 2026 according data collected by the Federal Reserve Bank of St. Louis: https://fred.stlouisfed.org/series/RHVRUSQ156N

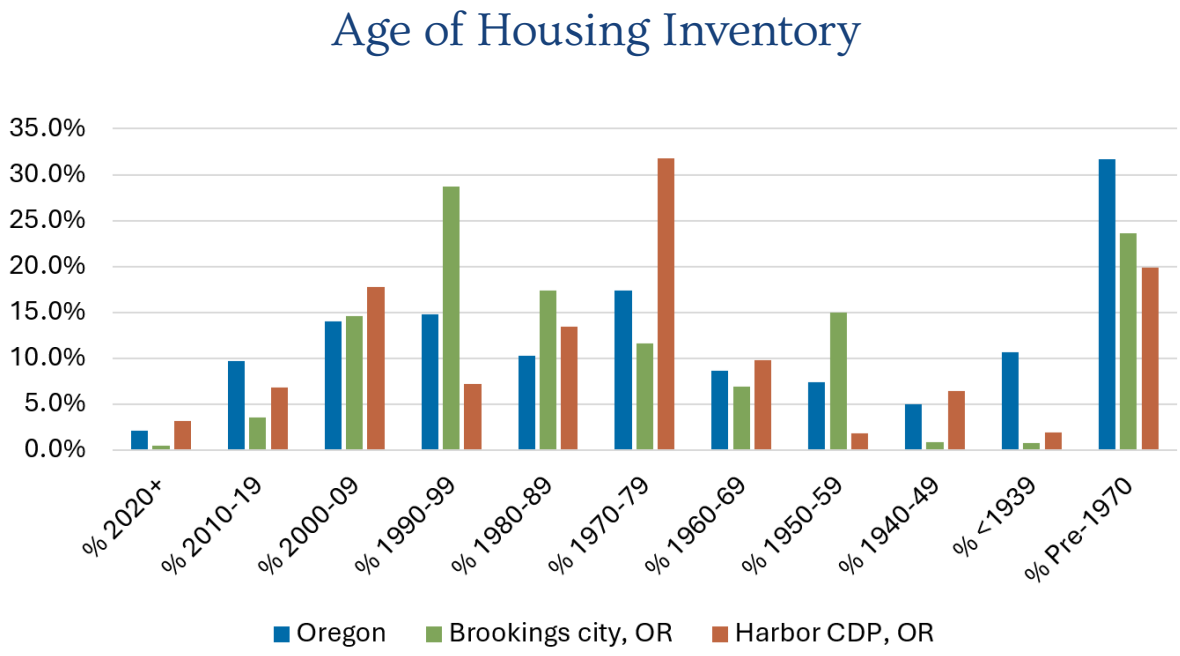


Figure 3-2: Brookings Current Housing Mix. Data Source: American Community Survey 2020-2024 5-Year Estimate, Table DP04

Brookings' housing stock is relatively new compared to the statewide average. Consistent with historical population trends, residential development in Brookings was highest in the period from 1990-1999 when, according to ACS data, nearly 950 dwelling units were constructed (almost 30% of its existing housing). Harbor, likewise, has newer housing stock, experiencing significant development in the first decade of this century when 266 units were constructed (nearly 18% of its existing housing) over that 10 year period.

Since its peak in the 1990s, construction of new homes in the City of Brookings has fallen steadily and sharply: according to ACS data, only 16 homes were constructed during the period between 2020 and 2025. Although this figure, which is based on sample data with a significant margin of error, is lower than that observed in data collected from building permits records (see "Recent Residential Development Trends" below), it is consistent with the conclusion that residential development slowed in Brookings' UGB at the beginning of this decade. Recent development trends discussed in the next section of this report suggest that may be changing.

RECENT RESIDENTIAL DEVELOPMENT TRENDS

Over the past 10 years, residential development in Brookings' UGB has fluctuated from year to year. According to data collected from the Accela building permit tracking system, the most building permits for new one and two-family homes issued in a single year were issued in 2021 and 2022 (19 in both years) while the most permits issued for manufactured housing (28) were issued in 2020. From 2016-2026, an average of 14 building permits for one and two-family homes and 15 permits for manufactured homes have been issued every year. In the first five months of 2026, six permits had been issued for single and two-family homes and only 2 permits had been issued for manufactured homes.

Not including new housing with three or more units (which are permitted through Oregon's commercial structural code and not included in the building permits dataset used here), this represents a quarter of the 118 dwelling unit annual production target established by the OHNA.

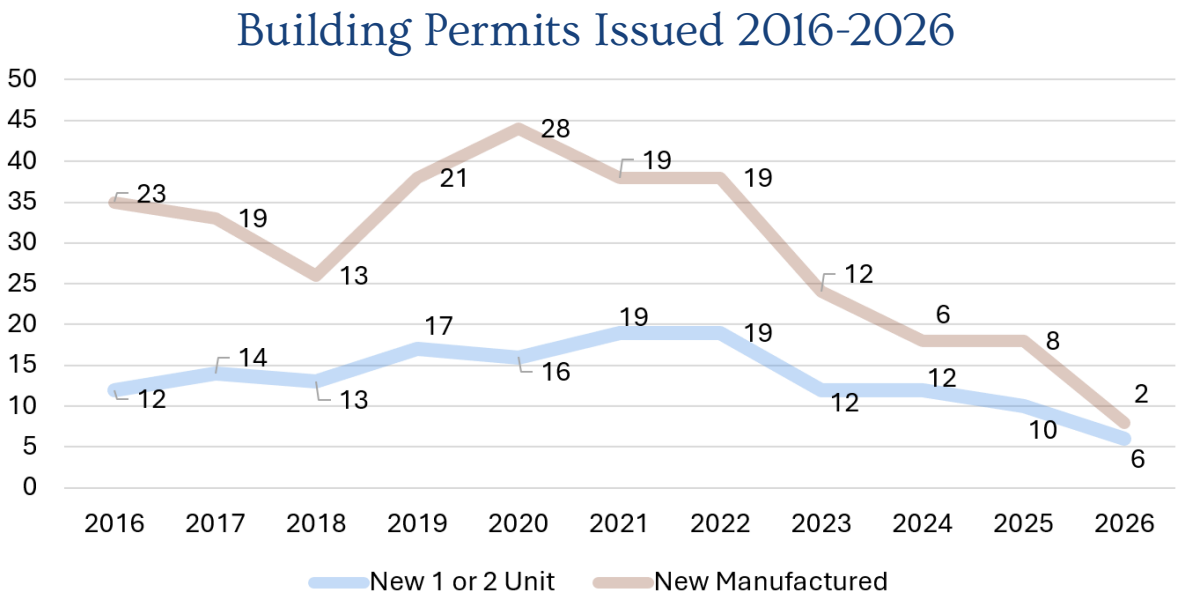


Figure 3-3: Building Permits Issued Brookings UGB, 2016-2026. Data Source: Accela permit tracking system, calculations and analysis by Green Top PDR.

Recent land use entitlements in the City of Brookings, however, show a return to a pattern of increased residential development. Altogether, 144 dwelling units have been entitled[31] since 2016, with more than 90% of these units approved in the last 6 years.

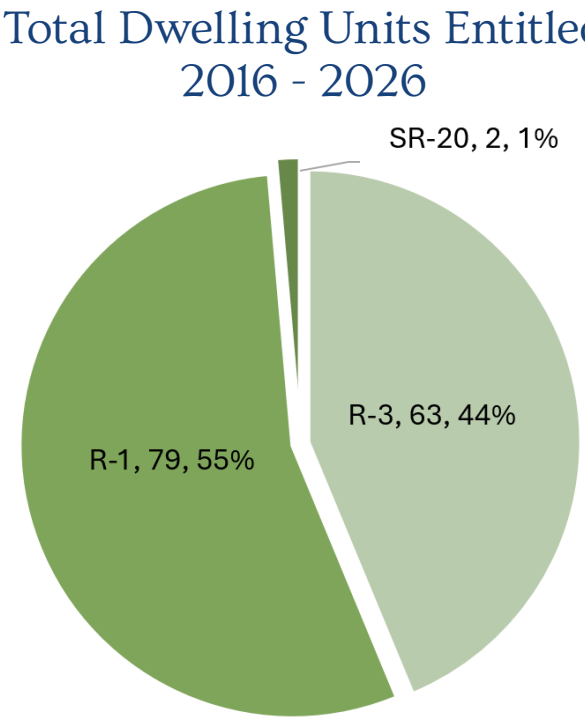


Figure 3-4: Dwelling Units Entitled in the City of Brookings, 2020-2026. Data Source: City of Brookings records, calculations and analysis by Green Top PDR.

As depicted in Figure 3-4, these units were split 55% to 44% between land in R-1 and R-3 zones. All of the subdivisions and the Bedrock PUD were approved over the last 6 years, and 7 of the 12 partitions were approved over the last 5 years, all evidence of accelerating momentum in residential development that includes significant medium density development.



31. Entitlements include approved subdivisions, partitions, and PUDs

The Ocean Winds development, the first phase of which has been completed, added 40 regulated affordable townhomes to Brookings' inventory. A subsequent phase of that development is in design. The "Bedrock Subdivision" on Lundeen Lane is entitled for 48 townhomes or duplexes. The Alderwood Subdivision, located at Alderwood Lane and 4th Street, was approved in 2020 and completely built out by 2022 providing 15 manufactured homes on individual lots. The Seacrest Estates Subdivision was approved between 2021 (Phase I and II) and 2024 (Phase III). The first two phases have been constructed, and the third phase is under development currently. Upon total buildout, 42 single detached homes will have been constructed. Further evidence of a strong increase in single detached home construction is found in Curry County Assessor's records, which documented that 14 units of this housing type were built in 2025.

Brooking UGB Building Permit Activity 2016-2026

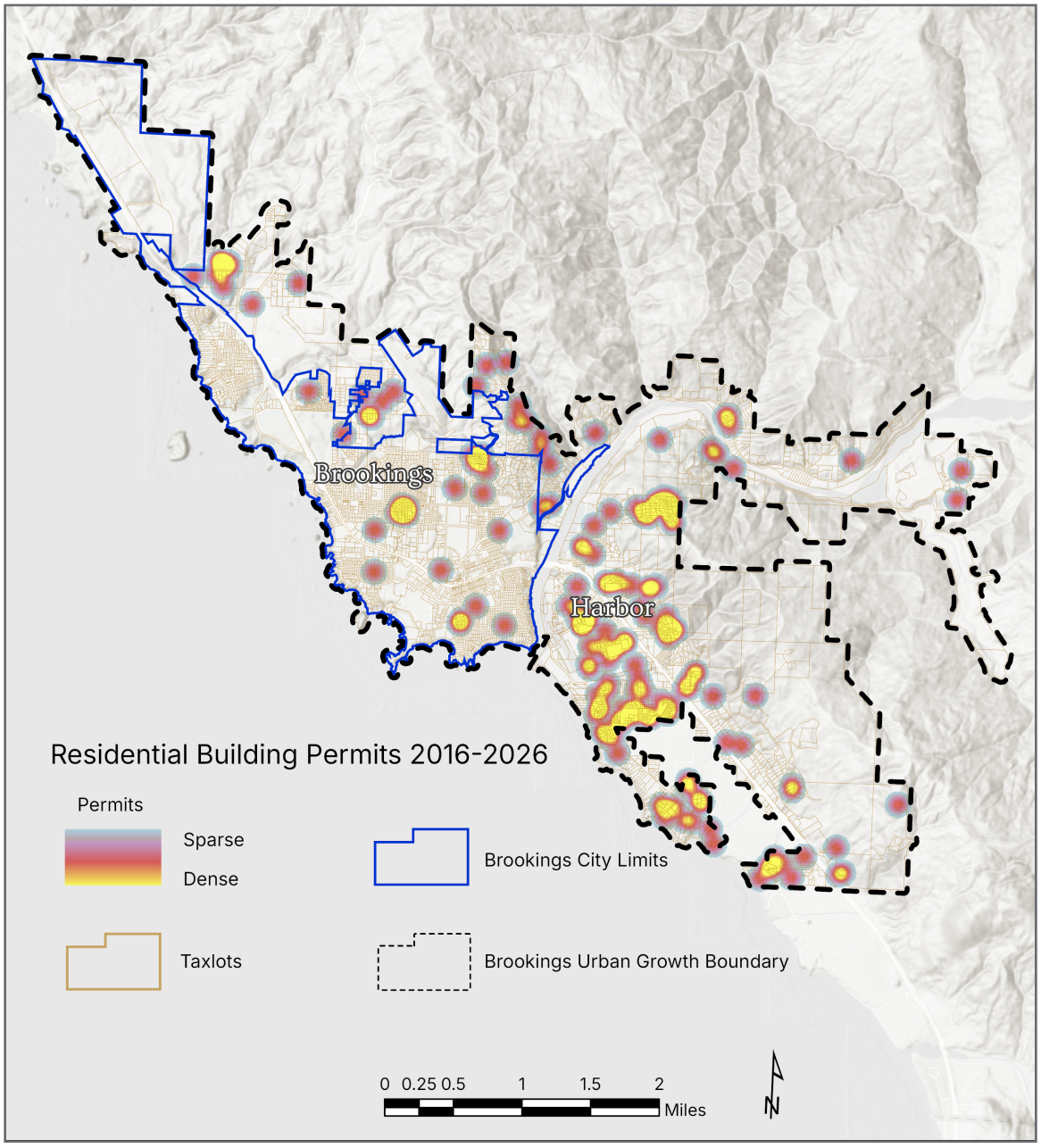


Figure 3-5: Brookings UGB Building Permit Activity, 2016-2026. Data Sources: Curry County, Lane Council of Governments, City of Brookings, Accela

RESIDENTIAL DENSITY

As discussed previously in the "Residential Lands" section of the RBLI, the City of Brookings land development code (BLDC) has 15 zones that permit residential development through clear and objective land use decision processes. In addition to these, the Master Plan Development District (MPD) allows residential uses permitted by right in R-1, R-2, R-3, C-2, C-3, and C-4 zones.[32] Brookings only has one MPD, Lone Ranch, which is planned as a large mixed use neighborhood with a range of housing types (including 540 single detached, 150 single attached, and 310 multifamily dwelling units) and neighborhood serving commercial. Another MPD on Lundeen Lane is nearing completion of its land use approvals. It is purely residential, and planned for 48 total units upon buildout.

City of Brookings Residential Densities by Zone						
Zone	**Min. Lot Size (square feet)**	**Min. Lot Size (Acre)**	**Max. DU/ unit of land**	**Max. DU/ acre (net)**	**Actual Observed Density (DU/net acre)**	**RBLI Density Category**
SR 20,000	20,000.00	0.46	1.00	2.18	1.39	Low
R-1-6	6,000.00	0.14	1.00	7.26	3.10	Low
R-1-8	8,000.00	0.18	1.00	5.45	4.66	Low
R-1-10	10,000.00	0.23	1.00	4.36	2.24	Low
R-1-12	12,000.00	0.28	1.00	3.63	0.28	Low
R-MH	6,000.00	0.14	1.00	7.26	4.88	Low
R-2	6,000.00	0.14	2.00	14.52	4.99	Medium
R-3	6,000.00	0.14	4.00	19.36	8.99	High
C-3	None	None	None	None	7.31	High
C-4	None	None	None	None	0.80	High

Table 3-5: City of Brookings Residential Densities by Zone

Analysis of observed residential densities reveals a wide difference between the maximum density allowed in each zone, and actual development. The R-1-6 zone has an observed density of less than half of what is permitted: 3.10 DU/net acre compared to 7.26 DU/net acre.

More recent development on R-1-6 zoned land has occurred at higher than historical densities. The three residential subdivisions approved since 2016 had the following density characteristics:

- The gross residential density for 94 total units on 23 (gross) acres of R-1-6 zoned land is 4.15 du/gross acre and 5.22 du/net acre.

- Net to gross factors for these subdivisions ranged from 0.23 to 0.30, with an average across all three subdivisions of 0.26. In other words, for every 1 acre of land that is developed (a lot, for example, in a subdivision), another 0.26 acres is required for public rights-of-way, open space, etc.

As mentioned throughout this report, R-1-6 is the most prevalent low density zone in the City of Brookings. Given the trend toward higher densities in this zone, it is reasonable to assume that future low density development in the City of Brookings will average around 5 units/net acre across its 6 low density residential zones, with gross to net factor of 0.30. This results in an overall planned gross residential density of 3.85 dwelling units/ acre.

R-2 and R-3 properties have also developed under maximum densities, but (in the case of R-3) are trending toward higher density. Closer study of

32. BLDC 17.70.030.A – B

two R-2 zoned areas found a gross density of 4.78 units/acre and a net density of 6.09 units/acre. The net to gross factor for these two cases ranged from 0.30 to 0.25, with an average of 0.28. On the other hand, medium density development planned for the Lone Ranch MPD has a calculated density of 13.6 units/net acre. Considering historical densities on R-2 land and planned density for Lone Ranch, it is reasonable to assume that medium density development in the City of Brookings will average around 8 units/net acre in R-2, with gross to net factor of 0.25. This results in an overall planned gross residential density of 6.4 dwelling units/acre.

Recent development on R-3 zoned land demonstrates a trend toward higher density development. The recently completed first phase of the "Ocean Winds" townhomes, achieved a gross density of 15.15 units/acre and a net density of 15.94 units/acre. This extremely efficient development had a net to gross factor of only 0.05. While anomalously low (the development is located at the end of a cul-de-sac and does not have much street frontage), it does demonstrate how higher density development typically requires less additional land for public improvements (mostly public right-of-way). Older multiunit development in Brookings is lower density. Pacific View Gardens, for example, has a net density of 7.81 units/acre and a gross density of 6.4 units/acre, with a net to gross factor of 0.22. While this net to gross factor is a more reasonable assumption for future R-3 development, the Ocean Winds development provides a more plausible density assumption for future development in the R-3 zone. At nearly 16 units/net acre, it is also consistent with planned higher density development in Brookings' two approved MPD, the Lone Ranch and the Bedrock Estates MPD (14 units/net acre and 12.54 units/net acre, respectively).

PROJECTED HOUSING DEMAND

Two different approaches were utilized to estimate needed housing in Brookings' UGB. The first is a conventional approach based on the PSUPRC population forecast.

Table 3-6 provides estimates for the number of dwelling units needed to meet housing demand based on population forecasts by the Population Research Center at Portland State University at 7, 10, 14, and 20 year intervals from the base year of 2026. For example, between 2026 and 2033, a total of 248 new dwelling units will be needed after accounting for the number of individuals who are anticipated to reside in group quarters and a vacancy rate of 8.7%. Likewise, from 2026 to 2046, almost 500 additional homes will be needed in Brookings UGB according to these projections.

Needed Housing Projections				
Forecast Year	**2033**	**2036**	**2040**	**2046**
Projected Population	12,406	12,548	12,692	12,861
Population Change from 2026	478	620	764	932
Population in Group Quarters	10	13	16	20
Projected Population Change Less Group Quarters	467	606	747	912
Median Household Size[33]	2.05	2.05	2.05	2.05
# Needed DU	228	296	365	445
Vacancy Rate[34]	8.70%	8.70%	8.70%	8.70%
Total New Units Needed	248	322	397	484

Table 3-6: Needed Housing Projections. Data Source: 2020-2024 ACS 5-Year Estimate, Tables B25136, S1101, and B26001. Calculations and analysis by Green Top PDR.

33. Household size is a weighted composite combining Census reported median household sizes for the City of Brookings and Harbor CDP. Weights were based on relative population size.
34. Vacancy rate is a weighted composite combining Census reported vacancy rates for the City of Brookings and Harbor CDP. Weights were based on relative number of total dwelling units in each community.

The next step in measuring housing demand is to calculate the number of units needed by income group. These groups and the proportion of the population assigned to each were presented in the Technical Memorandum #1. Households were placed into groups approximating "standard" income groupings commonly used in housing policy and programs.

Table 3-7 presents the number of units needed over 10 and 20 year periods to meet the housing needs within each category, based on the PSUPRC Forecast.

Needed Housing Projections by Standard Income Group						
		Income Group				
Forecast Period	Total New Units Needed	0-30% AMI	31-60% AMI	61-80% AMI	81-120% AMI	>120% AMI
2026-2036	322	42	64	55	45	116
2026-2046	484	64	96	82	67	174

Table 3-7: Needed Housing Projections by Standard Income Group. Data Source: 2020-2024 ACS 5-Year Estimate; PSUPRC Population Forecast. Calculations and analysis by Green Top PDR.

As discussed in Technical Memorandum #1, the Oregon Housing Needs Analysis (OHNA) allocates housing production targets for every city in Oregon. The OHNA set a much higher production target for Brookings than projected housing demand based on the PSUPRC forecast that is presented above: 1,915 units over the next 20 years. This target accounts for factors that are not considered in the PSU target, including

- The impact of short term rentals and second homes (a significant issue facing coastal communities like Brookings);
- Historic underproduction; and
- The need for housing for unhoused people.

Using both figures, it can reasonably be concluded that at least 484 and as many as 1,915 new homes will be needed to meet demand for housing in Brookings' UGB over the next 20 years. The OHNA production target is also broken down into the same five income groups.

Table 3-8 presents the total production target and production targets for each of these income groups over the next 20 years. Higher income households earning more than $90,000 a year (120% of AMI) represent the single largest driver of housing demand over the next 20 years, generating a need for a little more than 31% of the production target. They are followed by middle income households that earn between $60,000/year and $90,000/year (roughly 80-120% of AMI) that represent about 24% of the production target. Lower and moderate income households earning less than $60,000/year (80% of AMI) account for approximately 44% of projected housing demand.

Needed Housing Projections by Standard Income Group						
		Income Group				
Forecast Period	Total New Units Needed	0-30% AMI	31-60% AMI	61-80% AMI	81-120% AMI	>120% AMI
2026-2046	1,915	381	296	174	467	597

Table 3-8: Needed Housing Projections by Standard Income Group. Data Source: Oregon Housing Needs Analysis.

Table 3-9 summarizes the current or historic residential development in the City of Brookings and extrapolates how many units in each of the five different housing type categories would be needed to be developed to meet the OHNA production target of 1,915 in 2026.

Brookings UGB Housing Demand by Unit Type and Tenure					
Housing Demand by Housing Type	**Current/ Historic % Owner**	**Current/ Historic % Renter**	**Projected Demand--Owner**	**Projected Demand--Renter**	**Total Projected Demand**
Single-Detached	54.27%	6.46%	1,039	124	1,163
Single-Attached	2.44%	11.25%	47	215	262
Middle	2.14%	14.13%	41	271	312
Higher Density (10+)	0.37%	7.57%	7	145	152
Manufactured	0.60%	0.77%	12	15	26
	59.83%	40.17%	1,146	769	1,915

Table 3-9: Brookings UGB Needed Housing Projections by Unit Type and Tenure. Data Source: 2020-2024 ACS 5-Year Estimate; Oregon Housing Needs Analysis. Calculations and analysis by Green Top PDR.

As reported previously in TM1, approximately 60% of Brookings existing housing inventory are single detached units and 40% are other types. Among those other types, single attached units (townhomes) represent roughly 14% of all units. Middle housing types (duplexes, triplexes, cottage clusters, and small apartment buildings) represent another 16%; manufactured homes, on the other hand, represent a very small proportion.

Future residential development, however, is likely to diverge from this pattern over the next 20 years. The aging population and smaller households discussed above, and other factors, will increase demand for smaller units developed at higher densities. Additionally, the OHNA income group distribution presented in Table 8 above also suggests that there is significant demand among lower and moderate income households earning less than 80% of AMI. This will increase demand for medium and higher density housing types that are more affordable to these households. At the same time, the OHNA shows strong demand among middle and upper income households that may prefer single detached homes at lower densities.

Table 3-10 presents a housing demand outlook that balances historic development patterns with the projected future demand of a changing community. In doing so, it is aligned with the need for more smaller units that will be attractive to smaller, aging households and households that need more attainable housing options. At the same time, it accounts for demand for larger units for families with school-aged children.



Brookings UGB Projected Housing Demand by Development Density		
Housing Allocation by Density and Income Group	**Projected Units as a % of Total Growth 2026-2046**	**Projected # Units 2026-2046**
Low Density (8 DU/net acre or less)		
30% AMI, Max. Income $22,480	1.85%	35
30 – 60% AMI, Max. Income $44,960	1.92%	37
60 – 80% AMI, Max. Income $59,946	2.82%	54
80 – 120% AMI, Max. Income $89,920	12.11%	232
> 120% AMI	23.21%	445
Subtotal Low Density	**41.91%**	**803**
Medium Density (9-16 DU/net acre)		
30% AMI, Max. Income $22,480	11.91%	228
30 – 60% AMI, Max. Income $44,960	9.25%	177
60 – 80% AMI, Max. Income $59,946	5.17%	99
80 – 120% AMI, Max. Income $89,920	10.95%	210
> 120% AMI	7.00%	134
Subtotal Medium Density	**44.29%**	**849**
High Density (more than 16 DU/net acre)		
30% AMI, Max. Income $22,480	6.15%	118
30 – 60% AMI, Max. Income $44,960	4.29%	82
60 – 80% AMI, Max. Income $59,946	1.08%	21
80 – 120% AMI, Max. Income $89,920	1.55%	30
> 120% AMI	0.74%	14
Subtotal High Density	**13.81%**	**265**
	TOTAL	**1,917** [35]

Table 3-10: OHNA Aligned Brookings UGB Projected Needed Housing by Development Density. Data Source: Oregon Housing Needs Analysis. Calculations and analysis by Green Top PDR.

Residential development in the next 20 years under this scenario assumes a majority of housing demand for households earning over 80% of AMI would be met through single detached homes built on low density zoned land. Lower density housing options affordable to lower and moderate income households are assumed to be met through cottage clusters and manufactured housing.

Medium density residential would provide significant opportunities for lower and moderate income households to own or rent small lot single unit detached,[36] townhomes, and middle housing types ("plexes" and multiunit buildings with fewer than 10 units).

35. The total is slightly different than the total units projected by the OHNA (1,915) due to rounding in the underlying calculations.
36. Small lot single unit detached housing includes cottage clusters and small footprint detached homes on lots that range from 2,700 square feet (0.06 acres) to 4,000 square feet (0.09 acres).

Projected Dwelling Units by Type 2026 - 2046

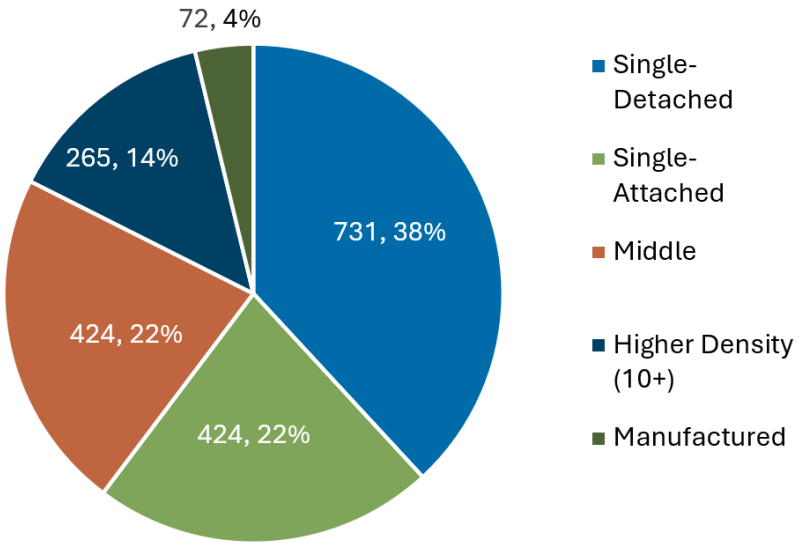


Figure 3-6: OHNA Aligned Brookings UGB Projected Needed Dwelling Units by Type. Data Source: Oregon Housing Needs Analysis. Calculations and analysis by Green Top PDR.



> "To build a vibrant community, one must consider housing for our young people and our workforce that matches their income."
>
> *HNA Survey Respondent*

RESIDENTIAL LAND CAPACITY & SUFFICIENCY

The capacity of residential land within Brookings' UGB to accommodate the development of needed housing is evaluated by comparing the demand for housing estimated above with amount of land that is available for development. This step uses the results of the Residential Buildable Lands Inventory presented in Technical Memorandum 2 as the basis for this analysis.

First, the demand for housing units calculated above is converted into demand for residential land using average densities discussed earlier. In addition to land for dwelling units (for example, a buildable residential lot on which a house can be constructed), land is included for uses supportive of and necessary to residential development. This process of converting "net developable" residential land to "gross developable" residential accounts for things like land for public rights-of-way for roads and sidewalks. The outcome is a more realistic accounting of how much land is actually needed for housing.

For this particular land sufficiency analysis, homes that have been planned and entitled within the Lone Ranch MPD were removed from needed units. The developable land area of Lone Ranch documented in the RBLI was likewise removed from the RBLI for the purposes of calculating needed developable residential land.

Brookings UGB Projected Residential Land Demand							
Residential Land Density	**Total Needed Units**	**Planned Lone Ranch Units**	**Total Needed Units Less Lone Ranch**	**Average Development Density (DU/ net acre)**	**Needed Residential Land (net acres)**	**Net to Gross Factor**	**Developable Residential Land Needed (gross acres)**
Low	803	540	263	5.00	52.64	0.30	68
Medium	849	150	699	8.00	87.35	0.25	109
High	265	310	-45	16.00	-2.83	0.20	-3
	1,917		917		137.16		174
Average residential density for 2026-2046 planning period (DU/gross acres)					5.26		

Table 3-11: Brookings UGB Projected Needed Residential Land by Development Density. Calculations and analysis by Green Top PDR.

As shown in Table 3-11, after the entitled capacity of Lone Ranch is accounted for, there is a need for

- Nearly 53 net acres, 68 gross acres, of low density residential land
- Over 87 net acres, 109 gross acres, of medium density residential land
- There is a surplus of nearly 3 acres of high density residential land. Lone Ranch, with its planned 310 high density units, provides slightly more high density residential capacity than is currently needed.

The next, and final, step in this analysis is to determine whether the Brookings UGB currently has enough land to meet these needs. Land within the city limits is considered first, because it is currently served by urban services and infrastructure or is more likely to be served in the first 7 – 10 years of the planning period.

Brookings UGB Land Sufficiency			
City of Brookings	**Developable Residential Land**	**Needed Residential Land**	**Surplus/Deficiency City of Brookings**
Low	102.74	68	34
Medium	25.17	109	84
High	24.62	-3	28

Table 3-12: Brookings UGB Land Sufficiency—Brooking City Limits. Calculations and analysis by Green Top PDR.

With nearly 103 acres of developable low density residential land in the City of Brookings, there is an overall surplus of 34 acres of low density residential land. However, there is not enough developable medium density residential land in the City of Brookings. With only 25 developable acres of medium density land remaining, there is an 84 acre deficiency of medium density residential land in the City of Brookings. With Lone Ranch's current entitlement for high density residential development, there is currently a surplus of 28 acres of high density residential in the City of Brookings.

Developable residential land in the unincorporated UGB is then considered, resulting in surpluses in all residential land categories: 222 acres of low density, 21 acres of medium density, and 39 acres of high density residential land.

Chapter 4. Conclusions and Implementation

SUMMARY

The City of Brookings and its Urban Growth Boundary are experiencing slow but steady population growth. Some of this growth is driven by Brookings' appeal as a recreational and retirement destination, but it is also propelled by its position as a center for regional commerce. And even with an aging population, Brookings continues to be a community where families raise children.

Meeting Brookings' housing needs over the next 20 years will require balancing these sometimes-competing interests. A total of as many as 1,915 new homes will be needed throughout Brookings' UGB during this period. In order to provide housing that meets the needs of current and future residents, different types of housing will need to be developed. This will require a shift from past development patterns that focused on construction of single detached homes to middle and higher density housing types. Although "plexes", townhomes, cottage clusters, and small apartment developments will constitute a larger share of Brookings' overall housing inventory, single detached homes will also be needed. Smaller single detached homes built on smaller lots could provide homeownership opportunities that are affordable to a range of smaller households that are seeking amenities like a private yard. Manufactured and other kinds of prefabricated housing built on individual lots are in manufactured housing parks could also provide similar opportunities.

While many of the factors that influence housing development (mortgage rates, the costs of construction materials and labor, for example) are beyond the control of the City of Brookings and its residents, there are steps that can be taken to address these challenges. The following identifies eight (8) strategies that the City of Brookings could pursue in its efforts to promote housing production within its UGB. These policies were selected and prioritized based on their potential impact, feasibility, and input collected from the stakeholder advisory committee and the members of the public.

Strategies are divided roughly into three groups. Four economic strategies focus on reducing or managing development costs in ways that can encourage and accelerate housing production. Two regulatory strategies address opportunities to make housing development easier and assess the impact of short-term rentals (STRs) on Brookings' existing housing inventory. Policy & Partnerships focus on actions that explore important issues raised by the HNA that are beyond Brookings' direct control.

STRATEGY 1

System Development Charge Reductions

Category

Economic

Problem Addressed

System Development Charges, while a necessary System Development Charges, while a necessary funding mechanism for public infrastructure supporting development, add considerable expense to the cost of a home. According to the 2025 SDC update study, a single detached home would be assessed nearly $20,000 for water, sanitary sewer, stormwater, and transportation SDCs. This may be even more of an impediment to the development of housing types with smaller profit margins, such as middle and higher density multiunit housing. SDC reduction programs have been effective in encouraging housing production, perhaps most notably programs targeting ADUs in Bend, Portland, and Medford. The City of Tigard has operated an SDC exemption program for regulated affordable housing since 2018. It has observed positive results according to city staff. Responses to public outreach and stakeholder input identified rising development and construction costs as an obstacle to housing development. Programs to reduce or waive SDCs for particular types of housing can encourage production. It will be important for the City to design a program that focuses on housing types that might not otherwise be developed without this incentive program.

Priority: High

Reducing SDCs for specific types of housing can stimulate development by making a particular housing more financially feasible for private for profit and not-for-profit developers. The impact can be particularly meaningful for housing for middle income households where costs are higher relative to potential returns.

Implementation Timeframe

1-2 years

Benefits/Costs

Reducing or eliminating SDCs can reduce funding for planned public improvements. This of course assumes 1) that projected funding for planned public improvements relied on the development of projects like the one for which SDCs are not collected and 2) that foregone SDCs are not paid from other sources. For example, a jurisdiction could develop a housing fund with general fund resources and use the fund to offset or eliminate SDCs for particular projects.

Key Issues

1. Establishing a legal basis for SDC exemptions/ reductions for specific types of housing if SDCs will not be repaid to enterprise funds through general fund or other funding sources.
2. Developing a process and standards for evaluating and awarding requests.

Implementation Actions

1. Local policy and program development & implementation.
2. Project development and selection.

STRATEGY 2

Annexation Incentive Program

Category

Economic

Problem Addressed

Annexation of vacant and partially vacant properties into the City of Brookings is essential for the buildout of the Brookings UGB in a way that provides a range of housing types over the 20 year planning period. Properties that are adjacent to existing urban development or in areas experiencing development represent opportunities for the City to add substantially to its housing inventory.

Smaller tracts of land are often owned by individuals who are not developers and are hesitant to take on the significant upfront costs to entitle land for future development. They might also be reluctant to bear the cost of increased property taxes once land has been annexed. The City could identify properties meeting certain programmatic characteristics (size, proximity to existing infrastructure, and estimated long term cost to serve) and offer to annex and zone properties free of charge. As an additional incentive, the City could offer to phase in its millage as permitted under ORS 222.111(3).

Priority: High

Implementation Timeframe

1-2 years

Benefits/Costs

The cost of land use entitlements and additional real estate taxes represent relatively small costs in absolute terms for large developments, but are more significant for smaller developments that are more likely to be undertaken by developers that may lack resources and expertise. Reducing upfront land use entitlement costs and additional carrying costs may encourage property owners to annex, making their land available for development in the near term.

Phasing property taxes does have a fiscal cost, but may be relatively insignificant compared to the longer term fiscal benefits that would not have been realized but for the program. Waiving land use fees also carries a fiscal cost, but is likely to be offset in the long run by generation of new property taxes, user fees, and SDCs.

The City of Medford implemented an entitlement support program that provided higher density residential infill properties with free of charge zone changes. The program has been relatively successful at preparing properties that are owned by individuals for residential development that would have otherwise remained underdeveloped.

Key Issues
1. Develop process and standards for evaluating proposals. Consider an annual process that identifies candidate properties with a high likelihood of participation and delivery of new dwelling units.
2. Establish program features that reasonably manage fiscal impacts.

Implementation Actions
1. Policy and program development & implementation.
2. Project development and selection.

STRATEGY 3
Middle Income Revolving Loan (MIRL) and Multiple Unit Property Tax Exemption (MUPTE)

Category
Economic

Problem Addressed
Housing that is affordable to middle and lower income households is often the most expensive to produce on a per unit basis and has the slimmest profit or operating margins. Offsetting or reducing costs of production and/or ongoing operations (in the case of rental housing specifically) can encourage not-for-profit and for-profit developers to build when they might not otherwise.

Responses to public outreach efforts (surveys and tabling events) and stakeholder input consistently identified the need for "workforce" housing. In a local economy that is increasingly dependent on lower wage service industry jobs, workforce housing needs to be affordable to middle and lower income households.

According to the Oregon Department of Housing and Community Services, MIRL has only been implemented by Tillamook County. MUPTE, on the other hand, has been used extensively throughout Oregon in cities like Portland, Salem, Eugene, and Medford where it has been used to support the development of thousands of higher density units.

Priority: High
Aside from the potential effectiveness of these strategies to incentivize the development of certain housing types, they afford local jurisdictions considerable discretion and flexibility in their design and implementation. This is particularly true for MUPTE, which does not directly involve the State of Oregon as MIRL does.

Implementation Timeframe
2-5 years

Benefits/Costs
Both of these policies can provide meaningful economic incentives for developers to pursue desired projects, and as mentioned above, both policies allow for considerable local participation in program design and implementation. MUPTE does require cooperation from taxing jurisdictions in order to be most effective, which can be difficult politically. MIRL does require the direct involvement of the Oregon Department of Housing and Community Services (OHCS), and is a new, relatively untested program. Both programs do require that participating jurisdictions forego property taxes for a period of time, and both programs require ongoing monitoring and reporting, which requires a longer term staffing commitment. Unlike MUPTE, MIRL does not have buy-in requirements from participating taxing jurisdictions enabling program participants (local jurisdictions and developer partners) the use of the entire property tax millage.

Key Issues
1. For MUPTE, jurisdictions must establish a geographic boundary within which the program may operate. Otherwise, the program can only be used for regulated affordable housing development.
2. Understanding and then managing potential fiscal impacts of foregoing future property tax revenue for a period of time
3. Developing a process and standards for evaluating and awarding requests.

Implementation Actions
1. Local policy and program development & implementation.
2. Project development and selection.
3. Monitoring & reporting.

STRATEGY 4
Local Public Infrastructure Funding Options

Category
Economic

Problem Addressed
Aside from SDCs, the actual costs incurred to construct infrastructure for residential development are substantial. Roads, water, sanitary sewer, and stormwater management are one of the most significant cost components for new (especially greenfield) development. Unless identified as a publicly funded improvement project paid with SDCs or other public funds, these costs are borne entirely by private developers who, in turn, pass those costs on to homebuyers and renters.

Alternatively, private developers and municipalities can partner to deliver necessary public infrastructure, reducing up front development costs and accelerating development. In this arrangement, the public entity constructs infrastructure and is repaid through a Local Improvement District (LID) over time as properties are sold and/or through a special tax levy.

Priority: Medium
Of the three economic strategies, this may be the most complicated, requiring close coordination between an interested developer, the City of Brookings, and (likely) the State of Oregon. It is also highly contingent on development project timing. This strategy also involves the most fiscal risk for the municipality.

Implementation Timeframe
5-10 years

Benefits/Costs
LIDs can accelerate delivery of costly public improvements that otherwise discourage private development or make projects infeasible altogether. They work best when there are relatively few affected properties and agreements among those property owners can be easily reached. Large, greenfield development sites are best suited to this strategy as opposed to smaller infill projects. The public entity does need to have up front funding available for the project, but there are options if it does not. The public entity is also at risk if the development is not completed and/or private property owners are not able to pay the special levy.

Key Issues
1. Managing risk of default or other failure of the private developer to complete a project and/or repay the municipality.
2. Identifying project funding.

Implementation Actions
1. Identify public infrastructure projects needed for housing development that may benefit from this strategy, and engage property owners to create awareness.
2. Engage relevant State of Oregon departments and agencies to identify funding for up front project costs.

STRATEGY 5
Land Development Code Audit

Category
Regulatory

Problem Addressed
In order to achieve the planned residential development outcomes described in the Housing Needs Analysis, the Brookings Land Development Code should be evaluated holistically to ensure that it is optimally usable by the development community (which is responsible for housing production), provides a high level of certainty to both developers and the community at large, ensures a high level of efficiency in the land use entitlement process, and uses clear and objective standards while allowing for flexibility.

Priority: High
An audit would likely identify at least some changes to the code that would result in efficiencies both for the development community and city staff. Additionally, changes to the code that support development of certain kinds of housing should occur before opportunities are missed.

Implementation Timeframe
2-5 years

Benefits/Costs
Code changes often achieve benefits over the long term, if not immediately. But changes may have more immediate benefits to both developers and the city. This project could be grant funded, making it a relatively low cost (to the city) initiative with significant benefits.

Key Issues
1. The level of review (ministerial, administrative, quasi-judicial, and legislative) should be considered with the intention of using the most efficient review process possible.
2. The Code should also be evaluated for its ability to achieve minimum residential densities assumed by the capacity analysis of 5 dwelling units/net acre for low density, 8 dwelling units/net acre for medium density, and 16 dwelling units/net acre for high density.
3. Establishing regulatory minimum residential densities should be seriously considered for all residential zones (not including commercial zones where mixed use residential is permitted).
4. Regulatory reforms that encourage medium density (middle housing types) should be a priority.

Implementation Actions
1. Identify and secure grant funding
2. Retain consultant to compete project
3. Public process for amendments
4. Develop information resources that explain City permitting processes to reduce barriers for non-expert developers like homeowners interested in ADUs.

STRATEGY 6
Short Term Rental Policy Assessment

Category
Regulatory

Problem Addressed
STRs utilize housing that may be otherwise occupied by permanent residents. Although there are relatively few STRs in the City of Brookings (80 current, active Conditional Use Permits), they may disproportionately impact townhomes, a middle housing type that can provide affordable rental housing for a range of households, including families with younger children, and homeownership opportunities for moderate and middle income households. Whether or not STRs appreciably remove dwelling units from the local housing market that would otherwise be occupied by full time resident homeowners or renters is an open question, but comments gathered through the public outreach process indicate that it is commonly held belief that they do.

STRs do, however, support tourism, which is a very important part of the local economy. Finding a balance between reserving housing for full time residents (particular low and middle income households) and supporting tourism would be the goal of this of initiative.

Priority: Medium
Brookings currently regulates STRs through a Conditional Use Permit and requires annual registration for permitted STRs. The expense of the CUP is not inconsequential, and a CUP is a discretionary land use action that does not provide certainty of approval. Approvals may also conditioned to mitigate negative impacts attributed to an STR, which may have the effect of adding considerable up front costs for someone seeking approval. That said, Brookings has not systematically reviewed the effectiveness of the program and the program was never designed to achieve an optimal number of STRs in the first place. The HNA did identify a potential disproportionate impact on middle housing types that are an important component of Brookings future inventory.

Key Issues
1. Measuring impact of STRs on housing inventory with particular concern for impacts to high priority housing types (middle and high density).
2. Determining an acceptable balance between the benefits of STRs to property owners and the tourism industry and the production and preservation of needed housing types.

Implementation Timeframe
2-5 years

Benefits/Costs
Whether program assessment results in change is largely a political question for City decision makers. An assessment could support improvements to the program and help the city avoid a situation where the STR market suddenly expanded.

Implementation Actions
1. Identify and secure grant funding
2. Retain consultant to compete project
3. Public process for amendments

STRATEGY 7
Annexation and UGB Analysis

Category
Policy and Partnerships

Problem Addressed
Outside of the Lone Ranch MPD, there are relatively few large developable tracts of residential land in the City of Brookings. Although infill development will meet some of the projected need for residential development over the next 20 years, urbanization of residential land in the unincorporated UGB is an important consideration as well. Large, systematic annexations can be politically fraught and very challenging. At the same time, incorporation of particular parts of the unincorporated UGB may be an effective way to realize more residential development in the UGB than would have been possible under county jurisdiction. It would also be necessary in the event that Brookings ever considered adjusting its UGB to include land adjacent to the southern edge of the current UGB.

Priority: Medium
The City of Brookings has analyzed the potential annexation of Harbor before and determined that annexation was not feasible at the time. In addition, annexation may not even be possible under current state law. In any event, the eventual buildout of newly incorporated lands would likely be a long range solution.

Key Issues
1. Financial feasibility of annexation is an important consideration for the City of Brookings which would assume significant financial liability for infrastructure in annexed areas.
2. Understanding the political likelihood of annexation may be difficult, but it would be beneficial before pursuing other actions.

Implementation Timeframe
5-10 years

Benefits/Costs
Other strategies, like those recommended here, are likely to be more effective short and medium term solutions. For example, if the development of Lone Ranch proceeds relatively quickly, with significant progress over the next 5-10 years, annexation of the unincorporated at any significant scale may not be necessary. If, however, development within the City of Brookings is unable to achieve the City's goals for housing production, this may become a necessary strategy.

Implementation Actions
1. Identify funding for and commission a study to assess the feasibility of annexation of significant portions of the unincorporated UGB—particular those that represent opportunities of medium and higher density housing.

STRATEGY 8
Homelessness Action Plan

Category
Policy and Partnerships

Problem Addressed
Homelessness was identified as a common concern in public outreach. Data presented in the HNA suggests that homelessness is a significant issue across Curry County. As its largest city and center for service providers, the City of Brookings has an interest in the outcome of policies and programs that address homelessness.

Priority: Medium

Curry County is currently hosting a series of discussions on the topic of homelessness. The ultimate goal of this initiative is not currently known, but it could provide the City of Brookings with a better understanding of the intentions and capacities of potential partners. Brookings could apply what it learns through this process to articulate its own response and approach to homelessness.

Key Issues

1. Understanding the impact of homelessness on the City of Brookings, specifically, and its unincorporated UGB. This should include determining methodology and data sources for a more accurate measurement of the incidence of different types of homelessness and contributing factors.
2. Defining Brookings' role in the collaborative implementation of policy to reduce homelessness.

Implementation Timeframe

2-5 years

Benefits/Costs

Municipalities, particularly those that do not directly receive provide mental health and other social services, may be limited in their direct response to homelessness. That said, this could provide an opportunity to build collaborative partnerships between public entities, private service providers. Probably grant funded.

Implementation Actions

1. Participate in regional initiatives to better understand and address homelessness.
2. Pursue grant funding for an action plan.

Brookings Housing Needs Analysis
Appendix A
GIS ANALYSIS METHODOLOGY
RESIDENTIAL BUILDABLE LANDS INVENTORY (RBLI)

1. Introduction and Purpose

This appendix documents the geographic information system (GIS) methodology used to produce the Residential Buildable Lands Inventory (RBLI) supporting the City of Brookings Housing Needs Analysis (HNA). It is a companion to Technical Memorandum 2 (TM2), which presents the inventory results and the resulting residential land supply findings. Where TM2 reports what the buildable land supply is, this appendix documents how it was derived- the data sources, coordinate framework, classification logic, and constraint analysis behind the acreage figures in the memorandum.

The analysis is limited to residential land within the Brookings Urban Growth Boundary (UGB). It follows the buildable lands inventory method established in OAR 660-038 (Housing Needs Analysis) and the related administrative rules and statewide planning goals summarized in Section 2. All spatial analysis was performed in ArcGIS Pro; results were published to ArcGIS Online for internal review and public access as described in Section 12.

2. Regulatory Framework and Data Crosswalk

Each element of the inventory traces to a specific rule, statute, or statewide planning goal. The crosswalk below maps each authority to the analysis it requires and the GIS data used to perform that analysis.

Authority	Required analysis	GIS data used
OAR 660-038-0040	Identify residential land	Tax lots, zoning
OAR 660-038-0050 / -0060	Net buildable acres and capacity by density	Buildable lands result, density assumptions
OAR 660-038-0070(1)(d)	Slope > 25% on ≥ 1 contiguous acre as physical constraint	LiDAR-derived slope constraints
OAR 660-024 / -024-0050	UGB land supply	UGB boundary, taxlots
OAR 660-008-0100	Coastal shoreland use standards (Goal 17)	Shoreland management area polygons
Goal 16	Estuarine resource areas excluded from supply	Estuary management units / NWI estuarine classes
Goal 18	Beach-and-dune areas	Active beach / dune areas
ORS 197A.270	Residential lands study scope within UGB	UGB boundary, comp plan / zoning
ORS 197A.350	Housing Production Strategy developability inputs	Service areas, parcel size, access

3. Data Sources and Vintage

The inventory draws on the following authoritative datasets.

Dataset	Source	Vintage	Use
Tax lots and assessor attributes	Curry County Assessor	2026 hosted feature service	Base parcel geometry and residential attributes
Bare-earth LiDAR (DEM)	DOGAMI OLC South Coast	2008–2009	Slope derivation
Wetlands (NWI)	USFWS National Wetlands Inventory	2026 hosted feature service	Environmental constraint
Wetlands (state)	Oregon Dept. of State Lands	2026 hosted feature service	Environmental constraint
Flood hazard (NFHL)	FEMA Map Service Center	2026 hosted feature service	Constraint / reference
Coastal & geologic hazards	DOGAMI	2026 hosted feature service	Erosion / bluff reference
Estuary management units	Oregon Estuary Plan Book (DLCD/DSL)	2026 hosted feature service	Goal 16 exclusion
Aerial imagery	USDA NAIP/NAIP	2024	Visual verification baseline
Zoning	City of Brookings/ Curry County	2026 hosted feature service	Land-use basis (see Section 6)

4. Coordinate System and Measurement Conventions

All spatial data were projected to and analyzed in NAD 1983 (HARN) StatePlane Oregon South, FIPS 3602, International Feet (EPSG/WKID 2914). Every area figure reported in the inventory was computed directly from GIS geometry in this projection rather than transcribed from published or online sources.

Consistently projected geometry keeps the inventory internally consistent and makes every total in TM2 reproducible. Minor differences between GIS-computed boundary acreages and published figures are expected and are attributable to right-of-way treatment, the exclusion of non-taxlot water bodies such as the Chetco River, and differences in projection and measurement basis.

As part of preparing the tax lot base, recorded assessor acreage was evaluated against the GIS-calculated area for each parcel. Per-parcel deltas were measured, and the parcels showing a substantive difference were identified, investigated, and resolved. Across the inventory the deltas were nominal and consistent with the expected variance between deeded or assessed acreage and geometry-based measurement. This analysis supports the use of GIS-calculated acreage in this projection as the basis for all area figures reported in the inventory.

5. Tax Lot Base Preparation

The inventory is built on a tax lot layer derived from Curry County Assessor parcel data and maintained in the project geodatabase. Preparation intersected the county taxlots to the Brookings UGB, removed null geometries, de-duplicated coincident polygons (discussed below), and reconciled the records so that each tax lot resolves to a single inventory record. The prepared base contains 5,503 tax lots within the study area.

A notable characteristic of the source parcel data is the presence of duplicate, coincident geometries. Where a single tax lot carries more than one ownership record, the county data represents each ownership interest as its own polygon occupying the same footprint, producing stacked, "sandwiched" coincident polygons for one physical tax lot. Left in place, these duplicates would cause the same ground area to be counted more than once in acreage, constraint, and capacity calculations.

To prevent this double-counting, the coincident geometries were de-duplicated so that each physical tax lot is represented by a single shape. Ownership was not discarded in the process: a related table was produced that preserves every ownership record for all tax lots, keyed to the retained geometry by the tax lot identifier. The single retained tax lot shape is the record that carries the added attribute fields and against which all geometry (acreage and constraint overlap) is calculated, while the related table retains the full ownership detail for reference.

6. Zoning Attribution

Reliable comprehensive-plan-designation GIS data was not available for the full study area, so zoning was used as the primary land-use basis, consistent with the allowance in OAR 660-038. Each tax lot was assigned zoning through a spatial intersection of the tax lot layer with the zoning layer.

The accuracy of the zoning data itself, as derived from currently available GIS sources, is not fully characterized; the degree to which the digital zoning layer precisely reflects adopted zoning at every parcel boundary is not well understood. It is, however, the best available zoning data for the study area, and it is the same data the county and the city rely on to make land use determinations, both in the unincorporated UGB and within city limits. Using it as the basis for the inventory therefore aligns the analysis with the data of record used in local land use administration.
Many parcels are split by more than one zone; 126 tax lots carry two or three zones. To assign a single governing designation for summary purposes, a Dominant Zone approach was used: the zone occupying the largest share of a parcel's area becomes its Dominant Zone (Zone 1), with secondary and tertiary zones retained in Zone 2 and Zone 3 fields. Slivers below a 0.05-acre threshold were disregarded so that negligible boundary overlaps do not generate spurious split-zone assignments. Because residential site addresses are recorded at the tax lot level and cannot be attributed to a specific zone segment within a split parcel, density and capacity summaries use the Dominant Zone.

7. Residential Land Identification

Residential land use was defined through a reviewed residential flag (Residential Flag – Reviewed). Each tax lot's residential status was evaluated against zoning, assessor property class, and site characteristics and flagged Yes or No. Filtering to reviewed-residential parcels yields the residential inventory universe of 4,870 tax lots.

8. Buildable Lands Classification

Each residential tax lot was assigned a Draft BLI Status describing its development potential. The classifications and their definitions are given in Table X-2. Classification is based on the presence of a residential site address and structure, the developable area remaining after environmental constraints are removed, ownership, and the development pattern of comparable nearby parcels.
Vacant and Partially Vacant lands form the core buildable supply, with the single Redevelopable parcel reported as a distinct addition; Developed, Undevelopable, and Not Applicable lands fall outside the buildable supply.

Two helper fields carry the values used in supply calculations: ResFlagAdj (the reviewed residential flag) and DevAc_Adj (the adjusted developable acreage). A key filtering rule applies to any supply query: parcels are filtered on Residential Flag – Reviewed = Yes before being evaluated by BLI status.

BLI status	Definition
Vacant	No current site address or structure in residential use, and either retains development capacity after environmental constraints are removed, or comparable adjacent parcels demonstrate that development is possible.
Partially Vacant	Already carries some residential development but retains a quarter-acre (0.25 acre) or more of developable area after environmental constraints and existing on-parcel development are accounted for. When conditions appear appropriate for development to occur on fewer than .25 acres, smaller amounts of land are included as developable.
Redevelopable	Parcels with redevelopment potential. In this inventory this is the single commercial (C-3) parcel described in Section 7, brought into the residential universe as a redevelopable site.
Developed	Lands fully developed with residential use, or privately owned and fully constrained by environmental or other factors.
Undevelopable	Lands owned by a public entity — for example schools and city public-works lands — together with public and private rights-of-way.
Not Applicable	All other lands not considered, such as commercial or other uses that do not fall into the categories above.

9. Development Constraints Analysis

Physically and regulatorily constrained portions of otherwise buildable land were identified and removed from net buildable acreage. Every constraint layer used in the inventory — the same layers presented in the project web map — is enumerated in Table X-1 with its data source and its role in the analysis. The layers fall into three groups discussed below: environmental and geologic, slope, and coastal.

Constraint layer	Source / custodian
FEMA flood hazard (Special Flood Hazard Area)	FEMA National Flood Hazard Layer (Map Service Center). Regulatory Floodway and 1% Annual Chance Flood Hazard.
Slope ≥ 25% (OAR 660-038)	Green Top PDR-derived from DOGAMI OLC South Coast LiDAR (2008–09)
Landslide susceptibility: High	DOGAMI SLIDO
Landslide susceptibility: Very High	DOGAMI SLIDO
Rapidly moving landslide susceptibility	DOGAMI
Wetland: Estuarine & Marine Deepwater	USFWS NWI / Oregon DSL
Wetland: Estuarine & Marine Wetland	USFWS NWI / Oregon DSL
Wetland: Freshwater Emergent	USFWS NWI / Oregon DSL
Wetland: Freshwater Forested/ Shrub	USFWS NWI / Oregon DSL
Wetland: Freshwater Pond	USFWS NWI / Oregon DSL
Wetland: Riverine	USFWS NWI / Oregon DSL
Riparian setback	Green Top PDR- derived buffer; top of bank stream buffer from NHD flowlines, aerial, and LiDAR
County Conservation Zone ("Coastal Conservation" in TM2)	Curry County

Each layer's overlap with the tax lots is stored as an individual per-layer acreage field for transparency and documentation. These per-layer fields are not subtracted individually; the combined constraint figure used in the supply calculation is a de-overlapped union of the "combined total" layers (Section 10), so land constrained by more than one factor is counted only once.

9.1 Environmental and geologic constraints

Flood hazard, wetlands, riparian setbacks, and landslide susceptibility were compiled as constraint layers. FEMA flood hazard was taken from the National Flood Hazard Layer. Wetlands were retained by the six National Wetlands Inventory/DSL types listed in Table X-1. Riparian setbacks were generated by Green Top PDR as a variable-width buffer measured from the top of bank- 75 feet along the Chetco River and 50 feet along other streams, as required by the applicable local land development ordinance. Geologic constraints use the DOGAMI SLIDO landslide susceptibility classes (High and Very High) together with rapidly moving landslide susceptibility; the use of High and Very High as the constraint threshold is consistent with the "severely constrained" standard in OAR 660-008-0005.

9.2 Slope constraints

Slope was derived from the DOGAMI OLC South Coast bare-earth LiDAR (2008–2009, 3-foot cell). The slope work produced three outputs:

1. **State-rule constraint.** This product implements OAR 660-038-0070(1)(d): contiguous areas of at least one acre with slopes greater than 25 percent are identified as physical development constraints, with slope measured as rise over run. Slope was calculated across the study area, areas exceeding 25 percent were isolated and dissolved into contiguous patches, and only patches meeting the one-acre contiguity minimum were retained. To apply the one-acre contiguity test correctly, it was run against a slope surface that extends beyond the UGB via a buffer, so that a genuinely contiguous steep-slope area straddling the UGB line is evaluated at its true extent. Without the buffer, the UGB line could clip a large contiguous slope feature, leaving the portion inside the UGB below one acre and causing it to fail the test even though the physical feature qualifies; buffering beyond the boundary prevents this arbitrary line from disqualifying an actual constraint.

2. **Local slope-band layer.** A second product classifies the study area into four slope classes to support parcel-level flagging against the City's hillside standards. The Brookings Municipal Code (BMC Chapter 17.100) uses a 15 percent average slope as the local hillside-review trigger.

Slope class	Basis
0–14%	Below local hillside trigger
15–19%	Local hillside review (BMC 17.100)
20–24%	Local hillside review (BMC 17.100)
25% +	State physical-constraint threshold (OAR 660-038)

3. **Parcel-level hillside flag.** A third product is a flag added to the tax lots identifying properties that likely fall under the City's 15 percent hillside standard (BMC 17.100), so parcels probably subject to local hillside review can be identified directly in the inventory, distinct from the acreage-based slope-band layer.

9.3 Coastal constraints

As a coastal city, Brookings requires overlay analysis beyond zoning. Coastal shoreland management areas (Goal 17 / OAR 660-008-0100), estuarine resource areas (Goal 16), and beach-and-dune areas (Goal 18) were reviewed against the residential inventory. The County Conservation Zone is a Curry County conservation designation, labeled "Coastal Conservation" in TM2 and is used as a mapped constraint, contributing to the combined total.

10. Net Buildable Acreage

Net buildable acreage was calculated by subtracting the combined constraint surface from each parcel's gross developable area. All "combined total" layers listed in Table X-1 were merged and dissolved into a single non-overlapping surface so that land constrained by more than one factor is counted once, then intersected with the buildable tax lots; the constrained area was subtracted to yield developable acres. The result is a de-overlapped union rather than a sum of the per-layer acreages.

A professional-judgment rule was applied to parcels left with only a small developable remnant. Where subtracting environmental constraints would leave a quarter-acre (0.25 acre) or less of developable area (an amount that could technically classify the parcel as fully constrained and remove it from the buildable inventory) the parcel was nonetheless retained as buildable if it shared clear characteristics with neighboring tax lots that are already developed. In those cases, the parcel is assumed eligible for single-unit development comparable to the established surrounding development pattern. Retaining these parcels produces a more accurate representation of what is actually buildable rather than removing them as fully constrained, which would understate developable conditions where the surrounding neighborhood demonstrates that comparable development is feasible.

11. Residential Density and Capacity

Residential capacity was estimated by applying density assumptions to net buildable acres by zone and jurisdiction (City and unincorporated

UGB), examining both actual and intended density. Zones were grouped into three density categories:

Category	Threshold
Low	≤ 8 dwelling units per acre
Medium	> 8 and ≤ 16 dwelling units per acre
High	> 16 dwelling units per acre

Density summaries use the Dominant Zone for split-zone parcels. The Lone Ranch master planned development (MPD) (three South Coast Lumber tax lots totaling roughly 512.63 GIS acres) is reported as its own line rather than absorbed into a standard density category, because its planned-development character and large scale would distort per-zone density figures. These zone-based density categories are distinct from the parcel-level RBLI Primary Density Category attribute, which classifies the MPD differently; the two should not be conflated when reproducing the TM2 tables.

12. Data Delivery and Public Access

The draft inventory is published as a hosted feature layer (DRAFT_Residential_Buildable_Lands_Inventory) on the City's ArcGIS Online organization. It feeds two public-facing ArcGIS destinations: the project's Housing Needs Analysis (HNA) Hub site, and an RBLI ArcGIS Experience Builder application that presents the buildable lands map and its supporting data. The RBLI Experience Builder application is embedded within the HNA Hub site. A community housing survey was administered through Survey123, and its results were incorporated into the HNA.
As a project deliverable, a file geodatabase will be delivered to the City once the inventory is finalized. It will assemble the datasets underlying the analysis in a single package: the final RBLI tax lot layer, the Urban Growth Boundary, the city limits, the city and county zoning layers, and each of the environmental constraint layers used in the analysis. Every layer will be accompanied by appropriate metadata.

13. Limitations and Assumptions

- LiDAR vintage. Slope is derived from 2008–2009 LiDAR, the best available high-resolution elevation data for the South Coast. Slope patterns are stable over this period, but recent grading is not reflected.

- Comprehensive plan GIS. Reliable comprehensive-plan-designation geometry was unavailable, so zoning was used as the primary land-use basis, as permitted under OAR 660-038.

- Split-zone attribution. Density and capacity for split-zone parcels rely on the Dominant Zone because unit and address data cannot be attributed below the parcel level.

- Developability horizons (analysis ongoing). A set of fields estimating the developability of vacant and partially vacant land across 7-, 10-, 14-, and 20-year horizons has been added to the inventory and remains under development. This horizon analysis is not yet folded into the buildable land supply reported in TM2; it is noted here as an ongoing extension of the inventory and will be incorporated.

- Boundary acreages. GIS-computed city-limit and UGB acreages may differ from published figures as noted in Section 4.

Brookings Housing Needs Analysis
Appendix B
COMMUNITY ENGAGEMENT SUMMARY
BROOKINGS-HARBOR COMMUNITY HOUSING SURVEY AND PUBLIC OUTREACH RECORD

A. Purpose and Statewide Planning Goal 1 Alignment

This appendix documents the public engagement conducted for the City of Brookings Housing Needs Analysis (HNA) and summarizes the results of the community housing survey. It is provided in fulfillment of Oregon Statewide Planning Goal 1 (Citizen Involvement), which requires that the public be given meaningful opportunities to participate in land use planning and that the engagement process be documented as part of the record.

The engagement described here was designed to reach a broad cross-section of the Brookings-Harbor community including residents, property owners, renters, workers, seniors, and households experiencing housing instability using multiple channels of engagement types over a sustained period. The survey findings in Sections D through H, together with the stakeholder engagement summarized in Section I, reflect what the community and the project's stakeholders identified as the area's most significant housing challenges and needs. Section J organizes these findings into community-identified priorities that will inform the HNA's Targeted Implementation Framework, the chapter presenting the plan's recommended policy changes.

B. Engagement Methods and Reach

Public input was gathered primarily through an online community housing survey, supported by a multi-channel outreach effort. The survey was built in ArcGIS Survey123 and hosted on a dedicated ArcGIS Hub project site, accessible by phone, tablet, or computer. A QR code and short URL were placed on printed materials to allow quick access from flyers and in-person outreach. Both the Hub and Survey123 are available in Spanish by toggling a language selector on either URL. The channels used to promote participation are summarized below.

OUTREACH CHANNELS

- Project website (ArcGIS Hub): a public-facing site with project information, documents, and a direct link to the survey.
- ArcGIS Survey123 online survey: the primary survey tool, distributed by direct link, short URL, and QR code.
- Utility-billing email: the survey link was included in two City utility-billing communications, reaching a broad base of local households. A first distribution occurred in June 2026 and a second in August 2026.
- KURY radio: an on-air segment about the HNA encouraged residents to take the survey; the project team principles were interviewed by station staff on a segment aired the morning of July 13, 2026.
- Facebook and social media: the project and survey were promoted through the City of Brookings Facebook page. The project launched with a Facebook promotion on June 9, 2026, and the City published a Facebook post on the morning of July 13, 2026 to reinforce the KURY segment's on-air call to action. The City also provided support through its social media channels and resident newsflash emails.
- Project one-pager: a printed and digital one-page summary of the HNA was completed and distributed to explain the project and direct residents to the survey.

- Stakeholder engagement: a standing stakeholder group provided input at working meetings (see Section I, below).

- In-person community outreach: the project team engaged residents at two Music in the Park events at Azalea Park, held June 21 and July 12, 2026.

- Community-partner outreach: with stakeholder Sr. Cora Rose, the project team identified additional local organizations serving seniors, lower-income households, and housing-insecure residents (food and meal programs, income-restricted housing communities, and social-service providers) as avenues to extend the survey's reach beyond online channels. Contact was made to many of the suggested programs, though not all were reached. The Chetco Community Public Library verified posting materials in their lobby.

TRAFFIC SOURCES AND REACH

Analysis of project website traffic during the outreach period showed that social media was the leading source of visits to the project site. When Facebook's several link variants are combined, Facebook was the single largest referral channel, ahead of direct visits. A large share of the remaining "direct" traffic is attributable to "dark social": links opened from stakeholder emails, texted links, QR-code scans, and printed materials, which typically report as direct. Together, social media and email/print-driven traffic were the two dominant pathways to the survey, confirming that the multi-channel approach, rather than any single channel, drove participation.

C. Participation Timeline and Response Drivers

The survey collected 514 responses between June 8 and September 7, 2026. Participation was not steady over time; it arrived in distinct waves that align with the outreach actions above. Daily counts below bin each submission by its date.

Response Wave Event	Date	Responses
Facebook post: survey launch	June 9, 2026	110
June utility-billing distribution	June 24, 2026	118
Mid-July promotion: KURY radio segment and City Facebook post	July 13, 2026	27

The launch wave was generated by the project's Facebook promotion beginning June 9 (110 responses that day, with roughly 75 more over June 10–12 as the post continued to circulate) The consolidated response-timeline analysis attributes this wave to Facebook. The second wave was the June utility-billing distribution, which produced the single largest day (118 on June 24, plus 31 the following day). A third, smaller wave appears on July 13 (27 responses, against one to five on the surrounding days), driven by the KURY radio segment that aired that morning together with the City's Facebook post reinforcing the on-air call to action. Across all three waves, the pattern is consistent: each surge follows a specific, dated outreach action, underscoring that the multi-channel approach (social media, radio, utility-billing email, and in-person events) sustained participation. In-person outreach left a smaller but identifiable footprint as well: the first Music in the Park event at Azalea Park on June 21 corresponds to a modest same-day bump of roughly eight responses, which the consolidated analysis flagged as community outreach. There were also a small number of surveys manually added by Green Top as a result of conversations had during these outreach events.

Note on the August utility billing: a second utility-billing distribution occurred in August 2026. This export closes on August 6, 2026 and contains only two August responses, so any participation generated by the August billing is not yet captured here. The survey will close on September 1st and a full reconciliation of the surveys will occur at that time.

D. Who Responded

Participation was strong for a community of this size and skewed toward people directly connected to Brookings. Roughly seven in ten respondents live within city limits, and homeowners outnumbered renters by more than three to one, a tenure split worth keeping in mind when weighing the results. Respondents also skewed older, consistent with the area's demographics. More than half were aged 55 or older.

Respondent profile	Count
Total responses	514
Live within Brookings city limits	350 (70%)
Live in unincorporated Harbor	80
Live elsewhere in Curry County	54
Own their home	354
Rent their home	106
Live with family or others	18
Currently experiencing housing instability	14
Aged 55 or older	280 (55%)
Households with children under 18	144
Households with an adult age 65 or older	218
Substantive open-ended comments	235

Household income was distributed across the range, with meaningful representation at lower income levels: 57 respondents reported household income of $30,000 or less and 106 reported $30,000–$60,000, together roughly a third of those who answered (61 preferred not to say).

E. Most Significant Housing Challenges

When asked to name the most significant housing challenges in the area, one issue dominated: the cost of housing relative to local incomes, mentioned by more than four in five respondents. A shortage of rental housing followed clearly in second. Notably, short-term rentals reducing long-term availability ranked third, flagged by roughly half of all respondents. This is a community-driven concern that emerged strongly in the open-ended comments as well. Percentages are of the 498 respondents who answered this question; totals exceed 100% because multiple selections were allowed.

Challenge	Share
Housing costs are too high relative to local incomes	83%
Not enough rental housing available	68%
Short-term rentals are reducing long-term availability	52%
Lack of housing for people experiencing homelessness	41%
New housing development is not keeping pace with demand	39%
Not enough workforce housing	37%
Not enough housing options for seniors / older adults	36%
Too many homes in poor condition	32%

HOW RENTERS AND OWNERS DIFFER

Renters and owners agree on the top three challenges but weigh them very differently, with renters expressing markedly higher concern on each. This divergence is important for policy design, since renters are directly exposed to the cost and supply pressures the survey identifies. Totals exceed 100% because multiple selections were allowed

Challenge	Renters	Owners
Housing costs too high relative to incomes	94%	77%
Not enough rental housing available	80%	63%
Short-term rentals reducing availability	62%	48%

F. Housing Types the Community Wants More Of

Asked what types of housing the area needs more of, respondents pointed clearly toward the "missing middle" and attainable ownership: smaller and starter homes led, followed by single-family homes for purchase, apartments and multifamily rentals, and affordable or subsidized housing, each named by roughly half or more. Senior housing, condos and townhomes, transitional or emergency housing, and accessory dwelling units (ADUs) all drew meaningful support. Percentages are of the 505 respondents who answered this question; totals exceed 100% because multiple selections were allowed.

Housing type	Share
Smaller / starter homes or cottages	66%
Single-family homes for purchase	60%
Apartments or multifamily rentals	54%
Affordable / subsidized housing	51%
Senior or assisted-living housing	33%
Condos or townhomes	27%
Transitional or emergency housing	27%
Accessory Dwelling Units (ADUs)	22%
Manufactured or mobile homes	12%

G. Lived Housing Experiences

Respondents were also asked whether they had personally experienced specific housing difficulties in the past three years. About half selected "none of the above," consistent with the homeowner-heavy respondent pool; among the rest, difficulty finding housing and inability to afford a home were the most common experiences, reinforcing the affordability and supply themes. Percentages are of the 494 respondents who answered

Experience in the past three years	Share
None of the above	52%
Difficulty finding housing in the area	33%
Could not afford to buy a home in the area	32%
Could not find housing that fit my needs	21%
Rent increased significantly / was priced out	21%
Had to move farther from work due to housing costs	6%

H. Respondents' Own Words

The survey drew 235 substantive open-ended comments. These comments deepen and, in places, extend the closed-ended results, most notably by naming the cost and process of building housing (permits, fees, and system development charges) as a barrier. The clusters below indicate how frequently each theme appeared in the written comments.

Open-ended comment theme	Frequency
Short-term / vacation rentals reducing supply	35 comments
Workforce, wages, and young families unable to stay	35 comments
ADUs, density, and "missing middle" housing	27 comments
Permitting, fees, and system development charges (SDCs)	23 comments
Seniors, aging, and fixed incomes	25 comments
Homelessness and the need for transitional housing	27 comments
Out-of-town, retiree, or cash buyers driving up prices	12 comments
Aging or poor-condition housing stock	7 comments

A representative selection of comments (lightly edited for length):

"I make 'good money' according to most people's estimations. I am still entirely unable to afford a home in this area. In six years, the rent of my one-bedroom apartment has gone from $1,200 to over $1,600, while my income has not risen accordingly."

"There is a need for affordable housing for seniors and young families looking to rent or own in the area. Low-income seniors and young working families are being priced out."
"Fixer-uppers run $500K+, additions cost $500 per square foot, and permits alone top $30K. Brookings housing is unworkable at every income level."

"Need to limit short-term rentals to free up the limited supply of homes."

"Stop penalizing homeowners who want to have ADUs by imposing excessive city fees."

"To build a vibrant community, one must consider housing for our young people and our workforce that matches their income."

I. Stakeholder Engagement Summary

Alongside the public survey, the project team convened a stakeholder group to provide focused, iterative input across the analysis. The group met three times during the study's technical phase, May 18, June 22, and July 13, 2026, in hybrid in-person and Zoom sessions, with a fourth meeting scheduled for August 17, 2026 to review the Draft HNA and Targeted Implementation Framework. The first meeting was a structured listening session; the second and third paired technical reviews (the Residential Buildable Lands Inventory and the capacity and density analysis) with stakeholder feedback. Because the group is small and meets in a working setting, its input is qualitative and deliberative rather than statistical.
Participants

The group brought together the perspectives most central to local housing supply:

- **Skip Watwood,** Century 21 Agate Realty (real estate and local market)
- **Mayor Phoebe Pereda,** City of Brookings
- **Clayton Malmberg,** Brookings City Council
- **Jeff Groom, CFO,** South Coast Lumber (major local employer)
- **Sr. Cora Rose,** St. Timothy Episcopal Church (faith community; homelessness and housing-access advocacy)

- **Hui Rodomsky,** Oregon Department of Land Conservation and Development (state planning)
- **Diana Carter,** CORE Response (homelessness services)

WHAT STAKEHOLDERS PRIORITIZED

Workforce housing as the central concern. The group repeatedly framed workforce and entry-level housing as the core issue. A major-employer representative described difficulty recruiting and retaining millwrights, electricians, and office staff for want of housing, with roughly a third of that workforce commuting from Crescent City; the Mayor and others noted that police officers and teachers cannot afford to buy locally. Stakeholders described an oversupply of homes above roughly $625,000 against an undersupply of attainable workforce housing.
Attainable ownership and the 'missing middle.' There was clear appetite for smaller, basic starter homes with small yards (explicitly preferred over duplexes), cottage homes, and townhomes, enabled by smaller lot sizes (3,000–4,000 sq ft), increased R-1 density, and planned unit developments.

Policy and code levers. Distinct from the survey, stakeholders focused heavily on tools: system development charge (SDC) deferral and the City's workforce-housing SDC waiver, smaller-lot and density code changes, PUDs, a Gold Beach-style streamlined residential zone, and a standing review of whether current policy is potentially a barrier to development. The recurring goal for the group is the development of the Targeted Implementation Framework, the high-impact strategies the City can act on.

Land supply, buildable land, and jurisdiction. Stakeholders engaged the buildable-lands findings directly: limited developable land, most of it in county RR-5/RR-10 that will not develop at density without annexation; a city medium-density land deficiency offset only by counting the unincorporated UGB; and Lone Ranch as the largest single tract. They encouraged prioritizing infill on land already inside the city before pursuing a UGB amendment or annexation.
Harbor annexation. DLCD favored bringing Harbor into the city through the HNA, while local stakeholders viewed near-term annexation as unrealistic, citing infrastructure and sewer costs, a 15-to-20-year horizon, and community disinterest, but kept longer-term options (agriculture lands south of Harbor, SB 1537 land exchange) open for later study.

Infill on existing buildings. Stakeholders saw untapped capacity in ADUs (allowed but underused, with a call for informative pamphlets) and in residential above commercial in the C-3/C-4 zones, noting business owners who were unaware they could add upper-floor housing for workers.

Infrastructure as a hard constraint. Water and sewer capacity, especially in Harbor, was treated as a real cap on where housing can go; the study's infrastructure-grant origins were seen as positioning the City to fund growth-enabling improvements.

PARALLELS AND DIFFERENCES BETWEEN THE STAKEHOLDER AND PUBLIC GROUPS

The two participant types converge strongly on the core diagnosis and diverge on a few telling points. Both independently identified affordability relative to local incomes as the central problem; both called for smaller starter homes and missing-middle types (cottages, townhomes, small-lot single-family, ADUs, and housing above commercial space); and both described local single-family stock being absorbed by retirees and higher-income buyers while workers and young families are priced out. The table below maps the main themes across the two groups.

Theme	Public survey	Stakeholder group	Convergence
Affordability vs. local incomes	Top concern (83%)	Central framing	Strong
Workforce/entry-level housing	37%; 'can't stay' (35 comments)	Leading theme	Strong
Smaller/starter & missing middle	Most-wanted type (66%)	Small lots, cottages, townhomes	Strong
ADUs & housing above commercial	ADUs 22%; fee complaints	Underused; C-zone upper floors	Aligned
Buyers pricing out locals	Raised in comments	Retiree/higher-income buyers	Aligned
Development cost (permits, fees, SDCs)	Barrier/grievance (23 comments)	Lever to tune (SDC waiver)	Same issue, opposite framing
Rental supply & rent increases	68% (80% of renters)	Acknowledged; ownership-leaning	Partial
Short-term rentals	Top-three driver (521%)	Less emphasized in discussion	Different emphasis
Homelessness/ transitional housing	41%; recurring	Less emphasized in discussion	Different emphasis
Land supply, RBLI, annexation, UGB	Out of scope for public	Major focus	Stakeholder-only
Senior housing/aging in place	Senior/older-adult options a gap (36%); senior housing wanted (33%)	Raised indirectly (downsizing barriers)	Partial

The clearest difference is short-term rentals: named by half of survey respondents (and 62% of renters) as a driver of lost long-term supply, with many explicit calls to limit them. The two groups also frame development cost from opposite ends with the public identifying it as a barrier ('permits alone top $30K'), and stakeholders identifying a lever to tune (the workforce-housing SDC waiver and SDC deferral). These statements viewed together make development cost one of the best-supported themes across both groups. Finally, the stakeholder group engaged the supply-side and regulatory machinery (buildable-land supply, zoning and lot-size reform, annexation, the UGB, and infrastructure) that the survey by design did not, while the survey captured lived-experience detail at a scale the small group could not. The two are complementary inputs.

J. Community-Identified Priorities Informing the Targeted Implementation Framework

The following priorities emerged from the survey with sufficient strength across both the closed-ended results and the open-ended comments to warrant consideration in the HNA's Targeted Implementation Framework. The stakeholder group (Section I) independently reinforced most of them, especially workforce and missing-middle housing, attainable ownership, ADUs and upper-story housing, and development-cost levers, while the survey carries the stronger signal where the two diverge, notably on short-term rentals and housing for people experiencing homelessness. Each priority below is a summary of community input, not a recommendation. The Framework chapter will determine which of these translate into specific policy changes and how; the illustrative policy directions noted here are offered only to show the kind of measure each priority points toward and will be evaluated against the HNA's technical findings, legal requirements, and City capacity.

1. **Affordability relative to local incomes**
   Community input: The single strongest theme in the survey. Cost relative to local incomes was mentioned by 83% of respondents overall and 94% of renters, and was included in the open-ended comments, including from higher earners who still cannot afford to buy.
   Illustrative policy directions to evaluate: Tools that expand income-aligned housing and reduce the gap between local wages and housing costs. For example, affordability-oriented land use and financing measures considered in the sections below.

2. **Rental supply and multifamily housing**
   Community input: Two-thirds of respondents (68%) named a shortage of rental housing, rising to 80% among renters. Apartments and multifamily rentals were among the most-requested housing types (54%). Comments described extreme scarcity, including a single rental drawing dozens of applicants within days.
   Illustrative policy directions to evaluate: Measures that enable and encourage rental and multifamily production including zoning capacity, allowed densities and housing types, and removal of barriers to multifamily development.

3. **Short-term rentals and long-term housing supply**
   Community input: A distinctly community-driven priority. Half of respondents (52%, and 62% of renters) flagged short-term rentals as reducing long-term availability, and it is tied with the workforce/wages theme as the most frequent open-ended theme (35 comments each), with repeated, explicit calls to limit short-term rentals.
   Illustrative policy directions to evaluate: Short-term rental policy. For example, registration, caps, or zoning-based limits as a lever specifically raised by the public to protect long-term housing stock.

4. **Missing-middle and starter homes, including ADUs**
   Community input: The clearest direction on housing type: smaller and starter homes led all responses (66%), and ADUs, condos/townhomes, and duplex-scale housing drew steady support (ADUs 22%). Comments repeatedly cited zoning limits and excessive ADU fees as obstacles to this type of housing.
   Illustrative policy directions to evaluate: Code and standards changes that make missing-middle housing and ADUs easier and cheaper to build. For example, allowed uses, lot and dimensional standards, and ADU-specific fee relief.

5. **Cost and process of building housing (permits, fees, and SDCs)**
   Community input: Although not offered as a fixed answer choice in the survey, the cost and complexity of permitting, fees, and system development charges was one of the most-raised open-ended themes (23 comments).
   Illustrative policy directions to evaluate: Development-process and cost measures. For example, fee or SDC reductions, deferrals, or waivers for targeted housing types, and permit streamlining.

6. **Workforce housing and keeping young families**
   Community input: Workforce housing was named as a challenge by 36% of respondents, and 'can't stay/priced out' is tied with short-term rentals as the largest open-ended themes (35 comments each), naming teachers, nurses, first responders, and young families as those being lost.
   Illustrative policy directions to evaluate: Housing tied to local employment and attainable to working households. For example, workforce-targeted housing programs and incentives, and housing types matched to local wages.

7. **Senior and fixed-income housing**
   Community input: Consistent with the area's older demographics, 36% named a shortage of senior housing options, senior/assisted-living housing was a top-requested type (33%), and 25 comments spoke to aging in place on fixed incomes.
   Illustrative policy directions to evaluate: Housing options that serve seniors and fixed-income households. For example, senior and assisted-living housing, aging-in-place-friendly standards, and accessible smaller-unit types.

8. **Housing for people experiencing homelessness / transitional housing**
   Community input: A lack of housing for people experiencing homelessness was named by 41% of respondents; transitional or emergency housing was requested by 27%; and 27 comments addressed homelessness directly.
   Illustrative policy directions to evaluate: Transitional, emergency, and supportive housing pathways, coordinated with service providers and regional partners.

These priorities point toward a small number of high-leverage focus areas; attainable ownership and rental supply, the missing middle and ADUs, the cost and process of building, short-term rental impacts, and housing for specific populations (workforce, seniors, and people experiencing homelessness). Narrowing them to policy changes of the Targeted Implementation Framework is the work of that chapter; this appendix establishes the community mandate on which those choices are informed.

K. Methodology and Data Notes

- Stakeholder engagement: the Section I summary draws on the notes from Stakeholder Meetings #1–#3 (May 18, June 22, and July 13, 2026); statements are paraphrased from those notes. A fourth meeting (August 17, 2026) on the Draft HNA and Targeted Implementation Framework will be added to the final record.
- Instrument and platform: a community housing survey built in ArcGIS Survey123, hosted on an ArcGIS Hub project site, open to any respondent via link, short URL, or QR code.
- Dataset: 514 responses, collected June 8-September 7, 2026.
- Multi-select questions: the challenge, housing-type, and experience questions allowed multiple selections, so shares sum to more than 100%. Reported percentages use the number of respondents who answered that specific question as the denominator (noted in each section), not the full 514.
- Not statistically representative: results reflect self-selected participants reached through public channels and skew toward homeowners and older residents. They are intended to complement, not replace, the quantitative analysis in the HNA.
- Open-ended comments: 235 substantive comments were reviewed and grouped into recurring themes; theme counts reflect the number of comments touching each theme and are approximate, as a single comment may include more

Brookings Housing Needs Analysis
Appendix C
COMMUNITY OUTREACH MATERIALS

1. Housing Needs Analysis Info Sheet (English) 81
2. Housing Needs Analysis Info Sheet (Spanish) 82
3. Survey Flier (English) 83
4. Survey Flier (Spanish) 84



Brookings Housing Needs Analysis

What is a Housing Needs or Capacity Analysis?

Oregon's statewide planning system requires that local jurisdictions ensure an adequate supply of land for residential and employment development. For housing, statewide planning Goal 10 charges localities with the responsibility to "provide for the housing needs of citizens of the state" and to create plans that "shall encourage the availability of adequate numbers of needed housing units at price ranges and rent level which are commensurate with the financial capabilities of Oregon households and allow for flexibility of housing location, type and density."[1]

A Housing Needs Analysis provides the technical foundation for communities to develop policy required to pursue these objectives.

Why do it now?

Brookings is not unlike other cities throughout Oregon that are facing housing shortages and challenges with affordability. A comprehensive study of local housing production and the need for residential land will enable Brookings to implement policy and take other actions to address these issues, encouraging housing production that meets the needs of current and future residents.

How will it be used?

A Housing Needs Analysis can benefit Brookings in several different ways:

- The Housing Needs Analysis will provide a factual basis for making sound, defensible land use decisions like rezonings, annexations, and land divisions that are the first step in housing production. Providing greater regulatory certainty to housing developers makes it easier for them to build needed housing and, in doing so, can make Brookings a more attractive place for housing developers to do business.
- The Housing Needs Analysis will include policy recommendations that the City can implement to improve the development conditions by reducing local regulatory barriers to housing production and identifying opportunities to incentivize production of housing that may not otherwise be produced by the local market.
- The Housing Needs Analysis will support Brookings' efforts to obtain additional resources (like the grant that funded the HNA itself) and to advocate for legislation supportive of its local housing goals. Examples include grants that pay for public infrastructure necessary for housing development.

[1] OAR 660-015-0000(10) Goal 10 Housing

Análisis de Necesidades de Vivienda en Brookings

¿Qué es un análisis de necesidades de vivienda o análisis de capacidad?

El sistema de planificación estatal de Oregón requiere que las jurisdicciones locales aseguren un suministro adecuado de tierras para el desarrollo de zonas residenciales y comerciales. Para la vivienda, el Objetivo 10 (Goal 10) otorga a las localidades la responsabilidad estatal de "proveer para las necesidades de vivienda de los ciudadanos del estado". Asimismo, exige crear planes que "alienten la disponibilidad de un número adecuado de unidades de vivienda en rangos de precios y niveles de renta que sean proporcionales a las capacidades financieras de las familias de Oregón, y que permitan la flexibilidad de alojamiento por ubicación, tipo y densidad".

Un Análisis de Necesidades de Vivienda nos brinda la base técnica para que las comunidades desarrollen las normativas requeridas para alcanzar estos objetivos

¿Por qué hacerlo ahora?

Brookings no es ajena a la situación del resto de las ciudades de Oregón, las cuales enfrentan una escasez de vivienda y problemas de asequibilidad. Un estudio integral de la producción local de vivienda y de la necesidad de suelo residencial permitirá que Brookings implemente lineamientos y otras acciones para abordar estos problemas, alentando la producción de viviendas que satisfagan las necesidades de los residentes actuales y futuros.

¿Cómo se usará?

Un Análisis de Necesidades de Vivienda puede beneficiar a Brookings de muchas maneras:

- Proveerá fundamentos factuales para tomar decisiones de uso de suelo acertadas y defendibles, tales como rezonificaciones, anexiones y subdivisiones de tierra, que son el primer paso para la producción de vivienda. Esto dará mayor certidumbre normativa a los promotores inmobiliarios y les facilitará la construcción de las viviendas necesarias. Al hacerlo, Brookings se convertirá en un lugar más atractivo para que los promotores inviertan.
- Incluirá recomendaciones de políticas que la ciudad puede implementar para mejorar las condiciones de desarrollo. Esto se logrará al reducir las barreras regulatorias en la producción de vivienda e identificar oportunidades para incentivar la construcción de unidades que, de otro modo, el mercado local no generaría.
- Apoyará los esfuerzos de Brookings para obtener recursos adicionales (como la subvención que financió este mismo HNA*) y para abogar por legislaciones que respalden las metas locales de vivienda. Algunos ejemplos incluyen fondos para financiar la infraestructura necesaria para el desarrollo habitacional.

*Housing Needs Analysis (HNA, por sus silabas en inglés)





TAKE THE SURVEY:
arcg.is/1jTquG2



LEARN MORE:
hna brookingsor.hub.arcgis.com

Help Shape the Future of Housing in Brookings

The City of Brookings is studying what kind of housing our community needs now and over the next 20 years. We want to hear from you!

WHAT IS THIS?

The City is conducting a Housing Needs Analysis (HNA) which is a study of who lives in Brookings, who's expected to live here in the future, and whether we have the right land and housing to meet that need.

WHY DOES MY INPUT MATTER?

Data alone doesn't tell the whole story. You know what it's actually like to find, afford, and keep housing here. Your answers help shape the findings and the City's options going forward.

HOW LONG DOES IT TAKE?

About 5 minutes.

IS IT ANONYMOUS?

Yes. The survey is completely anonymous.

WHO CAN TAKE IT?

Anyone connected to the Brookings area, whether you live within city limits, in Harbor, elsewhere in Curry County, or work here.

WHAT HAPPENS TO MY ANSWERS?

They'll inform the Housing Needs Analysis. All results will be shared with the City and are included in project documents.

A project of the City of Brookings
Prepared by Green Top PDR

greentop
planning development research





TOMA LA ENCUESTA:
arcg.is/1jTquG2



APRENDE MAS:
hna brookingsor.hub.arcgis.com

Ayuda a moldear el futuro de Viviendas en Brookings

La Ciudad de Brookings está estudiando que tipo de vivienda nuestra comunidad necesita en la actualidad y por los siguientes 20 años.

¿Qué es esto?

La Ciudad está orquestando un Housing Needs Analysis *, esto es un estudio de quien vive en Brooking, quien se espera que viva ahí en el futuro, y si se tiene el terreno y vivienda correcta para satisfacer la necesidad.

¿Por qué mi opinión importa?

La información por sí sola no nos cuenta la historia completa. Usted sabe lo que implica encontrar, costear, y mantener una residencia aquí. Sus respuestas ayudan a moldear los hallazgos tanto como las opciones de la ciudad para proseguir.

¿Cuánto dura?

Alrededor de 5 minutos

¿Es anónimo?

Sí. La encuesta es completamente anónima.

¿Quién lo puede hacer?

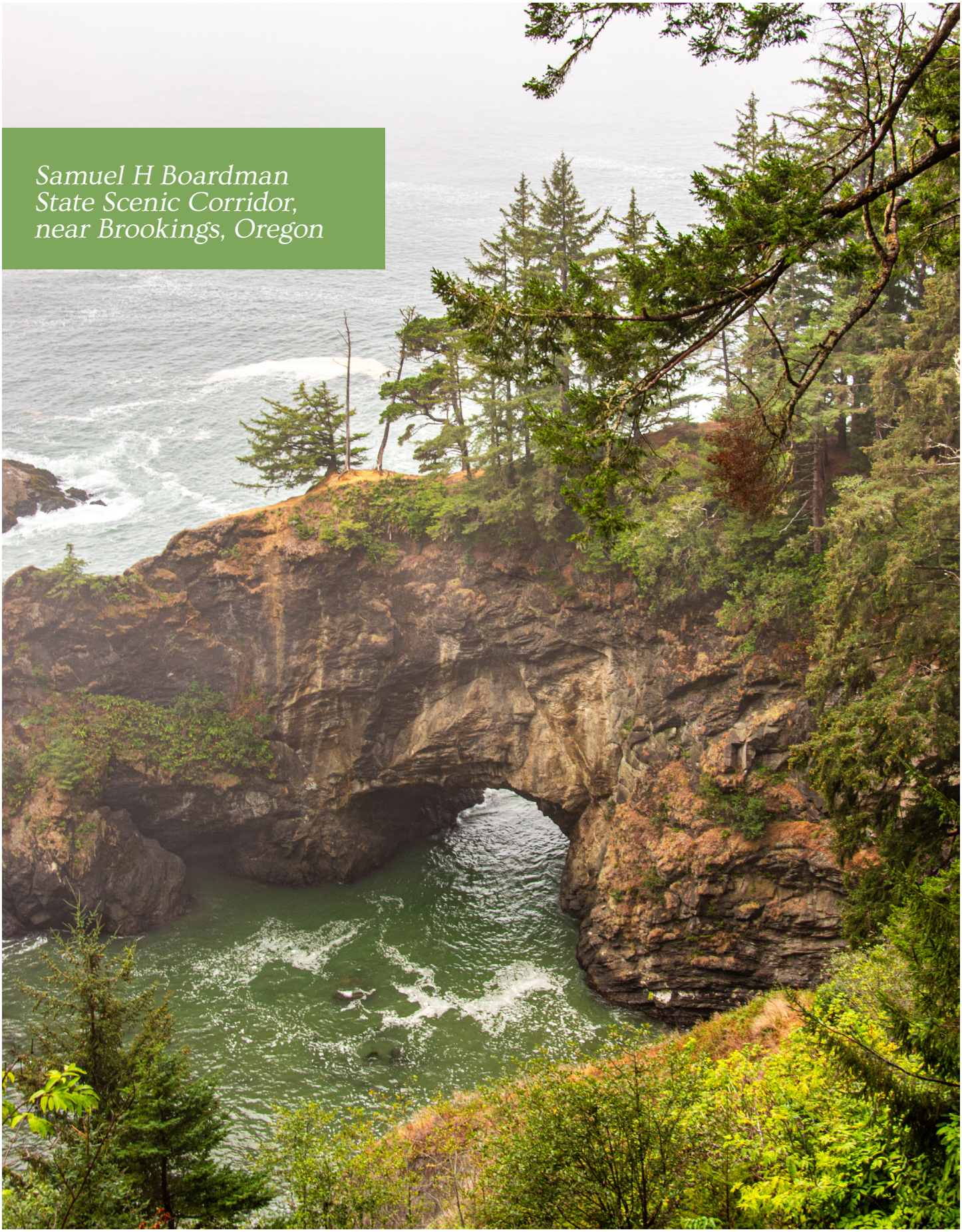
Cualquiera que esté conectado en el área de Brookings, ya sea que vives en los límites de la ciudad, en el puerto, en algún lugar de Curry County, o trabajas aquí.

¿Qué pasa con mis respuestas?

Estas informaran a Housing Needs Analysis. Todos los resultados serán compartidos con la Ciudad y estarán incluidos en los documentos del proyecto.

**Análisis de Necesidades de Vivienda (HNA, por sus silabas en inglés.)*
Un proyecto de la Ciudad de Brookings
Preparado por Green Top PDR

greentop
planning development research



Samuel H Boardman State Scenic Corridor, near Brookings, Oregon



Prepared by Green Top PDR - Planning, Development, Research
4495 South Pacific Highway, Phoenix, Oregon, 97535

Planning Commission and City Council Report

Land Development Code Amendment

Type IV Legislative Land Use Decision

File Number:

To: Planning Commission and City Council

From: Matt Brinkley, AICP, Green Top Planning

Date: September 25, 2026 for October 6, 2026 and October 12 public hearings

Proposal

Amend a part of the City of Brookings Comprehensive Plan (the Plan) related to Goal 10 by updating the Plan and adopting by reference the 2026 – 2046 Housing Needs Analysis and Residential Buildable Lands Inventory.

Summary

Oregon's statewide planning system requires that local jurisdictions ensure an adequate supply of land for residential and employment development. For housing, statewide planning Goal 10 charges localities with the responsibility to "provide for the housing needs of citizens of the state" and to create plans that "shall encourage the availability of adequate numbers of needed housing units at price ranges and rent levels which are commensurate with the financial capabilities of Oregon households and allow for flexibility of housing location, type and density."[1]

A Housing Needs Analysis (also known as a Housing Capacity Analysis) provides the technical foundation for communities to develop policy that addresses this responsibility. The City of Brookings has not previously adopted a Goal 10 compliant Housing Needs Analysis or Residential Buildable Lands Inventory.

Brookings is not unlike other cities throughout Oregon that face housing shortages and challenges with affordability. A comprehensive study of local housing production and the need for residential land will enable Brookings to implement policy and take other actions that address these issues, encouraging housing production that meets the needs of current and future residents.

[1] OAR 660-015-0000(10) Goal 10 Housing

The HNA is divided into four chapters, reflecting its central objectives:

- Chapter 1: Community Profile explores the demographic and other socioeconomic factors that will influence the need for housing over the next 20 years.
- Chapter 2: Residential Buildable Lands Inventory assesses the current state of residential lands in the Brookings UGB, determining the development status of every residential property, and measuring the amount of land that remains available for future residential development.
- Chapter 3: Residential Lands Capacity Analysis analyzes the ability of available residential land to accommodate the current and projected need for housing.
- Chapter 4: Conclusions and Implementation provides 8 policy and programmatic responses to challenges achieving production and other housing goals identified in previous chapters.

Authority

Amending the Comprehensive Plan is a Legislative procedure whereby, pursuant to Brookings Municipal Code (BMC) Chapter 17.140 *Legislative Text Amendments and Quasi-Judicial Comprehensive Plan Map and/or Zone Changes*, the Planning Commission reviews proposed legislative decisions and makes a recommendation to City Council. The Council takes final action by enacting an ordinance.[2]

Compliance with Standards of Review, Findings of Fact, and Conclusions of Law

The BMC does not provide criteria for reviewing Legislative decisions, but the Comprehensive Plan itself does state that "amendments to this Plan [...] will be consistent with applicable State Planning Goals."[3] Not all statewide planning goals are relevant to this proposal. In the interests of clarity and economy, only relevant goals will be addressed in the findings of fact and conclusions of law below.

Text reproduced and/or excerpted from regulatory documents that are reproduced verbatim appear in *italicized Times New Roman* font; the City of Brookings' findings of fact and conclusions of law appear in plain Aptos font.

[2] §17.140.020.A, §17.140.070.A

[3] Brookings Comprehensive Plan, Goal 2 Land Use Planning, Policies, 4

Goal 1: Citizen Involvement

Findings of Fact

Goal 1 requires that "Citizens shall have the opportunity to be involved in the phases of the planning process as set forth and defined in the goals and guidelines for Land Use Planning, including Preparation of Plans and Implementation Measures, Plan Content, Plan Adoption, Minor Changes and Major Revisions in the Plan, and Implementation Measures." The City of Brookings and consultants assisting it with this project provided numerous opportunities throughout the process for citizens to participate. These efforts include the following:

- Convening a Stakeholder Advisory Group, which conducted four meetings with the consultant to review and comment on a series of technical memoranda that formed the body of the final HNA;
- Project website (ArcGIS Hub): a public-facing site with project information, documents, and a direct link to the survey;
- ArcGIS Survey123 online survey: the primary survey tool, distributed by direct link, short URL, and QR code. The survey amassed a total of 514 respondents, representing a broad cross section of UGB residents;
- Project one-pager: a printed and digital one-page summary of the HNA was created in both English and Spanish, and distributed at public outreach events and at public locations, including Brookings city hall and public library, to explain the project and direct residents to the survey;
- Facebook and social media: the project and survey were promoted through the City of Brookings Facebook page. The project launched with a Facebook promotion on June 9, 2026, and the City published a Facebook post on the morning of July 13, 2026 to reinforce the KURY segment's on-air call to action. The City also provided support through its social media channels and resident newsflash emails;
- Utility-billing email: the survey link was included in two City utility-billing communications, reaching a broad base of local households. A first distribution occurred in June 2026 and a second in August 2026;
- KURY radio: an on-air segment about the HNA encouraged residents to take the survey; the project team principles were interviewed by station staff on a segment aired the morning of July 13, 2026
- In-person community outreach: the project team engaged residents at two Music in the Park events at Azalea Park, held June 21 and July 12, 2026
- Joint Planning Commission/City Council study session held on August 31, 2026;
- Planning Commission public hearing held on October 6, 2026;
- City Council public hearing held on October 12, 2026.

Conclusions of Law

The Planning Commission and City Council can find that significant efforts were taken during the production of the Brookings Housing Needs Analysis to involve the members of the

public and enable them to participate meaningfully. The proposal, therefore, can be found to satisfy the requirements of Statewide Planning Goal 1.

Goal 2: Land Use Planning

Goal 2 directs local jurisdictions to "establish a land use planning process and policy framework as a basis for all decision and actions related use of land [...]".[4]

Findings of Fact
Although the Housing Needs Analysis is not itself a "land use planning process", it does provide a factual basis for land use decisions affecting land planned and/or zoned for residential use.

Conclusions of Law
The Planning Commission and City Council can conclude that the Housing Needs Analysis has been prepared in accordance with applicable administrative rules and state statutes that implement Goal 2.

Goal 10: Housing

Goal 10 directs local jurisdictions to "provide for the housing needs of citizens of the state."[5] To do so, local units of government must inventory buildable lands for residential use and develop comprehensive plan housing elements that examine, at minimum, "an inventory of buildable land and determination of housing capacity [...] An analysis of residential land need based on the needed housing types and allocated housing need [...] and a comparison of residential land need and housing capacity."[6]

ORS 197A.280 further details how cities under 25,000 population determine housing and accommodation of needed housing. A city must "determine its needed housing" according to ORS 197A.018:

> *ORS 197A.018(4) In determining needed housing the city must demonstrate that the projected housing types, characteristics and locations are:*
>
> *(a) Attainable for the allocated housing need by income, including consideration of publicly supported housing;*
>
> *(b) Appropriately responsive to current and projected market trends; and*

[4] OAR 660-015-0000(2)
[5] OAR 660-015-0000(10)
[6] OAR 660-008-0100

(c) Responsive to the factors in ORS 197A.100 (Housing production strategy) (2)(b) to (d).

Findings of Fact

Chapter 1 of the HNA, pages 6 – 20, examines socioeconomic factors that will influence demand for housing in the Brookings UGB including

- Historical population trends;
- Projected population growth;
- The OHNA housing production target;
- Household income distribution;
- Age;
- Household size;
- Race and ethnicity;
- Housing affordability;
- Homelessness; and
- Disability status.

Brookings has experienced strong population growth over the past 30 years, adding 2,348 new residents by 2020. Brookings has grown faster, and more steadily than many other communities on the southern Oregon coast. More recently, however, population growth has slowed. Brookings' future growth is forecasted to be slower than its historical growth. By 2046 (the end of the 20-year planning period), the total population within Brookings Urban Growth Boundary (UGB) will have reached 12,861, having added a total of 932 new residents since 2026—a nearly 8% increase over 20 years. Growth is forecasted to be fastest at the beginning of this period, slowing considerably thereafter. The Oregon Housing Needs Analysis (OHNA) set a 20-year housing production target of 1,915 homes within the Brookings UGB, or 118 units/year during the first decade of the target period. The largest number of units are needed to meet demand for households earning 0-30% of Area Median Income and households earning over 120% of AMI (27% and 26% of the total 1-year production target, respectively).

At $446,700 according to the 2020-2024 5-Year ACS Estimate, Brookings has the highest home value within its immediate area. According to actual home sales data, by the end of 2025 the average monthly median sale price for a home in Brookings was $516,146. Renters in Brookings pay a Median Gross Rent of $1,415, the most among regional peer communities and nearly as much as the statewide average. It is important to frame this statistic within the realities of the local housing market: while half of renter households spend less than this, half spend more. Given this, it is unsurprising that housing cost burden is significant in and

around Brookings. The percentage of homeowner households in Brookings that pay more than 30% of their pretax income toward housing is nearly 27%--higher than the statewide average of 25%. Nearly 40% of renter households in Brookings are cost burdened, and cost burden is much more pronounced in Harbor where nearly 55% of renter households are cost burdened.

According to *2025 Oregon Statewide Homelessness Estimates* produced by the Oregon Department of Housing and Community Services (OHCS), Curry County had a "County Homeless Rate" of 8.6/1,000 residents, slightly higher than Coos County at nearly 7/1,000.

Even with a median age that is 10 years older than the statewide median, Brookings has the highest percentage of school aged children of any of its neighbors (nearly 18% of Brookings' population is under 18), including Crescent City. In terms of housing, this suggests that there will be demand for single unit, detached housing with substantial private outdoor space for some time to come.

Relatively higher percentages of Brookings and Harbor residents report living with a disability. This is consistent with the age profile for both communities, which is older than average, and something that can be addressed through local housing policy.

These and other socioeconomic factors influenced, particularly the OHNA housing production target, informed the proposed housing mix described in Chapter 3. Residential Lands Capacity Analysis. Chapter 3 also examines housing tenure; current housing type mix; the current inventory of regulated affordable housing; vacancy; housing age; residential density, and recent residential development trends.

Housing development in the Brookings UGB has fluctuated over the years. Consistent with historical population trends, residential development in Brookings was highest in the period from 1990-1999 when, according to ACS data, nearly 950 dwelling units were constructed (almost 30% of its existing housing). Harbor, likewise, has newer housing stock, experiencing significant development in the first decade of this century when 266 units were constructed (nearly 18% of its existing housing) over that 10 year period.

Average densities (the number of units/acre of residential zoned land) tend to be much lower than the maximum densities allowed within each zone. R-1-6, for example is the most prevalent residential zone in the City of Brookings, with 1,561 dwelling units on 504 acres. Although this zone allows the densest single unit detached development in Brookings, it has been developed at densities far below the maximum: 3.1 dwelling units/net acre.

Historical residential development patterns, which have tended toward lower density residential development, will need to shift in order to accommodate the community's changing needs. These needs are driven by demographic trends and the need for housing

that is affordable to lower and moderate income households. Development of more middle and higher density housing will be needed to match projected demand over the next 20 years. Although historical residential development patterns have tended toward the lower end of permitted densities, recent residential development has shifted toward higher permitted densities. This suggests emerging market alignment with the need for more medium and higher density housing options.

The City of Brookings has a vacancy rate of around 9%, about 300 dwelling units, which is relatively high. Although higher vacancy rates can indicate softer demand for owner and renter occupied housing, that is probably not the case here. In Brookings, the reason for higher vacancy is likely to be the result of second homes, that are seasonally or "recreationally" occupied, and short terms rentals. Data suggests that vacancy may disproportionately impact the inventory of housing types which might otherwise provide affordable market rate ownership and rental opportunities for middle income households.

Conclusions of Law

The Planning Commission and City Council can conclude that the Housing Needs Analysis has been prepared in accordance with ORS 197A.280(3), 197A.018(4), OAR 660-008-0100 and other applicable administrative rules and state statutes establishing the requirements for determining housing need in a city with a population of less than 10,000.

> *OAR 660-008-0100(2)* [A] *buildable lands inventory must document the amount of buildable land in each plan designation that allows residential use under clear and objective standards* [...]. *Sufficient buildable land shall be designated on the comprehensive plan map or in the zoning map to accommodate needed housing by type and density range in accordance with the allocated housing need.*

Authority and standards for Residential Buildable Land Inventories can be found in elsewhere in state statute and administrative rule. ORS 197A.280(3)(b) requires cities with a population of less than 10,000 to "Inventory the supply of buildable land available within the urban growth boundary to accommodate needed housing [...]." OAR 660-024-0050(1) further clarifies that local governments must create an inventory to "determine whether there is adequate development capacity to accommodate 20-year needs [...]".

Findings of Fact

Brookings and Curry County land development regulations were examined to determine in which zones housing could be developed with clear and objective standards.[7] The results of this analysis are discussed in the "Residential Land Base" section of Chapter 2 on pages 22 – 24. Based on estimated density calculations, each zone was then placed into Low, Medium or High density categories depending on where they fell within the following ranges[8]:

- Low Density, eight (8) or fewer units/acre
- Medium Density, nine (9) to 16 units/acre
- High Density, more than 16 units/acre.

The RBLI documented 4,870 individual properties in the UGB (City of Brookings and unincorporated Curry County including Harbor) that are zoned for residential uses or currently have a residential use despite not being zoned or planned for a residential use. These residential properties cover 4,342 acres.

Residential lands that are subject to natural hazards, natural resource protections, steep slopes, the "100-year flood plain or floodway", or "cannot be provided with public facilities.[9] were removed from the inventory. This analysis can be found in "Development Constraints" section of Chapter 2 on pages 22 – 37. Altogether, 2,459 acres of residential land were found to be constrained by environmental conditions such as steep slopes or the presence of wetlands and riparian areas. Steep slopes and related environmental conditions (lands susceptible to landslides, for example) represented the most prevalent and impactful environmental constraint. Slopes 25% and steeper, for example, affected 1,621 acres of residential land in the UGB.

Subsequent to the development constraints analysis, the development status of all residential lands were determined, each residential property in the UGB being placed into one of 5 development categories:

- Developed. Consistent with OAR 660-008-01000(5)(b), residential properties smaller than 0.50 acres that have an existing dwelling are considered "fully developed". In addition, residential properties with existing dwellings 0.50 acres and larger may be classified as developed when the property is encumbered by "ancillary" development (driveways and other pavements, accessory structures, swimming pools and sports courts). The inventory documented 4,022 developed residential properties in the UGB, covering 2,550 acres. As "developed" residential lands, it was determined that they did not have any remaining capacity for further development by land divisions or

---

[7] As of the production of the Brookings Housing Needs Analysis, there was no reliable source for Curry County comprehensive plan map data. Therefore, residential zones were used analytical purposes for both City of Brookings and unincorporated Curry County parts of the Urban Growth Boundary.

[8] Density ranges are consistent with OAR 660-038-0060(1)(b)(B)

[9] OAR 660-008-0005(7)(a) –(e)

development of additional units on the same lot.[10] Residential properties in this category represent more than 83% of residential properties in the UGB and nearly 59% of the total area occupied by residential land within the UGB.

- Vacant. These are residential properties with no structures or structures with very little value. For example, an acre of undeveloped residential zoned land with a small shed would be considered "vacant", able to be further developed.

  In terms of both the number of properties and their overall acreage, the number of vacant lots in UGB is small relative to the number of and areal extent of developed residential lands: 469 tax lots, covering 1,312 acres (30% of all residential lands within the UGB) were found to be vacant.

  Of this, only 488.5 acres were found to be free from the environmental constraints discussed above and suitable for development. Residential properties in this category represent just under 10% of residential properties in the UGB and just over 11% of the total area zoned or used as residential land within the UGB. Vacant designated land also constitutes nearly 70% of the 704 developable residential acres available in the UGB.

- Partially Vacant. These are residential properties "with existing development [...] where the remaining, unconstrained land area can be further developed within the applicable development regulations."[11]

  OAR 660-008-0100(5)(a) allows cities with a population of no more than 25,000 (like Brookings) to apply a safe harbor when calculating the amount of additional development that may occur on a residential property with an existing dwelling that is larger than 0.50 acres. This RBLI applies this method, removing 0.25 acres for the existing dwelling and designating the remaining unconstrained land as developable. Land is considered to be unconstrained when it is free from environmental and other constraints discussed above. For example, a one-acre residential property with an existing home is assumed to have 0.75 acres available for further development (1 acre – 0.25 acres for the existing home = 0.75 acres). If, however, 0.25 acres are located within a riparian setback, only 0.50 acres are considered to be available and suitable for further development (sometimes known as "infill" development), because 0.25 acres are "constrained".

  Across the entire UGB, 214 tax lots covering 358 acres were determined to be partially vacant. Residential properties in this category represent a little over 4% of residential properties in the UGB (Figure 10) and a little over 8% of the total area designated as residential land within the UGB (Figure 11).

  The vacant portion of these partially vacant properties that is free from development constraints and available for development covers nearly 213 acres or just under 5% of developable residential lands within the UGB.

- Undevelopable/Unbuildable. These are lands that may be zoned to allow residential development, but are not "available" or "suitable" for residential development because

[10] This does not include accessory dwelling units (ADUs).

[11] OAR 660-008-01000(38)

they are publicly owned or in public use, or are otherwise constrained by site characteristics or regulatory restrictions that prevent development.

In addition to analysis of the RBLI database, the consultant also "coordinated with public entities on any publicly owned land" to determine if any might be available for residential development.

In the UGB, 160 properties, covering roughly 99 acres, were determined to be unbuildable for the reasons described above. None of this land is considered to be developable. Properties in this category represent nearly 3.3% of all residential properties in the UGB and just over 2% of the residential land area within the UGB.

- Redevelopable. Redevelopable properties are those that can reasonably be expected to transition to residential use or to a more intensive residential use over the planning period. Determining this status is highly dependent on local knowledge of the unique characteristics affecting individual properties. Only one commercial 2.6 acre property was placed in this category. Separate from the inventory, the potential to redevelop commercial properties is evaluated further in the subsequent capacity analysis.

The sufficiency of these lands to accommodate projected need for residential development over the planning period is discussed in the "Residential Land Capacity & Sufficiency" section of Chapter 3 on pages 55 – 56. The HNA determined that there is sufficient developable residential land available throughout the UGB to meet forecasted housing demand over the next 20 years, and the intervening 7, 10, and 14 year intervals. Much of this capacity is, however, provided by housing planned for the Lone Ranch MPD, which provides enough capacity to meet the 20-year need for low and high density residential development within the incorporated portion of the UGB.

Even with this planned capacity provided in the Lone Ranch MPD, there is a need for medium density residential land elsewhere, which can be met across the remainder of the unincorporated UGB. However, only a little over 25 acres of medium density residential land is available for development within the City of Brookings, leaving 84 acres of needed medium density residential land in the unincorporated UGB. This presents practical challenges as medium density development may be less likely to occur in the unincorporated UGB where there is less access to public infrastructure capable of supporting development at those densities.

Pursuant to OAR 660-008-0100(7), an historical average capacity for each zone was calculated but adjusted based on average densities calculated for residential development entitled over the past 10 years. This approach better accounted for regulatory and market changes that more closely capture residential densities that can reasonably be expected during the planning period.

OAR 660-008-0100(3) When preparing the buildable lands inventory, the local government must coordinate with public entities on any publicly owned land they own to determine if the land may be suitable and available for the development of needed housing. Public entities include school districts, colleges, universities, and transit districts.

Findings of Fact

Public entities were contacted by letter, informed of the project, and provided with opportunities to comment. None of those contacted identified publicly owned land suitable for the development of needed housing.

Conclusions of Law

The Planning Commission and City Council can conclude that the 2026-2046 Brookings Housing Needs Analysis complies with the requirements set forth in

Recommendation

Staff recommend that the Planning Commission recommend that City Council amend the section of the City of Brookings Comprehensive Plan and adopt by reference the 2026 – 2046 Brookings Housing Needs Analysis, and that City Council adopt the amendment as presented.