



## AGENDA PLANNING COMMISSION

Monday, April 27, 2026  
at 7:00 p.m.

Stayton Community Center  
400 W. Virginia Street  
Stayton, Oregon 97383

### HYBRID MEETING

The Stayton Planning Commission will be holding a hybrid meeting utilizing Zoom video conferencing software. The meeting will be in-person but can also be attended virtually. If you would like to virtually participate in the meeting, please contact the Susan Bender at [sbender@staytonoregon.gov](mailto:sbender@staytonoregon.gov) to receive an invitation to the online meeting.

#### 1. CALL TO ORDER

#### 2. MEETING MINUTES

- a. Approval of March 30, 2026, Minutes

#### 3. PUBLIC HEARING (Rehearing – Continued from February 23, 2026)

**LAND USE FILE #5-02/24 – Application for Annexation of an approximately 21-acre property on Golf Lane tax lot 091W03B001500 into the City Limits to be zoned as Medium Density (MD) Residential.**

- a. Staff Introduction and Report
- b. Applicant Presentation
- c. Questions from the Commission
- d. Questions and Testimony from the Public
- e. Applicant Summary
- f. Staff Summary
- g. Close of Public Hearing
- h. Commission Deliberation
- i. Commission Decision

#### 4. PUBLIC HEARING (Continued from February 23, 2026)

**LAND USE FILE #10-08/25 – Application for Annexation of an approximately 17.01-acre property on 11641 Shaff Road taxlot 091W04C001901 to be zoned High Density (HD) Residential zone.**

- a. Staff Introduction and Report
- b. Applicant Presentation
- c. Questions from the Commission
- d. Questions and Testimony from the Public
- e. Applicant Summary
- f. Staff Summary
- g. Close of Public Hearing

- h. Commission Deliberation
- i. Commission Decision

**5. OTHER BUSINESS**

**6. ADJOURN**

*The meeting location is accessible to people with disabilities. A request for an interpreter for the hearing impaired or other accommodations for persons with disabilities should be made at least 48 hours prior to the meeting. If you require special accommodation, contact the Community and Economic Development Department at (503) 769-2998.*

# STAYTON PLANNING COMMISSION MEETING MINUTES

Monday, March 30, 2026

**COMMISSIONERS:** Larry McKinley – Chair (present)  
Peter Bellas (present)  
Amy Watts (via Zoom)  
Melissa Satowskis (present)  
Steve Baldwin (Present)

**STAFF MEMBERS:** Jennifer Siciliano, Community & Economic Development Director  
Susan Bender, Public Works Office Specialist

**OTHERS PRESENT:** Scott Lunski, Applicant; Tim Zerkel, Applicant; Brian Quigley, Mayor; Steve Sims, City Councilor

**CALL TO ORDER:** Chairman Larry McKinley called the meeting to order at 7:00 pm. Quorum is present.

**APPROVAL OF MINUTES:** Ms. Sutkowski moved, and Mr. Bellas seconded to approve the minutes from February 23, 2026, as presented. Motion passed 5:0.

**PUBLIC HEARING: Land Use File #1-01/26: Application for a Variance to the rear yard setback at 2250 Springbreeze Ct (Tax Lot 091W03DC07200) in the Low-Density Residential Zone**

**Commencement of Public Hearing-** Chair McKinley read the opening statement and opened the hearing at 7:00 pm. No objections were made by the attendees to the notice in this case or the jurisdiction of this body to hear the case. There were no declarations of conflict of interest, *ex-parte* contact, or bias by members of the Planning Commission.

**Staff Introduction and Report** – Ms. Siciliano summarized the applicant’s variance request to allow a 7-foot setback. Stayton Municipal Code requires a 20-foot at 2250 Springbreeze Ct, located in a Low-Density residential zone. The applicant, Tim Zerkel on behalf of the homeowner, wishes to construct a home office addition off the back of their home, a dwelling of approximately 1,960 square feet. The lot is irregular in shape, includes an angled corner that constrains the placement of additions, and is not typical of surrounding properties. These conditions were not created by the applicant. Together these constitute an exceptional circumstance applicable to the variance criteria. The proposed addition is permitted residential use within the LD zone. The proposed setback reduction is not expected to create adverse impacts on surrounding properties. Staff recommended approval of the application.

**Applicant Presentation** – Tim Zerkel as the applicant outlined project details and reasons for the request. Homeowner is a stay-at-home parent looking to work at home as well.

**Questions from the Commission-** Mr. Baldwin asked if the homeowner is ok with noises from the trail behind their home, since the office addition will put them closer to the trail. Mr. Zerkel responded that with Santiam Park right next door, they are quite accustomed to the noise in the neighborhood. No further questions.

**Questions and Testimony from the Public-** None

**Staff Summary-** Nothing more to add.

**Close of Hearing-** Chair McKinley closed the hearing at 7:07 pm.

**Commission Deliberation-** Mr. McKinley asked for motion from the Commission. Ms. Sutkowski moved to approve the application for the variance of Tim Zerkel (Land Use File #1-01/26) and adopt the draft order presented by Staff. Mr. Bellas seconded. The motion carried 5:0.

**PUBLIC HEARING: Land Use File #13-11/25 – Application for a Site Plan Review for a proposed development at 1319 W. Washington Street (Tax Lot 091W09DA01103) in the Light Industrial (IL) Zone.**

**Commencement of Public Hearing-** Chair McKinley read the opening statement and opened the hearing at 7:00 pm. No objections were made by the audience to the notice in this case or the jurisdiction of this body to hear the case. There were no declarations of conflict of interest, *ex-parte* contact, or bias by members of the Planning Commission.

**Staff Introduction and Report –** Ms. Siciliano summarized the applicant’s Site Plan Review request for a proposed development at 1319 W. Washington St, located within the Light Industrial (IL) zone. The proposal consists of two buildings—a two story, 1,200 square-foot office and storage building, and a 2,400 square-foot storage building—with a shared loading dock and surface parking, on a 22,216 square-foot parcel. Access to the site is proposed via a single driveway from W Washington St. The site plan includes seven off-street parking spaces and associated pedestrian connections. Staff recommends approval of the application subject to conditions.

**Applicant Presentation –** Scott Lunski on behalf of Lunski Properties, LLC presented a brief outline of the proposed project and noted that the Commission had heard this proposal previously, but the process expired before they could move forward.

**Questions from the Commission-** No questions from the Commission.

**Questions and Testimony from the Public-** None

**Staff Summary-** Nothing more to add.

**Close of Hearing-** Chair McKinley closed the hearing at 7:11 pm.

**Commission Deliberation-** Ms. Sutkowski moved to approve the application for the Site Plan Review of a proposed development at 1319 W. Washington St by Lunski Properties, LLC (Land Use File #13-11/25) and adopt the draft order presented by staff. Mr. Bellas seconded. The motion carried 5:0.

**ADJOURN:** Chair McKinley adjourned the meeting at 7:18 pm.

# City of Stayton

## MEMORANDUM

**TO:** Chairperson Larry McKinley and Planning Commission Members

**FROM:** Jennifer Siciliano, Director of Community and Economic Development

**DATE:** April 27, 2026

**SUBJECT:** Annexation – KSD Properties, LLC (Golf Lane)

**120 DAYS ENDS:** Not applicable – Annexation

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### ISSUE

The issue before the Planning Commission is a continued public hearing on an application for annexation of an approximately 21-acre property located on Golf Lane (Tax Lot 091W03B001500), with a proposed zoning designation of Medium Density (MD) Residential.

The Planning Commission previously held public hearings in November 2025 and February 23, 2026. At the February hearing, a comment letter from the Oregon Department of Land Conservation and Development (DLCD) was entered into the record. The hearing was continued to April 27, 2026, to allow staff to incorporate DLCD's comments into the findings and draft order.



### BACKGROUND

The subject property is approximately 21 acres, vacant, and located in Marion County fronting Golf Lane. It is currently zoned Urban Transition (UT-20) and lies within the Stayton Urban Growth Boundary (UGB) but outside the city limits. The surrounding area consists of a mix of City and County jurisdictions. The property to the north has been annexed into the City and is zoned Commercial General (CG), Golf Lane to the east is within the City limits, and the land across the roadway is owned by the Oregon Department of Transportation. The properties to the south remain under County jurisdiction and are developed with large-lot residential uses, while the property to the west is part of the Stayton Middle School campus.

# City of Stayton

The applicant has proposed annexation of the property along with the application of Medium Density (MD) Residential zoning and has submitted a conceptual plan illustrating a 74-lot subdivision.

At the November 2025 hearing, the Planning Commission recommended approval of the annexation with Low Density (LD) Residential zoning. Since that time, additional information from DLCD, as well as changes and clarifications in state housing law, require reconsideration of that recommendation.

## **ANALYSIS**

Since the February 23, 2026 hearing, staff has revised the draft order of recommendation to incorporate comments from DLCD and to reflect current state law. DLCD's comments emphasize that, pursuant to House Bills 2001 and 2889, the City should utilize the Oregon Housing Needs Analysis (OHNA) when evaluating housing needs. The OHNA is a statewide methodology that allocates housing needs to local jurisdictions and requires that the needs to be accommodated within urban growth boundaries. For the City of Stayton, the OHNA identifies a 20-year housing need of 1,058 dwelling units across a range of income levels.

This represents a shift from the City's prior reliance on the Buildable Lands Inventory, as the OHNA incorporates not only projected future growth but also existing unmet housing need resulting from underproduction. As a result, the analysis supporting this annexation has been updated to reflect the City's obligation to plan for and accommodate a broader range of housing types and affordability levels.

In addition to the OHNA framework, state housing law has evolved in a way that directly affects how residential zoning must be considered. Under current law, duplexes are now permitted on all residentially zoned parcels in cities of Stayton's size. This includes properties zoned Low Density (LD), Medium Density (MD), and High Density (HD). As a result, there is no longer a regulatory framework in which LD zoning can be characterized as exclusively single-family housing. Duplexes are also now permitted in the High Density Residential zone, where they were not previously allowed. This change reduces the distinction between residential zones in terms of allowed housing types and shifts the focus more toward overall capacity and density.

Based on these changes, the prior rationale for recommending Low Density zoning—primarily to limit housing type and intensity—is no longer supported by state. Instead, the City must ensure that its zoning designations provide sufficient capacity to meet identified housing needs under the OHNA framework. The Medium Density (MD) zone, which allows a broader range of housing types and densities, better aligns with this requirement and supports the City's ability to accommodate its allocated housing needs.

Staff has also revised the draft order to reflect guidance from the City Attorney regarding annexations. Annexations are legislative decisions that must be approved or denied based on applicable criteria and should not include conditions of approval. As a result, references to requiring a Transportation Impact Analysis (TIA) as part of the annexation have been removed. Transportation and infrastructure requirements will be addressed at the time of development through separate review processes, where a TIA and other studies can be required as applicable.

Overall, the revised draft order incorporates DLCD's comments, reflects the OHNA methodology, aligns with current state housing law, and removes annexation conditions consistent with legal guidance. These updates result in a change to staff's recommendations.

## **RECOMMENDATION**

# City of Stayton

Staff recommends that the Planning Commission approve the annexation and recommend application of Medium Density (MD) Residential zoning to the subject property. This represents a change from the prior recommendation of Low Density zoning and is based on the updated analysis incorporating DLCD comments, the Oregon Housing Needs Analysis (OHNA), and current state housing law.

## **OPTIONS AND SUGGESTED MOTIONS**

Staff has provided the Planning Commission with a number of options, each with an appropriate motion.

### **1. Approve the application, adopting the draft order of recommendation as presented.**

I move the Stayton Planning Commission recommend approval of the application for Annexation for KSD Properties, LLC for a 21-acre property on Golf Lane (Tax Lot 091W03B001500), (Land Use File #5-02/24) and assignment of Low Density Residential zoning to the property, adopting the draft order of recommendation as presented by Staff.

### **2. Approve the application, adopting modifications to the draft order of recommendation.**

I move the Stayton Planning Commission recommend approval of the application for Annexation for KSD Properties, LLC for a 21-acre property on Golf Lane (Tax Lot 091W03B001500), (Land Use File #5-02/24) and assignment of Low Density Residential zoning to the property, adopting the draft order of recommendation with the following changes...

### **3. Continue the hearing until May 26, 2026.**

I move the Stayton Planning Commission continue the public hearing on the application for Annexation for KSD Properties, LLC for a 21-acre property on Golf Lane (Tax Lot 091W03B001500), (Land Use File #5-02/24) until May 26, 2026.

### **4. Deny the application, directing staff to modify the draft order of recommendation.**

I move the Stayton Planning Commission to recommend denial of the application for Annexation for KSD Properties, LLC for a 21-acre property on Golf Lane (Tax Lot 091W03B001500), (Land Use File #5-02/24) and direct staff to modify the draft order of recommendation to reflect the Planning Commission's discussion and bring a revised draft order of recommendation for Planning Commission approval at the May 26, 2026, meeting.

### **5. Close the hearing but keep the record open for submission of written testimony.**

I move the Stayton Planning Commission close the hearing on the application for Annexation for KSD Properties, LLC for a 21-acre property on Golf Lane (Tax Lot 091W03B001500), (Land Use File #5-02/24) but maintain the record open to submissions by the applicant until May 4, allowing 7 days for review and rebuttal and then an additional 7 days for the applicant to reply, with final closure of the record on May 26, 2026.

### **6. Close the hearing and record, and continue the deliberation to the next meeting.**

I move the Stayton Planning Commission continue the deliberation on the application for Annexation for KSD Properties, LLC for a 21-acre property on Golf Lane (Tax Lot 091W03B001500), (Land Use File #5-02/24) until May 26, 2026.

**BEFORE THE STAYTON PLANNING COMMISSION**

In the matter of  
the application of  
KSD Properties, LLC

)  
) Annexation  
) File # 5-02/24  
)

**ORDER OF RECOMMENDATION**

**I. NATURE OF APPLICATION**

The applicant has submitted an application for annexation of a 21-acre parcel of land fronting Golf Lane (tax lot 091W03B001500), proposing a zoning designation of Medium Density (MD) Residential and including a concept plan for a 74-lot subdivision into city limits.

**II. PUBLIC HEARINGS**

A public hearing was held on the application before the Stayton Planning Commission on November 24, 2025. At that hearing the Planning Commission reviewed Land Use File #10-08/25 application for annexation was made part of the record. Following that hearing it was discovered that notice had not been provided to the Oregon Department of Land Conservation and Development (DLCDC), as required by ORS 197.610. A second public hearing was held on February 23, 2026. A comment letter from the DLCDC was received on February 23, 2026. In order to incorporate the DLCDC’s comments into the findings and evaluate any potential impacts, the public hearing was continued to April 27, 2026.

**III. FINDINGS OF FACT**

**A. EXISTING CONDITIONS**

1. The owner of the property and the applicant is KSD Properties, LLC.
2. The parcel can be described as: taxlot 091W03B001500.
3. The property is currently outside of the City Limits and zoned Marion County Urban Transition (UT-20).
4. The property is approximately 21 acres with frontage on Golf Lane and is currently vacant.
5. The property to the north was annexed into the City in 2019, is zoned Commercial General (CG) and is also owned by KSD Properties, LLC. To the east, Golf Lane, has also been annexed into the City. Across Golf Lane is land owned by the Oregon Dept of Transportation, obtained as part of the Hwy 22 interchange development project. The properties to the south have not been annexed, remain under Marion County jurisdiction, are zoned Urban Transition (UT-20) and are vacant and developed as single unit dwelling. The property to the west is within

the City limits, is part of the Stayton Middle School campus, and is zoned Public/Semi-Public (P).

#### B. PROPOSAL

The proposal is to annex a 21-acre parcel of land fronting Golf Lane (tax lot 091W03B001500) into the city. The applicant has proposed that Medium Density (MD) Residential zoning be applied at the time of annexation.

#### C. AGENCY COMMENTS

The following agencies were notified of the proposal: City of Stayton Public Works, Stayton Cooperative Telephone Company, Pacific Power, NW Natural Gas, Stayton Fire District, Marion County Public Works, Wave Broadband, Marion County Planning Division, Santiam Water Control District, Santiam Hospital, Stayton Police Department, City of Salem Development Services, and the North Santiam School District. Additionally, a Post Acknowledgement Plan Amendment (PAPA) was submitted to Oregon Department of Land Conservation and Development (DLCD) for notice file no. 001-26.

Stayton Public Works provided a memorandum dated November 13, 2025, authored by the City's consultant engineer. In addition, the City's transportation engineering consultant submitted comments in an email of the same date. These comments are incorporated into the findings below.

The City received a letter from the Oregon Department of Land Conservation and Development dated February 23, 2026, stating that, pursuant to Oregon House Bill 2001 and Oregon House Bill 2889, the City should utilize the Oregon Housing Needs Analysis allocations established for each local government. The letter indicates that, pursuant to the January 1, 2026 publication, the City of Stayton's 20-year housing need within the Urban Growth Boundary is 1,058 dwelling units, distributed across income categories as follows: 271 units at 0–30% Area Median Income (AMI); 204 units at 31–60% AMI; 113 units at 61–80% AMI; 171 units at 81–120% AMI; and 300 units above 120% AMI. Additionally, a virtual meeting with DLCD was held on March 26, 2026, to further discuss and clarify their comments.

Stayton Fire District stated that they had no comment. Marion County Public Works stated that they did not have any comment at this time, but they will at time of development. No other review comments were received.

#### D. PUBLIC COMMENTS

The Community and Economic Development Department notified all owners of property within 300 feet of the subject property prior to each public hearing and has received two public comments on these applications. Carlos Gonzales of 12173 Golf Lane has submitted concerns about the potential development of the property. Carl Gomoll submitted comments. Both Mr. Gonzales and Mr. Gomoll provided testimony at the November public hearing. Two other individuals testified at the November public

hearing. Where the public testimony addressed approval criteria, it is summarized and included in the findings below.

E. ANALYSIS

Annexation applications are required to satisfy approval criteria contained within Stayton Municipal Code (SMC) Title 17, Section 17.12.210.

F. REVIEW CRITERIA

Pursuant to SMC 17.12.210.4 the following criteria must be demonstrated as being satisfied by the application:

a. *Need exists in the community for the land proposed to be annexed.*

Finding: The 2013 Stayton Comprehensive Plan update included a Buildable Lands Inventory (BLI). The 2013 BLI provides the following information on projected growth and need for additional land in the community. At that time, there were 106 acres of vacant buildable land inside the City limits in the Low, Medium, and High Density Residential Zones. The projected population for the City in 2030 (at a medium growth rate of 1.7%) was 11,359 people, requiring an additional 1,281 dwellings. To meet that need, the City Comprehensive Plan indicates the expected need of additional 320 acres of residential to be annexed into the City. Since the time that analysis was conducted, the City has annexed 60 acres of residential land.

The need for 1,281 additional units was broken up into 889 single-family detached dwellings, 193 duplexes, 174 multi-family units, and 25 mobile homes. It is projected that the percentage of homes are needed at the following: single-family detached dwellings 65%, duplexes (or attached single-family homes) 13%, multi-family units 18%, and mobile homes 4%.

Since the BLI has been calculated, the following is a table of developments, year, type of housing unit, and number.

Project Name	Year	Type	Number
Phillips Estates, Phase 2	2014	single-family home	21
Phillips Estates, Phase 3	2025/26	single-family home	22 (concept plan)
Wildlife Meadows	2017	single-family home	42 (2 duplexes)
Hayden (Lambert Place)	2020	single-family home	51
Fern Ridge	2022	multi-family	72
East Santiam Duplexes	2023	duplexes	18 (9 duplexes)
Shaff Square	2023	multi-family	100

Based on these totals, Stayton’s housing needs are as follows: 753 single-family homes, 182 duplex or attached single-family units, 2 multifamily units, and 25 mobile homes.

These projections are based on a higher anticipated growth rate than what has actually occurred, meaning the calculated housing needs may be somewhat overstated. From 2000 to 2025, Stayton’s population increased from 6,816 to 8,280—a change of 1,464 people—reflecting an average annual growth rate of approximately 0.86%. The

Marion County Coordinated Growth projection of 1.6% average annual growth rate was used in the projected needs.

The City's Comprehensive Plan Housing Goal (Chapter 6) states: "Existing and future residents will be provided a choice of housing types in safe and healthful housing." While the City currently provides a range of housing types, application of the Medium Density (MD) Residential zone to the subject property would further expand those opportunities. The MD zone permits single-family detached dwellings, duplexes, triplexes, and accessory dwelling units (ADUs), with a maximum density of 12 dwelling units per acre.

The applicant has submitted a conceptual plan proposing 74 single-family lots. However, under the full range of uses permitted in the MD zone, the site could accommodate up to 128 duplex units and 30 triplex units. Triplexes are permitted on lots of at least 10,500 square feet, and approximately 10 of the proposed lots meet this threshold. On a gross basis consistent with MD standards, the approximately 21-acre site could accommodate up to 252 dwelling units, consistent with the maximum density of 12 units per acre.

In 2023, the State adopted a new methodology for determining housing needs through the Oregon Housing Needs Analysis (OHNA). Under ORS 197A.018, "needed housing" is defined as housing by affordability level, type, characteristics, and location necessary to accommodate a city's allocated housing need over the applicable 20-year planning period. The OHNA represents a shift from a locally derived housing needs analysis to a statewide, regionally informed methodology that accounts for both future growth and existing unmet need resulting from underproduction of housing.

As described in the Department of Administrative Services (DAS) January 1, 2026, methodology, housing need now includes both projected future demand and existing unmet need, including suppressed household formation due to housing costs and limited supply. The methodology allocates a share of regional housing need to each local government. Stayton is located within the Willamette Valley region, and, consistent with state policy, urban housing needs are to be accommodated within Urban Growth Boundaries.

The DAS 2026 analysis identifies a 20-year housing need within Stayton's Urban Growth Boundary of 1,058 dwelling units, distributed across income levels as follows: 271 units at 0–30% Area Median Income (AMI); 204 units at 31–60% AMI; 113 units at 61–80% AMI; 171 units at 81–120% AMI; and 300 units above 120% AMI.

Analysis: Under the State's revised methodology, housing needs include both existing unmet needs resulting from underproduction and projected future demand, which is allocated at the regional level and accommodated within Urban Growth Boundaries by local jurisdictions.

This annexation would increase the City’s supply of buildable residential land and capacity, supporting its ability to provide a range of housing types and accommodate identified housing needs consistent with the City’s Comprehensive Plan Housing Goal, Statewide Planning Goal 10, ORS 197.296, and the OHNA framework.

*b. The site is or is capable of being serviced by adequate City public services, including such services as may be provided subject to the terms of a contract annexation agreement between the applicant and the City.*

Finding: While the property is not currently connected to City utilities, the City’s adopted master plans (Transportation, Water, Stormwater, and Wastewater) provide clear pathways for extending services. At the time of development, the applicant will be required to construct or extend infrastructure to meet all applicable standards, ensuring the property can be fully and adequately served.

#### Streets

Golf Lane, which forms the eastern boundary of the property, is designated as a future City Collector and will need to be improved to Collector standards, including curbs, sidewalks, street trees, street lighting, and adequate pavement width. Internal Local streets will also need to be constructed within the property as shown on the conceptual plan. Although the nearest City intersections are approximately 1,000 to 1,500 feet away, the Transportation System Plan identifies future projects—such as the realignment of Golf Lane and its eventual extension west—that will improve connectivity. Emergency vehicle access will need to comply with the Stayton Municipal Code, Public Works Design Standards, and Fire District requirements at the time of development.

The application included a Transportation Impact Analysis (TIA) prepared by Jenna Bogert, PE. The TIA looked at the projected impacts of a 92-lot residential subdivision, assuming single family dwellings on each lot. The TIA assessed the impacts of development on the intersections of Cascade Highway and the Oregon 22 ramps, the Golf Lane/Park & Ride intersection, the Whitney St intersection, and the Shaff Rd/Fern Ridge Rd intersection. The TIA noted that no intersection improvements were warranted.

Written comments and testimony at the public hearing expressed concerns over traffic impacts. The annexation is not accompanied by a concurrent application for development but includes a conceptual plan for a 74-lot subdivision. Most public comments addressed the impacts of development, not the annexation of property into the city limits. Development of the subdivision will include a separate application and review process, at which time a thorough review of transportation impacts will be conducted.

There is a 2003 City–County Memorandum of Understanding for the Sublimity Interchange Area Management Plan allows Golf Lane to remain in its current location as long as vehicle queues from the Whitney Street signal do not interfere with turning movements on Golf Lane and County safety and operational standards are met. The

TIA determined that the development would not trip the thresholds for realignment of Golf Lane.

The TIA was reviewed by the City's transportation planning consultant who noted that the TIA is based on the previous submission of 92 single-family homes. The consultant recommended that the TIA be updated to reflect the current conceptual plan for 74 lots determine if realignment of Golf Lane is necessary. Yet, with fewer parcels proposed, traffic demand would be expected to be lower than that analyzed in the submitted TIA. Marion County had no comments on the TIA.

#### Stormwater Drainage

The City's engineering consultant has stated that the site can be served by the City's storm drainage system once infrastructure is extended and required stormwater facilities are constructed. The property is not currently served by City storm drainage, with the nearest storm system approximately 1,500 feet southeast at Whitney Street and Cascade Highway SE. Existing shallow ditches along Golf Lane do not connect to an approved discharge point. At development, a complete stormwater management system—including flow control, water-quality treatment, and conveyance—will be required in accordance with the Stormwater Master Plan and Public Works Design Standards. Stormwater from this property ultimately drains to Mill Creek, and nearby existing detention and wetland features will remain protected under the Master Plan.

#### Water

The City's engineering consultant has stated that the water service can be provided to the site through future extensions of City water infrastructure identified in the Water Master Plan. No City water system currently exists near the property, and the nearest 12-inch water main, located approximately 1,500 feet to the southeast, is part of the Upper Pressure Zone and cannot serve this area. The property lies within the Mill Creek Upper Pressure Service Area, where necessary infrastructure has not yet been built. The Water Master Plan includes a future Mill Creek Booster Station near the intersection of Golf Lane and Cascade Highway SE and a 12-inch distribution main to be extended through Golf Lane. At the time of development, the property will be required to extend the water system and meet all emergency water supply and fire flow requirements.

#### Sanitary Sewer

The City's engineering consultant has stated that the sanitary sewer service can be extended to the property as part of future development. The site is located within the Mill Creek Pump Station Basin, and the nearest sanitary sewer mains are a 12-inch main located approximately 1,800 feet southeast at Martin Drive and Cascade Highway SE, and another 12-inch main located about 2,300 feet northwest in Golf Lane. The property is not currently served by City sewer infrastructure, and connection to either main will require engineering analysis demonstrating adequate capacity for additional flows. The Wastewater Facilities Planning Study does not identify significant system deficiencies in the vicinity that would affect the ability to serve the site.

*c. The proposed annexation is property contiguous to existing City jurisdictional limits.*

Finding: The property is adjacent to the City limits to the north, east and to the west.

*d. The proposed annexation is compatible with the character of the surrounding area and complies with the urban growth program and the policies of the City of Stayton.*

Finding: The property to the north is zoned Commercial General (CG) and is not yet developed. To the east, Golf Lane has been annexed into the City, and the property across the road is owned by the Oregon Department of Transportation. The property to the south contains large-lot single-family homes and remains under Marion County jurisdiction. To the west, the Stayton Middle School campus includes a forested area used for cross-country races.

The subject property is located within the Stayton Urban Growth Boundary and is designated Residential in the Comprehensive Plan. The application of Medium Density (MD) zoning upon annexation is consistent with this designation and supports the planned future character of the area. The property is adjacent to property zoned commercial – Commercial General (CG) – and in proximity to the highway interchange; as such, MD zoning provides an appropriate transition between commercial uses and lower-density residential areas.

*e. The annexation request complies or can be made to comply with all applicable provisions of state and local law.*

Finding: The criteria of ORS 222 apply to the adoption of an annexation ordinance which is a City Council action. The property owners have consented to the annexation. The property is contiguous to the existing city limits and is located entirely within the City of Stayton’s Urban Growth Boundary. The acknowledged Stayton Comprehensive Plan designates this area as Residential.

*f. If a proposed contract annexation, the terms and conditions, including the cost of City facility and service extensions to the annexed area shall be calculated by the Public Works Director.*

Finding: The proposed annexation is not a contract annexation.

#### **IV. CONCLUSION**

Based on the facts above, the Planning Commission concludes that the application meets the requirements for Sections 17.12.210.4 Annexation Approval Criteria.

#### **V. RECOMMENDATION**

Based on the Findings and Conclusions above, the Planning Commission recommends approval of the application for annexation to the City Council and amendment of the Official Zoning Map to designate the property as Medium Density (MD) Residential.

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Larry McKinley, Chairperson

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Date

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Jennifer Siciliano,  
Community and Economic Development Director

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Date

DRAFT



# Oregon

Tina Kotek, Governor

Department of Land Conservation and Development

635 Capitol Street NE, Suite 150

Salem, Oregon 97301-2540

Phone: 503-373-0050

Fax: 503-378-5518

[www.oregon.gov/LCD](http://www.oregon.gov/LCD)

February 23rd, 2026

Jennifer Siciliano, City Planner  
City of Stayton  
362 N. Third Avenue, Stayton, Oregon 97383  
(503) 769-2998  
[jsiciliano@staytonoregon.gov](mailto:jsiciliano@staytonoregon.gov)



**Subject:** Comments on:

(1) PAPA DLCD File No. 001-25 Annexation of three (3) parcels 1) 9164 Golf Club Rd SE, Aumsville, OR, 2) 9384 Golf Club Rd SE, Aumsville, OR (part of parcel to be partitioned), 3) 9474 Golf Club Rd SE, Aumsville, OR (part of parcel to be partitioned) and change zoning from Urban Transitional (UT) to Medium Density (MD) Residential zone - change is consistent with the Comprehensive Plan.

(2) PAPA DLCD File No. 001-26 Annexation with zoning change to Medium Density (MD) Residential from Marion Co. Urban Transitional (UT) consistent with Comprehensive Plan for one parcel Map Tax Lot 091W03B001500; and

(3) PAPA DLCD File No. 002-26 for a Zoning change from Marion Co. Urban Transitional (UT) to City of Stayton High Density (HD) Residential consistent with Comprehensive Plan for one parcel Map Tax Lot 091W04C001901;

Dear Ms. Siciliano,

Thank you for the opportunity to comment on the above-referenced applications. We have reviewed the materials submitted and would like to submit the following comments for the record:

The above-referenced Post-acknowledgment Plan Amendments (PAPAs) all concern the application of urban zoning to properties that will be zoned for residential development. As such, we have consolidated our general comments that are applicable to all three PAPAs that are similar in nature. Specifically, none of the above-referenced PAPAs have staff reports uploaded to the record; however, for PAPA No. 001-26, Department of Land Conservation and Development (DLCD) staff were able to find a Planning Commission staff recommendation on the city's website dated November 13, 2025, that contained the following findings and condition:

*“**Analysis:** The City has a limited number of residential units needed based on the Buildable Lands Inventory (BLI), which assumes a growth rate higher than what has actually occurred. Under these projections, the number of multifamily units allowed in the MD zone would exceed the number needed in the City. If the property were*

*annexed with a Low Density (LD) Residential zoning designation, it would be less likely to exceed the projected need for single-family homes identified in the BLI. **Condition:** The annexation application should be approved with a Low Density (LD) Residential zoning designation to better meet the housing needs of the community.”*

We want to highlight a few concerns regarding the staff recommendation to reduce the residential density zoning designation for the urbanizing lands associated with these PAPAs.

In the 2023 legislative session, [House Bills 2001](#) and [2889](#) codified the Oregon Housing Needs Analysis (OHNA), a statewide methodology for allocating housing need to each local government in the state. Pursuant to Oregon Revised Statute (ORS) 184.453, Oregon’s Department of Administrative Services (DAS) updates the methodology publishes the allocation of housing need for each local government annually. According to [DAS’ January 1, 2026 publication](#) (the most current), the city of Stayton received the following allocation of housing need (refer to page 67):

Willamette Valley UGBs	Results	Total	0-30% AMI	31-60% AMI	61-80% AMI	81-120% AMI	>120% AMI
Stayton UGB	1 year	68	22	14	7	10	15
	20 year	1,070	278	208	115	174	295

With the codification of the OHNA into state housing law, the Oregon Legislature updated the definition of “Needed Housing” under ORS 197A.018. The amended statute includes clear requirement for local governments to utilize the state allocation of housing need from the OHNA rather than using local population estimates. ORS 197A.018 states:

*(1)(a) “Needed housing” means housing by affordability level, as described in ORS 184.453 (4), type, characteristics and location that is necessary to accommodate the city’s allocated housing need over the 20-year planning period in effect when the city’s housing capacity is determined.*

In the Department’s understanding, the city is relying on a population projection that was adopted for the 2010-2030 planning horizon in developing findings related to the proposal. The department encourages the city to recognize and incorporate the most up to date information available about the city’s housing needs published by DAS in their recommendation on the proposal. This not only provides a more accurate description of the city’s housing needs but also better aligns with the expressed housing planning policies of the state.

Additionally, the department notes that the findings included in the staff recommendation also appear to contradict the city’s comprehensive plan, particularly as it relates to the city’s housing goal within Chapter 6 and the residential purpose within the Land Use Chapter 8:

*Chapter 6: “EXISTING AND FUTURE RESIDENTS WILL BE PROVIDED A CHOICE OF HOUSING TYPES IN SAFE AND HEALTHFUL HOUSING”*

*Chapter 8: “To provide areas for residential development. The Residential area may be further divided into zones that provide for single family residences only, allow mix of single family, duplex and triplex development, and provide adequate opportunities for higher density multifamily development. The overall goal for residential development shall be to provide a mix of housing opportunities in the City and provide an overall gross density of residential development of approximately 6 units per acre.”*

Despite this language, and the city having received an application that would allow medium and high-density residential development (which would provide a needed mix of housing as specified in the Stayton comprehensive plan), the city’s recommendation appears to propose low density residential zoning. The acknowledged comprehensive plan housing goals outlined in Chapter 6 require existing and future residents be provided a choice of housing types in safe and healthful housing. The comprehensive plan language also includes a definition of the residential land use designation to “provide for single family residences only, allow mix of single family, duplex and triplex development, and provide adequate opportunities for higher density multifamily development”.

For each of these PAPAs we recommend that the city address the zone change’s consistency with applicable sections of the Comprehensive Plan that call for a mix of housing types and opportunities for higher density housing, as well as consider the application of needed housing as required by ORS 197.018.

Please feel free to contact me at 503-930-9739 or [melissa.ahrens@dlcd.oregon.gov](mailto:melissa.ahrens@dlcd.oregon.gov) if you have any questions.

Sincerely,



Melissa Ahrens  
Regional Representative  
DLCD

cc: Gordon Howard  
Ethan Stuckmayer



**CITY OF STAYTON**  
**M E M O R A N D U M**

**TO: Planning Commission**  
**FROM: Jennifer Siciliano, Community and Economic Development**  
**DATE: April 16, 2026**  
**SUBJECT: Virtual Meeting with DLCD March 26, 2026**

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**Summary of Virtual Meeting with DLCD – March 26, 2026**

I participated in a virtual meeting with staff from the Oregon Department of Land Conservation and Development, including Sean Edging, Jena Hughes, Ethan Stuckmayer, Josh LeBombard, and Melissa Ahrens to discuss how the City should approach housing need and zoning decisions in light of multiple pending annexation applications. The primary focus was the relationship between the City's Comprehensive Plan and the State's Housing Needs Analysis. DLCD confirmed the City may rely on its Comprehensive Plan as the legal basis for decisions, but emphasized that the State's housing needs allocations (based on income levels/AMI) reflect current law and should be incorporated into findings to strengthen the record. They noted that all residential zoning designations (LD, MD, and HD) are generally consistent with the Comprehensive Plan when the plan states Residential as a zone, and that the greatest legal risk is reducing density without clear, well-supported justification, particularly when relying on outdated data.

We also discussed the challenge of aligning housing types with affordability. DLCD acknowledged that zoning alone does not ensure affordability, but emphasized that allowing a broader mix of housing types, including higher-density and middle housing, supports overall housing availability and aligns with state policy. Staff raised concerns about the cumulative scale of proposed development and whether there is a point at which the City may limit growth. DLCD clarified that cities may not impose a cap on housing production and are expected to plan for at least the identified need, as housing development is considered a shared responsibility between the State, local governments, and the private market. With respect to infrastructure, DLCD indicated that if adopted master plans demonstrate the ability to serve growth, this generally supports approval, even if upgrades are required.

The discussion also included the role of the Housing Accountability and Production Office (HAPO), which was established under recent state legislation to support housing production and ensure compliance with state housing laws.

**From:** [gomolls@wvi.com](mailto:gomolls@wvi.com)  
**To:** [Jennifer Siciliano](mailto:Jennifer.Siciliano); [Aaron Frichtl](mailto:Aaron.Frichtl); [rjbmitch@gmail.com](mailto:rjbmitch@gmail.com); [Carlos Gonzales](mailto:Carlos.Gonzales)  
**Cc:** [Susan Bender](mailto:Susan.Bender)  
**Subject:** Documents for Record  
**Date:** Tuesday, April 14, 2026 2:16:34 PM  
**Attachments:** [Testimony.docx](#)  
[Golf Ln and Golf Club Presentation.pptx](#)

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**CAUTION:** This email originated from **Outside Your Organization**. Exercise caution when opening attachments or on clicking links from unknown senders. Please contact Information Technology for assistance.

Dear Ms. Siciliano,

Please find attached my written testimony and supporting presentation regarding the proposed annexation of Golf Lane (Land Use File #5-02/24). I respectfully request that these documents be entered into the official administrative record for the public hearing scheduled on the 17th of April 2026.

I will not be presenting oral testimony at this upcoming hearing. Instead, I am relying on my written submission to establish on the record that this application fails to meet the City's required legal standards for annexation.

Specifically, the enclosed data provides substantial evidence that the proposal does not satisfy Criterion A (Need) or Criterion C (Serviceable/Adequate Public Services). It is vital that these facts, including the outlined infrastructure deficits and lack of demonstrated population demand, are formally documented for the Planning Commission and City Council's review prior to any decision.

Please confirm receipt of this email and the inclusion of these documents in the hearing record.

Thank you for your time and assistance.

Sincerely,

**Carl Gomoll**

Golf Lane Resident Coalition

503.930.5173

Testimony to the Stayton Planning Commission

Regarding Land Use Files #16-12/24 and #5-02/24

Date: April 14, 2026

Speaker: Carl Gomoll, Golf Lane Resident Coalition

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[SLIDE 1: Title Slide – “Requirements”]

Introduction

Chairperson, Vice Chair, and members of the Commission. My name is Carl Gomoll, and I reside at 12174 Golf Lane SE. My letter is in behalf of the Golf Lane Resident Coalition. I am referring to the proposals for annexation of Golf Lane, Land Use File (LUF) #5-02/24 and Golf Club Rd, Land Use File # 16-12/24. I understand these are separate LUFs but they impact each other.

We are not here to say "no" to all growth. We are here to say "no" to speculative growth that our infrastructure cannot support and our job market does not justify.

I will demonstrate that the applications before you fail to meet Criterion A: The Need for Land and Criteria C: Providing Services. The City's finding of "need" relies on outdated math that ignores our stagnant job market, our actual population numbers, and a massive, unfunded financial and infrastructure backlog.

I have three specific points to present:

1. Point 1 is A "Phantom Demand": Our housing growth is outpacing our actual population growth.
2. Point 2 is The "Bedroom Community" Effect: Building homes without jobs damages our existing economy.
3. Point 3 is A "Unfunded Bill": We are facing over \$44 million in combined infrastructure deficits—specifically in the stormwater system and the Mill Creek Basin.

[SLIDE 2: Current Proposed Annexations]

From September of last year until March this year there is 4 proposed annexations and one that is approved for a Conceptual Plan. Totaling over 126 acres and 718 dwellings. I have also added the Golf Lane Collector to the slide as its importance will become evident.

[POINT to] There is the Golf Club Rd annexation, the Oriole Concept (Phillips Estate), Shaff Rd annexation, Golf Lane Annexation and the Park Lane annexation.

[SLIDE 3: The Disconnect: Population vs. Reality]

Point 1: The Outdated BLI vs. Real Numbers

The City's finding of "Need" relies on the 2013 Buildable Lands Inventory (BLI). That document assumes Stayton grows at 1.7% per year. Current U.S. Census shows from 2000 to 2025, Stayton's actual growth rate was only 0.8%—barely half of what was predicted.

The City of Stayton in 1998 Land and Housing Analysis used 2.7 people per household to calculate housing needs. The 2000 Census data reported 2.74 people per household in Stayton and the 2024 Census shows it has moved down to 2.54 persons per household in Stayton. I will continue to use 2.7 in my calculations.

Actual population growth is 0.8% annually, not the 1.7% assumed in the Stayton Comprehensive Planning document. The 2030 population target 11,359 is overstated. Based upon the U.S. Census Bureau the actual 2024 population is 8,520, leaving Stayton ~2,380 below the population goal for 2024. If trends mysteriously changed and we continued to use at least a 1.6% growth rate, or twice of what we are growing now, our adjusted population for 2030 would be 9,376 people with a housing need requirement of 3,472 dwellings.

As of 2024 we have 3,425 dwellings which is 269 houses over our 2024 actual needs. We will add 22 dwelling in 2025/26 with the Oriole concept plan (Phillips Estate) and that will take us to 3,447 or 25 houses short of the 2030 corrected projection. I remind you we have only been growing at half that, 0.8 percent. Based on the U.S. Census Bureau and our projected trend we do not need to add any dwellings to meet our population growth of 2030, But yet we are entertaining proposals to add 718 more dwellings.

Housing demand follows jobs. But the City's own Economic Development Strategy highlights a "History of No Growth" in the industrial sector between 2005 and 2018. While we have added 212 housing units since 2022, we have not seen a parallel surge in family-wage employment.

What happens when you build new homes in a stagnant job market?

You don't get new residents; you get a "Housing Shuffle."

- People move from older, affordable homes in Stayton to the new subdivisions.
  - This leaves vacancies in our established neighborhoods, depressing property values for long-time residents and landlords
  - Without new jobs bringing new money into town, we are simply cannibalizing our own tax base while adding miles of new roads to maintain.
- 

[SLIDE 4: The Economic Reality: Job Stagnation]

Point 2, We are becoming a "Bedroom Community" or "Commuter Town" by design, not by accident.

- U.S. Census data confirms that 82% of our workforce drives out of Stayton every morning to work in a different city. That is 4 out of every 5 workers in your neighborhood leaving.
- This creates massive "peak hour" congestion on Cascade Highway and Golf Club Road as everyone tries to leave at 7:30 AM and return at 5:30 PM. Adding hundreds of new homes here just adds hundreds of cars to that specific jam.
- When people work in Salem, they buy lunch in Salem. They get gas in Salem. They shop at Costco, Walmart or Winco in Salem before they come home. That activity serves Salem's tax base, not Stayton's.
- In municipal finance, residential neighborhoods are a "net negative" on a cities budget. Property taxes rarely cover the full cost of roads, police, and parks. Cities stay solvent because Commercial and Industrial properties subsidize the residential ones.
- Stayton has had zero new industrial growth in over a decade. By annexing and adding residential land, we are adding to the "cost" side of the ledger without adding to the "revenue" side. We are digging a financial hole. Every new subdivision built without a corresponding employer is a new long-term liability for the City's general fund.
- We aren't losing jobs because we lack housing. We are losing them because of the \$2.85 million Shaff/Wilco Roundabout requirement and high utility rates. Building more houses doesn't fix the roundabout; it just clogs the intersection further, making it even harder for industry to ever locate here.

- Lets Look at our neighbors. Sublimity is growing slowly at 0.2 percent and funding infrastructure with grants, not tax hikes. In July 2025, Aumsville updated their System Development Charges (SDCs) to legally ensure that 'growth pays for growth'. They raised their fees to over \$6,700 per home just for parks, ensuring that developers—not taxpayers—fund their new 23-acre Eastside Community Park. Stayton is doing the opposite: we are approving annexations without updating our fees, leaving existing residents to bail out the infrastructure deficit. Stayton is the only one aggressively annexing land without updating our fees or fixing our deficits. Why are we choosing the riskiest path in the canyon?
- 

[SLIDE 5: The Infrastructure Price Tag]

### Point 3: The Unfunded Infrastructure Burden

Finally, let's talk about the bill. The City's own 2009 Stormwater Master Plan documented a capital improvement backlog of \$25.9 million. That deficit hasn't gone away; it has likely grown with inflation.

We have calculated the specific costs to bring utilities just to the Golf Lane tax lot. These are costs that do not currently exist in the City budget. When you add the other annexation lots the price tag increases. If I can bring your attention to the slide concerning Future Improvements it shows 9.7 million, those improvements only pertain to the knowledge the City had when they drafted the Capitol Improvement plan. It only takes into account the Oriole conceptual plan. It is the intent of the City that the developer pays for these constraints, lets just say that is doubtful.

We are facing over \$44 million in Golf Ln development infrastructure "needs" and backlogs.

SLIDE 6 [StormWater Needs]

Looking at the slide we have the preserved wetlands with 4 future onsite detention basins with 1 regional detention site and only the regional detention site is projected for funded. The annexation of golf ln, 21 acres, and golf club rd, 59 acres adds a total of 80 acres of new impervious surface to the Mill Creek Basin, which is a flood-prone basin.

The need for 4 onsite detention basins and one Regional Detention Basin along mill creek needs to be built prior to any more development of land that affects the mill creek basin. The cost for the Regional detention is \$600,000 that is in the budget for future improvements but the 4 detention basins are not in the budget. An item to note is the Regional Detention basin is projected to be built on top of 4 current houses so that land

would need to be purchased adding additional costs. To develop this acreage prior to fixing the \$26 million backlog is negligent.

- The need for a new Booster Station for the golf lane development causes The developer not to build without it. If they don't pay the full \$2.5 million, the ratepayers are on the hook.
- As it pertains to The Transportation Realignment and Collector: We already have safety issues at the intersection. We cannot wait for a fatality to prove this intersection is dangerous. Adding 74 homes to an intersection that already requires a \$3.3 million safety realignment is gambling with public safety. Also, the 8.2 million Golf Lane Collector must be built to allow for a second exit for the proposed sub division at Golf Ln.

[Slide 7]

The Whitney Road, Village Creek Development in 2002 and the Phillips Estate in 2014 show piping for the stormwater drain off into Mill Creek that has caused flooding to residents north of mill creek along Golf Ln, the Santiam golf course and the Farm lands to the south of Mill Creek. This occurs once to twice a year. These are facts that the 5 detention basins along Mill Creek must be completed now and especially prior to future developments that adds more stormwater.

[Slide 8]

It is understandable that the City needs to raise money and to do this they would need to tax household or business. The more households and businesses you have the more money you can receive.

We crunched the numbers for every single one of the 718 proposed units on this list—from Golf Club Road to Park Lane. If we build all of them, they will generate about \$459,000 a year for the City's general fund. Against a \$44 million infrastructure deficit, that revenue is a drop in the bucket.

If you look at the math for Shaff Road vs. Golf Club Road. High Density housing brings 100 more families but generates \$20,000 less revenue. We are importing more cost (traffic/police) for less money. We lose on volume.

It would take 96 years of tax revenue from these new homes just to pay off the infrastructure bill they are adding to. And that assumes we spend zero dollars on police, parks, or road repairs for these 718 families for the next century.

Since we obviously have to provide services, the actual payoff date is never. Approving these developments isn't 'growth'; it is a permanent transfer of debt onto the backs of existing Stayton residents." I would like to point out my previous statement of the housing shuffle that does not bring in population it just moves it around, thereby really never adding more revenue.

[Slide 9]

Finally, we must look at our schools. Based upon a hope population growth that may actual occurs, We calculated the impact of these 718 units on the North Santiam School District.

Conservatively, these developments will bring over 200 new students into our system. That is not just a number; that is 8 to 10 full classrooms of children. Stayton High and our elementary schools will have to find space for them immediately.

But here is the financial reality: It costs about \$11,600 a year to educate one student in our district. But the property taxes from these new apartments and homes only contribute about \$2,500 per student toward that bill.

That creates an annual deficit of nearly \$2 million. Who fills that gap? We will either face larger class sizes, fewer teachers, or—inevitably—another school bond measure on our property tax bill to build the new classrooms these developers would not pay for.

Let's me be clear about the capacity crisis. Right now, Stayton High School and Middle School are officially operating 'close to capacity.' They are the pinch points. They have almost no flexibility left.

While the Elementary school has a small amount of room today, these 718 new households will erase that buffer immediately.

We can't just add a classroom here or there forever. The district has projected that once we hit 2,600 students system-wide, we hit a 'cliff.' At that point, we cannot just add portables. We will need a bond measure to build an entirely new Elementary School to relieve the pressure on the whole system.

Commissioners, based on the evidence presented tonight, I ask you to find that these applications fail to meet the burden of proof required by Stayton Municipal Code Title 17.

First, the application fails Criterion A: The Need for Land. The City's determination of "need" is based on a 2013 projection of 1.7% annual growth. We have proven that

actual growth is less than half that rate only 0.8 percent. We currently have a housing surplus of 269 units relative to our population. We are not facing a housing shortage; we are facing a population shortage relative to our aggressive zoning. Approving 119 acres of new residential land when we cannot fill the homes we already have is not planning; it is speculation.

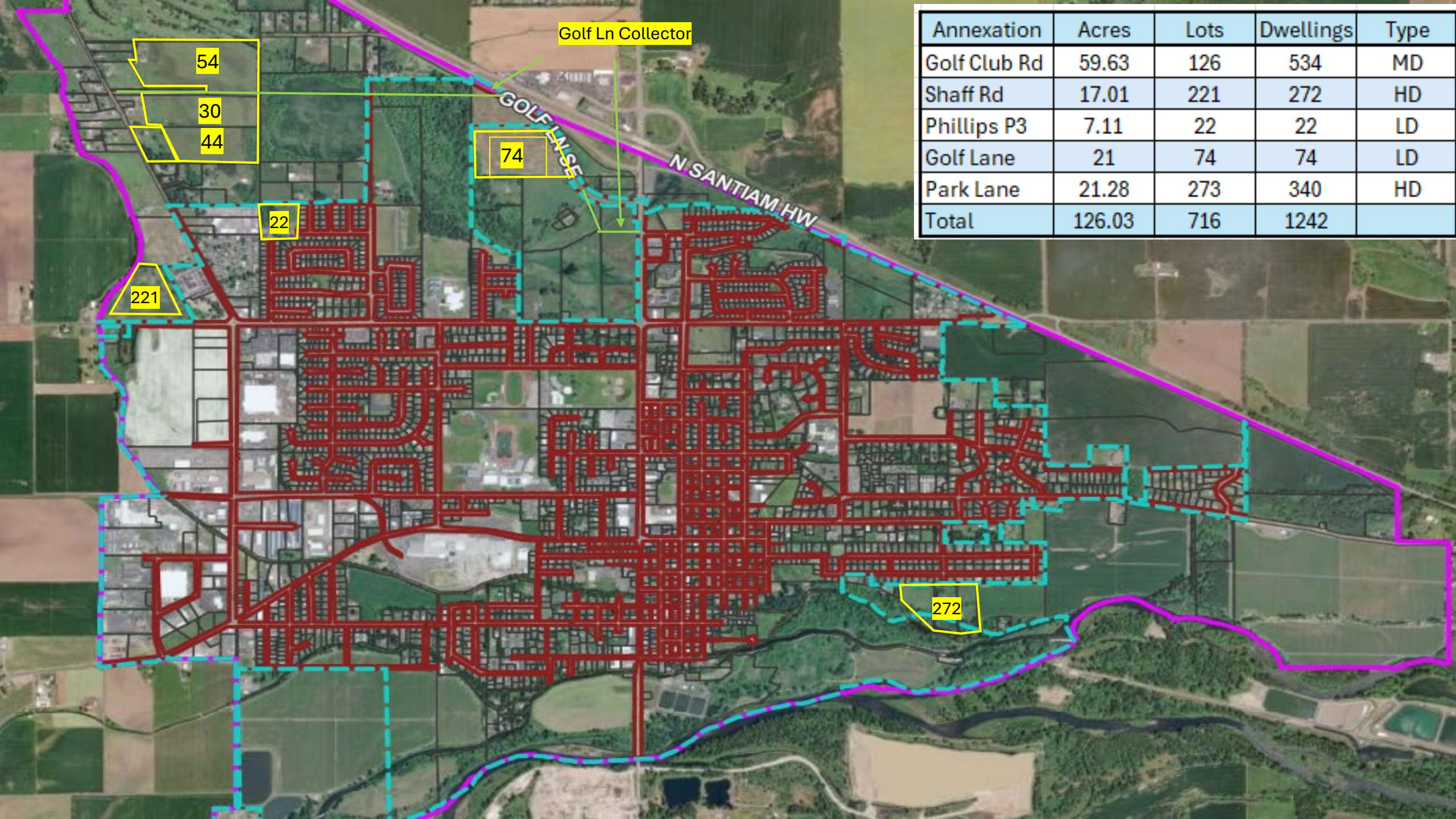
Second, the application fails Criterion C: Adequate Public Services. A service is not "adequate" if it bankrupts the provider.

- Infrastructure: We cannot claim to have adequate services when we have a \$26 million stormwater backlog and a total infrastructure deficit of \$44 million.
- Business & Economy: We cannot claim to be building a balanced community when we have had zero net business growth in a decade. We are building bedrooms without jobs, forcing 82% of our workforce to commute and spend their tax dollars in surrounding communities, cementing our status as a "Bedroom Community" and a drain on the budget.
- Schools: We cannot claim to be serviceable when these developments will create a \$1.9 million annual deficit for our school district and push us toward a capacity cliff that triggers an unfunded new elementary school.
- Fiscal Solvency: We cannot call this development "sustainable" when it takes 96 years of tax revenue just to pay off the infrastructure bill it creates.
- Finally, we must respect the financial reality of our citizens. In November, voters soundly **rejected the \$1.10 local option levy** because they are already tapped out. Yet, the City is reportedly looking to place this tax increase back on the next ballot.
- Approving these annexations guarantees that those taxes *will* have to go up again. It forces existing residents to subsidize the infrastructure for new subdivisions that do not pay for themselves and or not needed.
- We have a documented history of stagnation because we have failed to fix our infrastructure barriers. Let's finish the "to-do" list from our 2019 Economic Plan—fix the roundabout, fix the pipes, and attract jobs—*before* we ask the taxpayers to subsidize another subdivision.
- For the sake of Stayton's fiscal future, I urge you to **DENY** not only the Golf Lane annexation but the Golf Club Rd, Shaff Rd and Park Lane annexations.

Thank you.

## **Annexation Requirements**

- A: **Need**, The city is low on Buildable Lands.
- B: **Contiguity**, The land touches city limits (no islands), Consistent with Cities Comprehensive Plan.
- C: **Serviceable**, Water, Sewer, Stormwater and runoff, Transportation, Financial impact (SDCs and taxes will cover the cost of the new infrastructure)
- D: **Safety**, Public Health/Traffic
- E: **Natural Hazards**.



Golf Ln Collector

GOLF LN SE

N SANTIAM HW

Annexation	Acres	Lots	Dwellings	Type
Golf Club Rd	59.63	126	534	MD
Shaff Rd	17.01	221	272	HD
Phillips P3	7.11	22	22	LD
Golf Lane	21	74	74	LD
Park Lane	21.28	273	340	HD
<b>Total</b>	<b>126.03</b>	<b>716</b>	<b>1242</b>	

54

30

44

74

22

221

272

Table 2 — Housing Inventory Alignment

Year	Plan-Assumed Housing Units	Actual / Estimated Population	Population-Based Housing Need (Population ÷ 2.7)	Actual / Estimated Housing Units	Surplus / (Deficit) vs. Population Need	Remarks
~2010 (Plan baseline)	3,056	~8,244	~3,053	~3,060	+7	Baseline alignment
2020	~3,700	Actual 8,244 Estimated 9,778	~3,053	~3,350	+297	Adequate supply relative to actual population
2024	~4,050	Actual 8,520 Estimated 10,900	~3,156	~3,425	+269	Housing growth ahead of population demand
2030 (Projected)	4,337	1.6% growth 9,376 Estimated 11,359	1.6% growth 3,472 Estimated ~4,207	TBD	TBD	Requires population growth not yet observed

Key Finding:

Housing inventory has increased despite slower population growth, resulting in higher units-per-capita, not a shortage condition.

Outdated projections show 1,281 unit needed by 2030. Actual Reality we only need 465 Units

Based on the "Economic Development Strategy" (2019) and updated Census/State employment data (2023–2024), the following chart illustrates the business and commuter trends in Stayton since 2010. Stayton Business & Commuter Trends (2010–2024)

<b>Metric</b>	<b>2012–2015 (Baseline from Plan)</b>	<b>2023–2024 (Current Data)</b>	<b>Net Change</b>
<b>Total Employer Businesses</b>	<b>169</b> (2012 Est.)	<b>171</b> (2022 Census)	<b>+2</b> (Stagnant)
<b>Total Jobs Located in Stayton</b>	<b>3,150</b> (2015)	<b>~3,350</b> (Est. 2023)	<b>+200</b> (Slow Growth)
<b>Employed Residents (Labor Force)</b>	<b>3,176</b> (2013)	<b>3,823</b> (2023)	<b>+647</b> (Workforce Growing)
<b>Commuter: Live &amp; Work in Stayton</b>	<b>630</b> (19.8% of workforce)	<b>~688</b> (18% of workforce)*	<b>Flat / % Decline</b>
<b>Commuter: Live Here, Work OUT</b>	<b>2,870</b> (Out-Commuters)	<b>3,135+</b> (Est.)	<b>Increased Out-Flow</b>
<b>Commuter: Live Out, Work HERE</b>	<b>2,520</b> (In-Commuters)	<b>2,662+</b> (Est.)	<b>Increased In-Flow</b>

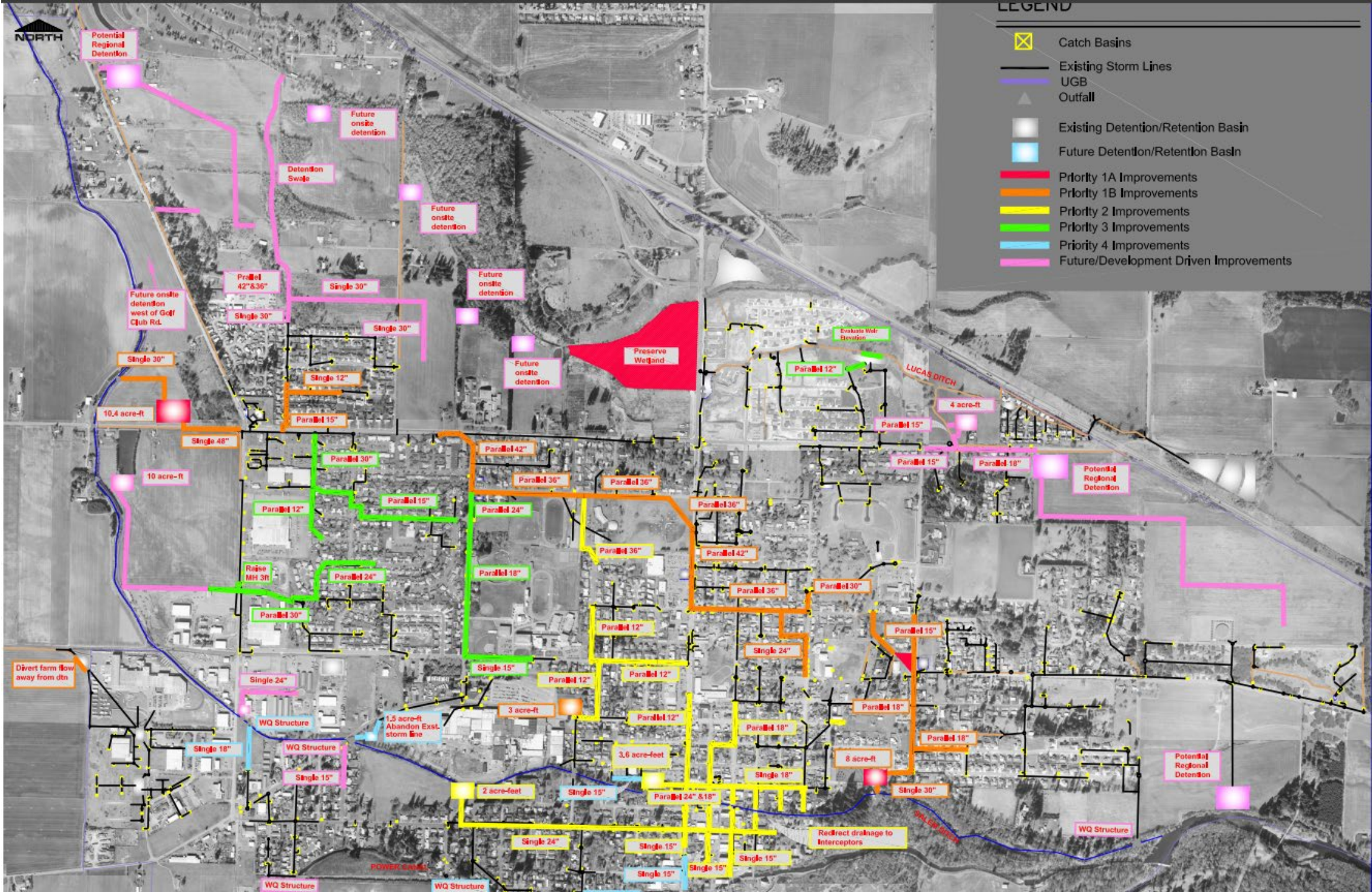
## Estimated Costs to add Golf Ln/Golf Club Rd

Infrastructure Item	Details	Estimated Cost
Stormwater System Deficit	City-wide Backlog (2009 Master Plan)	\$26,000,000+
Golf Ln Water Main Extension	~1,500 ft of 12" main @ \$350/ft	\$525,000
Golf Ln Sewer Main Extension	~2,000 ft to connect @ \$400/ft	\$800,000
Mill Creek Booster Station	Required for Upper Pressure Zone	\$1,500,000 - \$2,500,000
Golf Lane Collector Road	Future TSP Project	\$8,200,000
Golf Lane Realignment	Safety requirement at Whitney St	\$3,320,000
Sewer Capacity Fixes	Gardner Station Removal (Required)	\$4,170,000
Golf Club Water Main Extension	~1,000 ft of 12" main @ \$350/ft	\$350,000
Golf Club Sewer Extension	~500 ft of 12" main @ \$400/ft	\$200,000
<b>TOTAL "Backbone" Costs</b>	Mill Creek Specific + Stormwater Backlog	~\$45,050,000+

Prioritization	Conceptual Level Opinion of Probable Cost*
Priority 1A Improvements	\$3.6M
Priority 1B Improvements	\$5.0M
Priority 2 Improvements	\$5.0M
Priority 3 Improvements	\$2.2M
Priority 4 Improvements	\$0.5M
Future Improvements**	\$9.7M
<b>Rounded Total</b>	<b>\$26M</b>

\* All costs in 2007 Dollars and include engineering and contingencies.

\*\* Timing depends on when growth occurs.



- LEGEND**
- Catch Basins
  - Existing Storm Lines
  - UGB
  - Outfall
  - Existing Detention/Retention Basin
  - Future Detention/Retention Basin
  - Priority 1A Improvements
  - Priority 1B Improvements
  - Priority 2 Improvements
  - Priority 3 Improvements
  - Priority 4 Improvements
  - Future/Development Driven Improvements

# 100 Year Flood Plan updated May 2006

FEMA's National Flood Hazard Layer (NFHL) Viewer with Web AppBuilder for ArcGIS

Find address or place

FF = Salem Ditch  
 FH = Golf Club Bridge  
 FP = Cascade Hwy Bridge  
 FJ = Appr Design Runnoff

Mill Creek Gauge / Location	2000 FIS Flow	2003 FIS Flow	2019 FIS Flow	Total Added CFS
Penitentiary Annex (100-Yr)	10,200 cfs	10,200 cfs	10,200 cfs	No Change
Stayton Area (Section FJ)	4,000 cfs	4,000 cfs	3,355 cfs	-645 cfs
Golf Club Road (Section FH)	1,360 cfs	1,360 cfs	1,360 cfs	No Change

41047C0708G eff. 1/19/2000

41047C0725G eff. 1/19/2000

LOMR 03-10-0442P eff. 5/11/2006

LIMIT OF STUDY

41047C0716G eff. 1/19/2000

41047C0725G eff. 1/19/2000

Lower Salem Ditch - Overview - Trend

Level (ft) 4.00 3.60 3.20 2.80 2.40 2.00 1.60 1.20 0.80 0.40 0.00

Flow (CFS) 150.0 135.0 120.0 105.0 90.0 75.0 60.0 45.0 30.0 15.0 0.0

01 Jul 2025 01 Jan 2026

Trace: Upstream Level, Flow

Ruler Value

Latest Value: 3/13/2026 12:41:21.4, 3/13/2026 12:41:22.2

0.2mi

-122.828, 44.823 Degrees

POWERED BY esri

USDA, USGS The National Map, Orthoimagery, Data refreshed June 2024

Table 6: Pre to Post summary table without flow control

Storm Event	Allowable Runoff (cfs)	North Area Undetained Flowrate (cfs)	South Area Undetained Flowrate (cfs)	TOTAL Undetained Flowrate (cfs)
2 year	0.75	4.72	7.8	12.52
5 year	1.03	5.72	9.45	15.17
10 year	1.03	6.82	11.24	18.06
25 year	2.55	8.15	13.38	21.53
50 year	3.77	9.55	15.61	25.16
100 year	4.03	9.83	16.06	25.89

### Hydrograph Results

Below are the results of the hydrograph analysis for both pond facilities.

Table 9: Pre to Post Flowrate Summary with Detention/flow control

Storm Event	North Pond		South Pond		TOTAL Design Runoff (cfs)	Allowable Runoff (cfs)	Design < Allowable?
	Release Rate (cfsf)	Water Surface Elevation	Release Rate (cfs)	Water Surface Elevation			
2 year	0.22	417.32	0.47	416.17	0.70	0.75	YES
5 year	0.31	417.77	0.66	416.72	0.96	1.03	YES
10 year	0.37	418.23	0.82	417.21	1.53	1.54	YES
25 year	0.58	418.67	0.95	417.72	1.54	1.54	YES
50 year	0.96	418.95	1.85	417.96	2.77	3.77	YES
100 year	1.03	418.98	1.99	417.99	2.97	4.03	YES

## Detailed Tax Revenue Breakdown

Development	Type	Dwellings	Est. Market Value	Taxable Value (AV)*	City Tax / Yr (Per Dwelling)**	Total City Revenue / Yr
Golf Club Rd	MD	534	\$533,000	~\$255,840	\$995	<b>**\$531,330**</b>
Shaff Rd	HD	272	\$300,000	~\$123,000	\$478	<b>**\$130,016**</b>
Phillips P3	LD	22	\$533,000	~\$255,840	\$995	<b>**\$21,890**</b>
Golf Lane	LD	74	\$533,000	~\$255,840	\$995	<b>**\$73,630**</b>
Park Lane	HD	340	\$300,000	~\$123,000	\$478	<b>**\$162,520**</b>
<b>TOTALS</b>	--	<b>1,242</b>	--	--	--	<b>\$919,386 / yr</b>

*\*Note: Taxable Assessed Value is calculated using Marion County's Changed Property Ratio (CPR) of ~0.48 for Residential and ~0.41 for Multi-Family. You do not pay taxes on full market value.*

*\*\*Note: City Tax is based on the Permanent Rate (\$3.328) + Library Levy (\$0.56) = \$3.888 per \$1,000 AV. This excludes schools/county taxes which do not go to the City budget.*

## The "Unfunded Student" Gap

Based on standard student generation rates (0.45 for homes / 0.22 for apartments), these 1,242 units will add approximately **295 new students** to the district. Current Students 2,200 plus 295 is **2,495**. Cap for a mandatory new elementary school is 2,600.

School Level	New Students	Est. Classrooms Needed (25:1)
Elementary (K-5)	~140	5-6 New Classrooms
Middle (6-8)	~70	3 New Classrooms
High School (9-12)	~85	3-4 New Classrooms
<b>TOTAL</b>	<b>295 Students</b>	<b>11-12 New Classrooms</b>

## Financial Deficit Annual

Cost to Educate: Approximately \$11,634 per student (State/District Avg) Total Annual Cost: \$3,432,030

School Tax Revenue Generated: Approximately \$1,064,000 (Est. @\$4.50/\$1k AV)  
Annual Deficit **negative \$2,368,030**

QUESTIONS



# **Oregon Housing Needs Analysis 2026 Production Targets and Adopted Methodology**

**December 2025**

## Oregon Housing Needs Analysis 2026 Production Targets and Adopted Methodology

This report is produced by the Office of Economic Analysis within the Department of Administrative Services. The Oregon Department of Housing and Community Services (OHCS) and the Oregon Department of Land Conservation and Development (DLCD) provided key contributions. Specific staff include:

### **Office of Economic Analysis**

- Carl Riccadonna, Chief Economist
- Jordan Macias, Economist
- Mitchell D'Sa, Economist

### **Housing and Community Services Department**

- Megan Bolton, Assistant Director of Research
- Love Jonson, Affordable Housing Operations and Policy Analyst
- Brandon Schrader, Housing Economist
- Elise Cordle Kennedy, (former) Senior Research Analyst

### **Consultants:**

#### **ECONorthwest**

- Michael Wilkerson, Director of Economic Research
- Lorelei Juntunen, Project Director
- Justin Sherrill, Senior Technical Manager
- Madeline Miller, Senior Project Manager
- Becky Hewitt, Senior Policy Advisor

#### **Portland State University Homelessness Research and Action Collaborative**

- Marisa A. Zapata, Director, Portland State University
- Franklin Spurbeck, Senior Research Assistant, Portland State University

### **Department of Land Conservation and Development**

- Ethan Stuckmayer, Housing Division Manager
- Jena Hughes, Housing and Growth Management Analyst
- Sean Edging, Senior Housing Planner
- Mari Valencia-Aguilar, Senior Housing Planner
- Celestina Teva, Housing Planner
- Thea Chroman, Housing Planner
- Karen Guillen-Chapman, Urban Growth Boundary Specialist
- Kelly Reid, Portland Metro Area Regional Representative
- Laura Kelly, Portland Metro Area Regional Representative

<http://oregon.gov/DAS/OEA>  
<http://oregoneconomicanalysis.com>  
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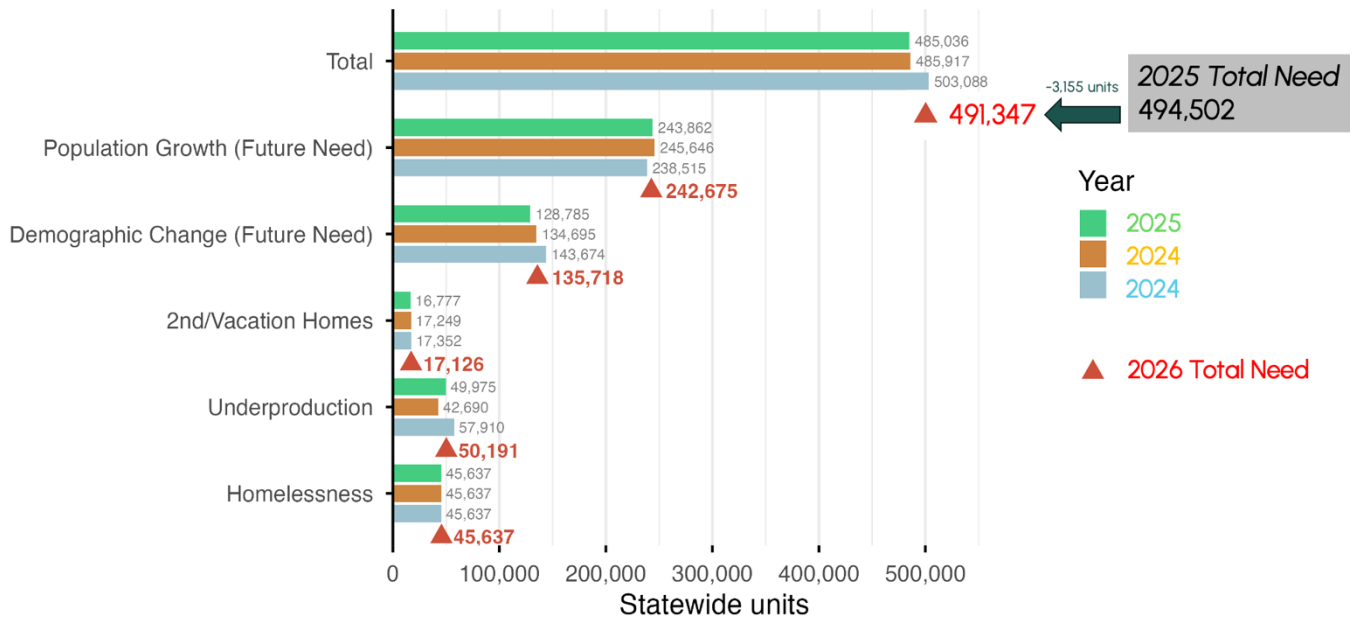
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**Report Overview**

This report contains the 2026 statewide and local housing production targets along with a description of the OHNA Methodology. Due to the federal government shutdown in October and November of 2025, many of the foundational data sources used in the methodology were delayed from their typical release schedule. Additionally, some of the sources (primarily used in the local allocation methodology) have infrequent and unannounced release dates, making it not always possible to update the data sources from the last annual report. These data limitations will be documented in detail. Other than data update limitations, the only planned update to the methodology involved a change from a two year to a three year moving average of the annual need to create the 2026 20-year total need and the annual production target.

**Figure 1. OHNA Statewide Annual Targets by Component**



**Figure 2. OHNA Statewide 2025 vs 2026 Production Target**

**2025 Production Target**

Future Need over 20 years = 19,928

Current Need over 10 years = 9,594

Production Target = 29,522

**2026 Production Target**

Future Need over 20 years = 19,776

Current Need over 10 years = 9,583

Production Target = 29,359



**-169 Units**

## Oregon Housing Needs Analysis Methodology

The OHNA Methodology focuses on the affordability and geographic distribution of newly produced housing, not the characteristics of the existing housing stock across the state. This is a methodological choice that has implications for policymaking and tracking the overall affordability of the entire housing stock. The Final Methodology incorporates multiple considerations to reflect different types of demand on current and future housing need. The OHNA Methodology has six steps:

1. Determine Regions
2. Determine Income Categories
3. Determine Components of Housing Need
4. Allocate Needed Housing to Income Categories
5. Allocate Needed Housing to Cities and UGBs
6. Set Housing Production Targets

### Step 1: Determine Regions

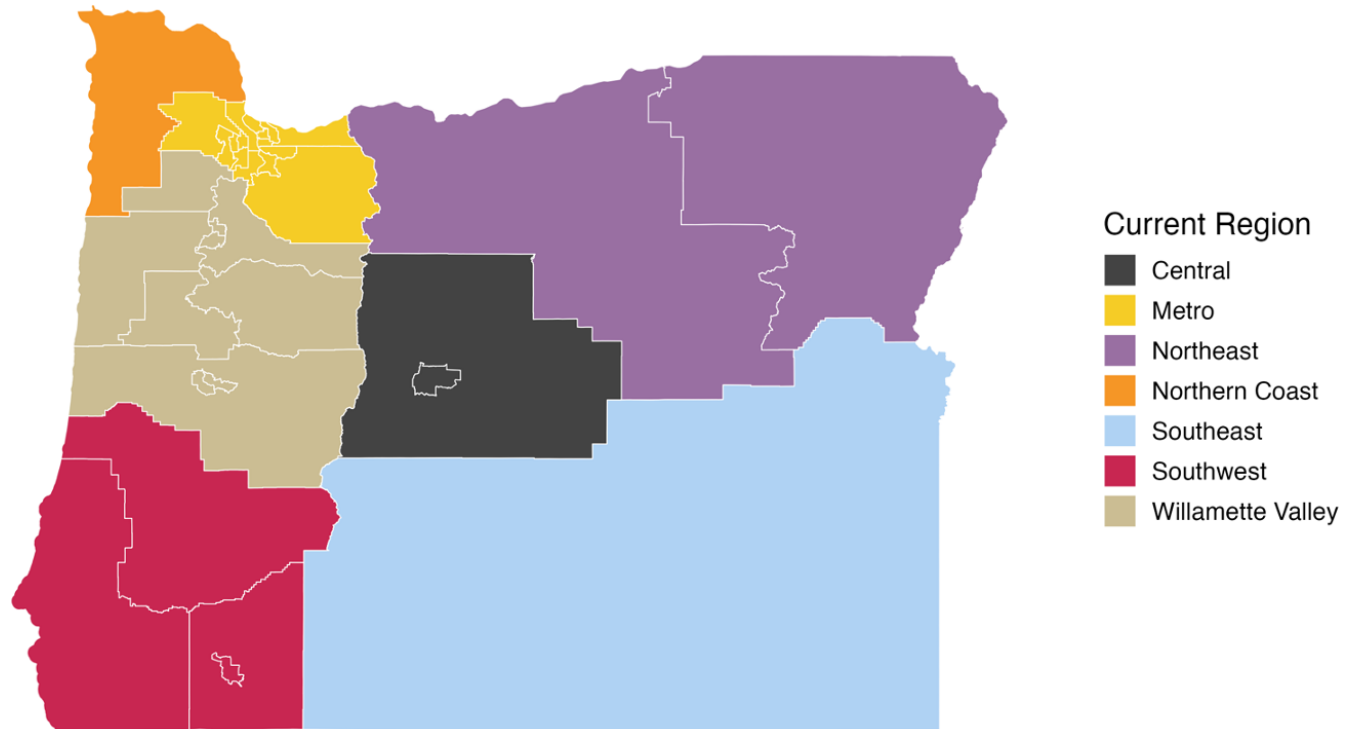
The first step in completing the OHNA is to define the regions for the analysis. The regions affect the entire analysis, from the ability to develop the analysis based on available data to the interpretation of the findings about regional housing needs for individual cities. Since each possible dataset that could be used to define regions has its own level of geographic specificity, choices about regions are integrally tied to choices about data.

Defining regions for this analysis required identifying the source of data that would be used throughout the analysis. The source of data needs to be consistently available statewide, available at an appropriate geographic level, updated annually, have acceptable margins of error for the variables of interest for the methodology, and be flexible enough to allow for comparisons necessary to deliver the analysis required by the statute. While the methodology is structured to account for limitations in available data, future iterations of the methodology could benefit from improvements in state access to data sources, such as a statewide parcel database of standardized assessor's data or a statewide rental registry that included information on costs and accessibility.

#### *Regions*

Figure 1 shows the regions in the OHNA Final Methodology. The OHNA regions are built from Census Public Use Microdata Areas (PUMA) regions using data from the 2022 vintage of data. PUMA regions shown in white outline, are aggregated up to the OHNA regions, shown in color. The U.S. Census Bureau updates PUMAs every 10 years following the Decennial Census; future changes to PUMA boundaries may affect the OHNA regions in the future.

**Figure 3. OHNA Regions (PUMA boundaries denoted in white)**



## Step 2: Determine Income Categories

The second step is to define the income categories that are used to distribute needed housing across the income spectrum. The OHNA Methodology uses Area Median Income (AMI) limits that were stated in ORS 184.453(4):

- (a) Less than 30%
- (b) 30% or more and less than 60%
- (c) 60% or more and less than 80%
- (d) 80% or more and less than 120%
- (e) 120% or more

These income categories align with common funding sources, including OHCS's programs, for subsidized affordable housing. It's important to note that the distribution of households in each income category is not equal.

The methodology uses regional incomes to allocate housing need to individual jurisdictions. This is an important change from prior Goal 10 planning requirements in which jurisdictions used their own city-level incomes to estimate housing need by income level. The effect of this change is that local governments will be required to plan for a share of the region's estimated housing needs by income, rather than locally estimating and planning for housing needs by income only within the boundaries of the local government.

## Oregon Housing Needs Analysis 2026 Production Targets and Adopted Methodology

Income categories translate into housing affordability. Income categories are expressed as a percent of AMI, which is determined by the U.S. Department of Housing and Urban Development (HUD) and takes into account household size and the number of bedrooms. A housing unit is determined to be affordable to a household if it accounts for less than 30% of that household's gross income.

Across the Final Methodology, all income categories are adjusted to account for household size. HUD provides regional AMIs based on a four-person household and provides guidance to allow practitioners to adjust for household size and number of bedrooms in a unit,<sup>1</sup> which is as follows:

### Household Size Income Adjustment

- 1-person household: 70% of AMI
- 2-person household: 80% of AMI
- 3-person household: 90% of AMI
- 4-person household: 100% of AMI
- 5-person household: 108% of AMI

### Apartment Unit Size Income Adjustment

- Studio unit: 70% of AMI
- 1-bedroom unit: 75% of AMI
- 2-bedroom unit: 90% of AMI
- 3-bedroom unit: 104% of AMI

## Step 3: Determine Components of Need

The third step of the OHNA is to determine the different components of housing need. The OHNA is an estimate of total housing needed statewide over a 20-year horizon and includes housing units that are needed now to house the existing population (Current Need) as well as units needed in the future to accommodate household growth (Future Need).

- **Current Need** includes housing underproduction and housing units for people experiencing homelessness.
- **Future Need** includes units for expected population growth, expected housing units that will be lost to second and vacation homes, and units to accommodate expected demographic change.

By including an estimate of current housing need in planning requirements, the OHNA departs from historic Goal 10 planning requirements which only required jurisdictions to look forward at the 20-year population forecast. The Final Methodology recognizes that Oregon has been underbuilding housing for several decades and that a narrow focus solely on future population

---

<sup>1</sup> Portland Housing Bureau Median Income Percentages 2024. <https://www.portland.gov/phb/documents/2024-income-and-rent-limits-phb/download>

growth will not help communities relieve the pressures created in housing markets by low vacancy rates and high prices.

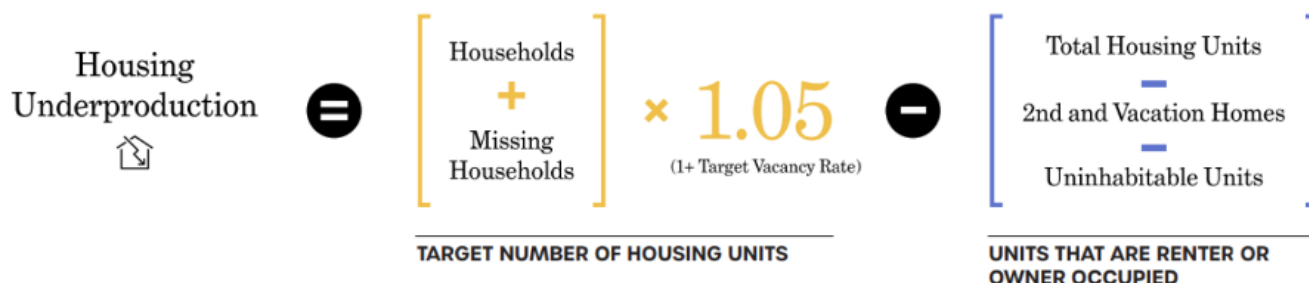
*Current Need*

The OHNA is an estimate of total housing needed statewide over a 20-year planning horizon, including an estimate of how many units the state, regions, and cities need currently to adequately house their existing populations. Current need takes into account housing underproduction and units needed for people experiencing homelessness.

**Housing Underproduction**

The Final Methodology adopts with some minor modifications of an approach used by Up for Growth, a housing policy research nonprofit in Washington, D.C., that has been vetted by housing industry experts.<sup>2</sup> This approach calculates the target number of housing units a region’s market should have (demand) and compares that against the actual number of units that market has available for year-round occupancy (supply). These steps are broken down below. Regions where the demand exceeds supply are experiencing housing underproduction.

**Figure 4. Up for Growth Housing Underproduction Methodology**



Target Number of Housing Units

The estimate of the target number of housing units starts with the Census Bureau’s estimate of total households and then estimates the number of “missing households” that have not formed in a market compared to historical formation rates in 2000.

Household formation is influenced by the housing stock available—when a market does not build sufficient housing, prices rise and vacancy falls, affecting the likelihood of households to form (e.g., roommates splitting up, children moving out, etc.). This measure estimates the number of households that are expected to form in less constrained housing market conditions, and as such are a component of current demand.

The Final Methodology calculates “missing households” based on changes in the headship rate (the percentage of people who are heads of households, or householders) for different

<sup>2</sup>Up for Growth, Housing Underproduction in the U.S. 2024. <https://upforgrowth.org/apply-the-vision/housing-underproduction-reports/>

## Oregon Housing Needs Analysis 2026 Production Targets and Adopted Methodology

age cohorts between 18 and 64. The lack of housing availability and affordability is not the only reason that explains reduced household formation rates, therefore including all age cohorts would be an overcount of household formation primarily caused by housing market constraints. Age cohorts are therefore limited to head of households between 18 and 64 as the most likely ages where this occurs—effectively excluding head of households over 65 is one way to limit the impact of the overcount. Limiting the age cohorts helps compensate for the nature of the overcount—essentially that housing isn't the only factor contributing to decreased household formation rates. The standard UFG approach limits age cohorts over the age of 44, the expansion of head of households to the age of 64 acknowledges circumstances unique to Oregon's housing market, and the fact that working households of all ages are experiencing the impacts of a constrained, underproduced housing market.

The OHNA Methodology uses a baseline headship rate in the year 2000 for all cohorts. This year was chosen because 2000 Decennial Census data offers the most recent statistically reliable estimate of a housing market that was more in balance. Headship rates were also generally stable between 1980 and 2000, so going back further would not have a large impact on the baseline headship rate. The Final Methodology compares the most recent headship rate (based on 2024 PUMS data) against the 2000 baseline for each age cohort. If a cohort has a lower headship rate in the most recent year compared to the baseline, it indicates that fewer households formed. The total estimate of "missing households" is the sum of reduced household formation from cohorts aged 64 years and younger. Should there be negative missing households (more households formed compared to the baseline rate) in any age cohort, they are netted out to zero because they are not contributing to excess demand beyond what is already captured in the households formed data observation.

The estimate of missing households is added to the current total number of households to approximate the total number of households that would be seeking housing in unconstrained market conditions. The model then applies a 5% target vacancy rate to estimate the total number of housing units a region should have to accommodate current need and have a healthy level of vacancy. Five percent vacancy is the 75th percentile of the national vacancy rate between 1980 and 2000 and is meant to represent unconstrained market conditions. It is backed by industry stakeholder outreach and research and is used in other methodologies of estimating housing need and underproduction.

### Actual Units Available for Year-Round Occupancy

The estimate of the actual number of units available for year-round occupancy starts with the Census Bureau's estimate of total housing units and removes uninhabitable units and second and vacation homes that are not available for year-round occupancy from the stock. Uninhabitable units are identified in the Census PUMS data as those that lack indoor plumbing and complete kitchens, and that have been vacant for at least a year. Second and vacation homes are identified in the Census Bureau as those that are vacant and used for "seasonal or recreational purposes."

By removing uninhabitable units and second and vacation homes from the estimate of the current housing stock, the Final Methodology attempts to calculate each region's total housing

stock available for year-round occupancy as a more accurate reflection of housing supply. When compared to the total number of households each region would have in unconstrained market conditions, the Final Methodology can capture current housing underproduction and incorporate current housing need into future planning purposes. This change pushes Oregon's statewide housing planning system toward one that more accurately measures total housing need; planning for future housing need without accounting for current need will continue to yield insufficient housing production relative to demand across the state.

### **Housing Units Needed for People Experiencing Homelessness**

DAS and OHCS engaged the Portland State University (PSU) Homeless Research and Action Collaborative (HRAC) to develop the methodology to estimate housing units needed for people experiencing homelessness. The HRAC methodology uses an annualized point in time count of unsheltered households, the number of households served in shelter over a year, and households doubled-up based on K-12 student data and U.S. Census data.

Determining the number of units a region needs to house people experiencing homelessness requires careful attention, because available datasets have many known limitations including undercounting populations. Populations experiencing homelessness are generally not captured in foundational datasets derived from the Census, so they are not included in the projections of current (or future) need. This methodological choice was made under the assumption that if jurisdictions can plan for current need as the sum of underproduction and housing for people experiencing homelessness, while planning for enough housing units to meet future need, then homelessness would become "functionally zero," and would be rare and brief.<sup>3</sup>

The Final Methodology relies heavily on the limited research available on this topic, as well as discussion and feedback from stakeholders with expertise in research and service provision for those experiencing homelessness in Oregon. The state continues to explore new research and better data to continually improve this portion of the OHNA methodology.<sup>4</sup>

The HRAC methodology combines portions of four data sets to better estimate the number of people experiencing homelessness in an OHNA region. The approach uses Continuum of Care (CoC) Point-In-Time Count (PITC) data and McKinney-Vento Student Data (MVSD) for children enrolled in K-12 public schools. It also utilizes CoC Homeless Management Information System (HMIS) data, By-Name Lists (BNL), and American Community Survey (ACS) data.

To calculate the number of households who need housing, the HRAC methodology combines:

- **Unsheltered data:** PITC unsheltered data that is annualized and converted to household numbers; or the household count from BNL across one year;

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<sup>3</sup> Functional Zero Homelessness occurs "when the number of people experiencing homelessness at any time does not exceed the community's proven record of housing at least that many people in a month."  
<https://community.solutions/built-for-zero/functional-zero>

<sup>4</sup> Recommendations for improving data are included in Chapter 7 of the OHCS RHNA Technical Report and Appendix B describes the key analytical issues in estimating the amount of housing need to accommodate the population of people experiencing homelessness in Oregon

## Oregon Housing Needs Analysis 2026 Production Targets and Adopted Methodology

- **Sheltered data:** Households served in shelter over one calendar year, as recorded in HMIS; and,
- **Doubled-up data:** MVSD for doubled-up student households plus ACS doubled-up households without children enrolled in K-12 schools.

All data are converted to households (HH), and annualized when the data set is not an annual count. Each household is assumed to occupy one housing unit, thereby producing the estimate of the number of housing units needed. See Appendix C for a copy of the complete memo detailing the HRAC methodology.

### *Future Need*

The OHNA is an estimate of total housing needed statewide over a 20-year planning horizon. Future need takes into account the housing units needed for population growth, housing units lost to second and vacation home demand, and housing units needed to accommodate demographic change.

### **Housing Units for Population Growth**

To estimate 20-year future housing needs, forecasted population growth must be translated into future households and then translated into future needed housing units.

PSU's Population Research Center (PRC) produces the official population estimates for the State of Oregon with the exception of the Portland Metro Region.<sup>5</sup> The Final Methodology converts the PRC population forecast to households using the most recent regional average household size estimated with the most recent PUMS data.

As with past Goal 10 housing planning requirements, the OHNA Methodology excludes the estimate of people living in group quarters because they are not considered part of the household population, and their needs are planned for separately. Each region's base-year population estimates are reduced by the 2023 PUMS-derived share of population in group quarters, before converting population to households. For the horizon year forecasts, the model uses 2024 PUMS to calculate a group quarters rate by age cohort and apply it to regions' 2045 age cohort forecasts to arrive at an overall regional group quarters rate. Since most regions' forecast a greater share of older cohorts in 2045, the OHNA currently models slight increases in overall group quarter rates for all regions in the horizon year.

The loss of units to second and vacation homes in the future is calculated as a separate component of need (see next section), therefore the Final Methodology assumes that each future household will occupy one housing unit, while also planning for the target vacancy rate. Once total future needed housing units are determined, the Final Methodology applies the

---

<sup>5</sup> Metro is responsible for issuing population forecasts within the Metro urban growth boundary, which serve as the basis for comprehensive and land use plans (see ORS 195.036). The Metro allocation methodology, outlined later in this document, is based on housing needs estimates for the Metro UGB in Metro's Urban Growth Report.

same 5% vacancy factor to estimate the future housing stock that cities and regions should plan for (see page 6).

### **Housing Units Lost to Second and Vacation Home Demand**

Estimating second and vacation homes as its own component allows cities to better account for demand for these housing units in the future and improves the State's understanding of the role that second and vacation homes play in each region's housing market. In many outdoor recreation- and tourist-heavy communities, particularly along the coast, in the Gorge, and in central Oregon, the presence of second and vacation homes removes units of the existing housing stock from year-round occupants at a different rate than in other parts of the state. This contributes to underproduction of needed housing by reducing the number of units available to full-time renters and owners, thereby decreasing vacancy rates and putting upward pressure on housing costs. As the stock of second and vacation homes grows in the future, it effectively takes away from housing production, as fewer units are available for year-round occupancy.

#### Summary of Process to Identify Second and Vacation Homes

1. Calculate change in the number of second and vacation homes per region
2. Determine how much housing is needed to offset this expected future loss in units
3. Apply the ratio to forecasted housing unit growth

The current share of second and vacation homes varies by region, as does the pace at which these shares are changing over time. First, the model calculates the change in the number of second and vacation homes for each region between the years 2000 and 2020. The growth in second and vacation homes is then contextualized by the number of all housing units added for each region between 2000 and 2020. The ratio of second and vacation homes added compared to the total housing production is calculated for each region. This ratio is effectively an approximation of how much additional production would be required to offset the loss in units to second and vacation home demand over the 20-year planning period. In practice, a jurisdiction could implement policies to reduce the growth of second and vacation homes or target the production of additional units to offset the loss of units available for year-round occupancy.

#### **Example Calculation for Second and Vacation Home Demand**

If a city produced 1,000 housing units between 2000 and 2020 but saw the number of second and vacation homes in the same time period grow from 100 to 200 units (either through new construction or conversion of an existing home), then it would have a ratio of 0.1  $((200-100)/1000)$ . If this city was expected to grow by 2,500 households over twenty years, the additional production to account for units lost to second and vacation home need would be  $0.1 * 2,500$  or 250 units.

## Oregon Housing Needs Analysis 2026 Production Targets and Adopted Methodology

The Final Methodology only calculates second and vacation homes as part of determining future housing need. These units are no longer available for year-round occupancy, and as units are purpose-built or converted into second and vacation homes, the progress toward the desired number of units per household or target vacancy rate is lessened. Units identified as being currently occupied as second and vacation homes are captured as part of the underproduction calculation (current need).

### Housing Units for Demographic Change

The number of housing units needed to account for demographic change helps to account for changing household demographic composition as the population of Oregon changes.

Like many states, Oregon is aging, and seniors typically have smaller household sizes; according to Census data, the average household size (persons per household, PPH) headed by a person aged 60 to 69 is only 1.9 people, compared to 2.9 people for households headed by a person aged 30-39. As population forecasts expect a larger share of the population to be 65 and older, and as the fertility rate continues to remain below replacement rate, more housing units will be needed to house Oregon's older total future population. An example below depicts how demographic change is handled in the model.

First, the Final Methodology uses PUMS data to calculate the current PPH for each major age cohort by region. It then joins the age cohort-based PPH figures to the 2025 and 2045 population forecasts by age cohort and then calculates a total PPH for each region for 2025 and 2045. Average household sizes for each region are forecast to be smaller due to changing demographics.

The PRC-forecasted populations in each region in 2025 and 2045 are then converted into households by dividing by the average household size in each region. This differs from the population change component, where the PPH is held constant between the baseline and horizon years (using 2025 PPH).

The final step in the process is to convert the added number of households in each region into needed housing units. Following the methodology for the other components, the Final Methodology also applies the target 5% vacancy factor to the estimated number of needed housing units in the future (see page 6).

#### Example Regional Demographic Change

1.  $(\text{Population}_{2045} \div \text{PPH}_{2025}) - (\text{Population}_{2025} \div \text{PPH}_{2025}) = \text{Households added by Population Change}$
2.  $(\text{Population}_{2045} \div \text{PPH}_{2045}) - (\text{Population}_{2025} \div \text{PPH}_{2025}) - \text{Households added by Population Change} = \text{Households added by Demographic Change}$

3. Households added by Demographic Change x 1.05 = Housing Units Needed to Account for Demographic Change

The demographic change component is effectively capturing the change in household size for existing households (starting in 2025) as well as the marginal new households added between 2025 and 2045. This is a deviation from other components in that it considers housing need for existing and future households. It is included in the future need category because it captures future demand for housing from existing households (rather than underproduction and homelessness, which are current demand).

#### **Step 4: Allocate Needed Housing to Income Categories**

Once total housing units needed are estimated for each component and each region, the next step is to distribute housing need to income categories. Allocation processes differ by component.

##### *Current Need: Housing Underproduction*

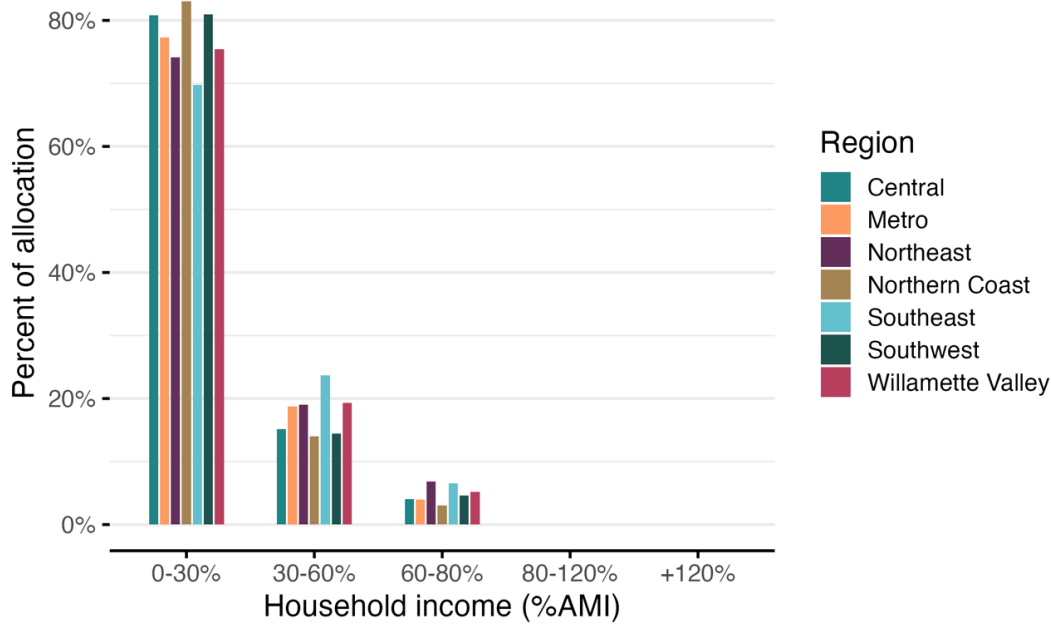
Underproduced units are allocated to income categories based on the rate of cost burdened renter households in each region. Cost burdening is a good proxy to estimate the income levels where current housing is in most need. Underproduction in a market leads to increased cost burdening by limiting choice and reducing overall affordability, and these impacts are most acutely experienced by lower-income renter households who have the highest rates of cost burdening. Underproduced units are therefore distributed proportionate to rates of regional cost burdening to approximate the income levels with the most acute need. For example, if 50% of all renter households who are cost burdened earn 0-30% of AMI, then 50% of the underproduction units should be targeted for households earning 0-30% of AMI. The model uses 2024 PUMS to first isolate cost-burdened renter households in each region, and from there, calculate the proportion of these cost-burdened households in each AMI household income bracket.

##### *Current Need: Housing Units Needed for People Experiencing Homelessness*

Housing units needed for people experiencing homelessness are distributed by income based on information provided from OHCS. There is no existing, high-quality dataset with information about the incomes of people who are experiencing homelessness, but many households that are experiencing homelessness have incomes and still cannot find a home that is affordable to them.

The Final Methodology uses data on the incomes of people experiencing homelessness from HMIS information managed by Continuums of Care. The data are from 2024 and are regional. Statewide, of households whose incomes are captured in the data, a large portion (77%) are in the lowest income category of 0-30% AMI. The regional distributions by income are shown in Figure 5.

**Figure 5. Income Distributions for Each OHNA Region for People Experiencing Homelessness, 2025 (unchanged from 2024)**

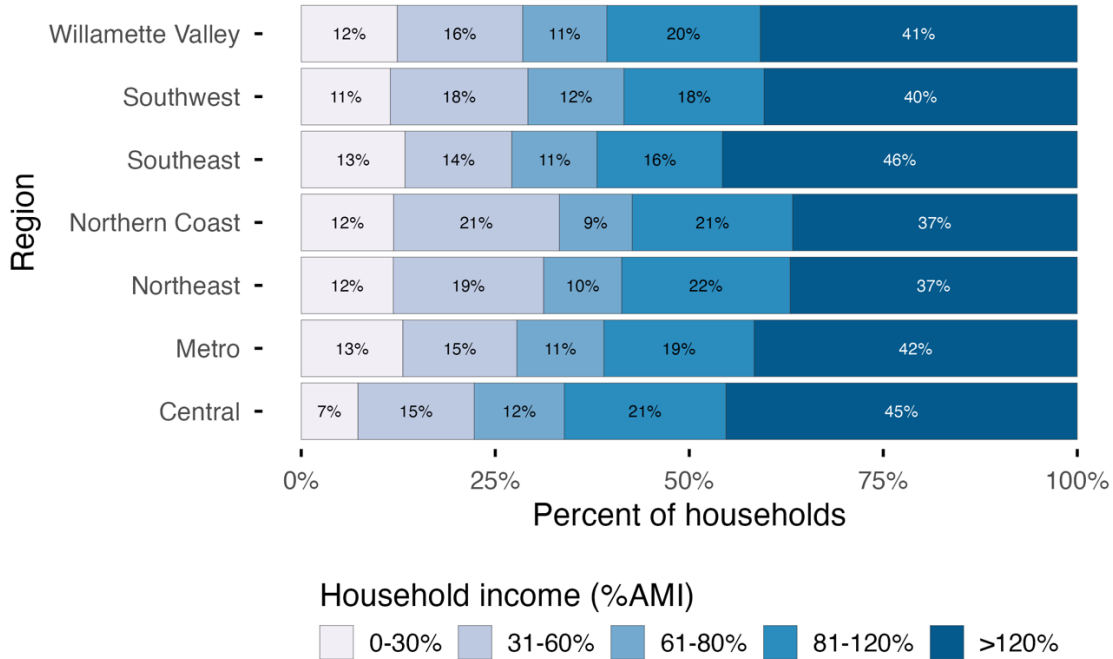


*Future Need: Housing Units for Population Growth*

Units needed to accommodate population growth are allocated based on each region’s current income distribution. The state’s income distribution and that of each region are shown in Figure 6 below.

**Figure 6. Income Distributions for Oregon and Each OHNA Region, 2025**

## Oregon Housing Needs Analysis 2026 Production Targets and Adopted Methodology



### *Future Need: Housing Units Lost to Second and Vacation Home Demand*

PUMS data does not provide rent or valuation data for units identified as second and vacation homes, but data on the year built are available and are used as a proxy for valuation with the assumption that newer units are more expensive and should be allocated to the highest income categories. The OHNA methodology allocates units identified as second and vacation homes that were built prior to 1990 to the 80-120% AMI income category while those built after 1990 are allocated to the 120%+ AMI income category. This distribution was determined based on a PUMS analysis of regional patterns of affordability of occupied homes by year built.

### *Future Need: Housing Units Needed for Demographic Change*

Given the similarities between units needed for population growth and units needed for demographic change, units needed for demographic changes are also allocated to income categories based on each region's income distribution.

## **Step 5: Allocate Needed Housing to Cities and UGBs**

After the total housing units needed over 20 years is calculated, the fifth step in the methodology is to determine what needed housing should be allocated to areas inside or outside of Urban Growth Boundaries. The Portland Metro region has a different allocation methodology (see page 20). While the Salem-Keizer area has two cities within one UGB, PRC provides city-level population projections for both Salem and Keizer, preventing the need to create a separate allocation process for this UGB.

### *Step A. Determine Regional Need Inside vs. Outside UGBs*

First, the 20-year future population growth outside of UGBs is determined for each region. This is based on PRC forecasts which report outside-UGB subtotals for every county. This step recognizes that not all Oregonians live inside UGBs, and not all Oregonians will live inside UGBs in the future. Lands outside a UGB receive a future housing estimate to reflect projected demand, but do not receive any current need allocations. Current need is a symptom of a lack of enough housing units within the planned areas of growth. Areas outside of UGBs are rural and resource lands and generally do not plan for housing growth under the statewide land use system; therefore, the responsibility for providing additional housing units to meet current need is accommodated inside of UGBs.

Second, units that accommodate population growth, demographic change, and demand for second and vacation homes outside UGBs are removed from the regional total. The remaining units are then allocated to UGBs inside the region.

### *Step B. Allocating Regional Need to Urban Growth Boundaries*

Next, each component of need is allocated from the adjusted regional total (excluding areas outside of UGBs) to each of the UGBs in the region using a set of policy variables and weights in the following combinations. ORS 184.453 requires the methodology to allocate housing need to each city in consideration of forecasted population growth, regional job distribution, and an equitable statewide distribution of housing. The allocation weights below operationalize this direction to align with the policy priorities set forth by the legislature, balancing where people currently live, where the PSU population forecasts expect people to live, and where the region's jobs are located. Second and vacation home allocations focus those housing units where the housing markets are most directly impacted today. Including an area's share of jobs as a weight in the allocation is a policy choice driven by Oregon's desire to create compact livable communities with access to jobs and amenities. Locating housing closer to jobs also helps support Oregon's climate and emissions reductions goals.

- **Housing Underproduction**
  - 50% from UGB's share of its region's current population
  - 50% from UGB's share of its region's current employment (derived from current Census Longitudinal Employer-Household Dynamics (LEHD) block-level counts of jobs within all geographies)
- **Housing Units for People Experiencing Homelessness**
  - 50% from UGB's share of its region's current population
  - 50% from UGB's share of its region's current employment
- **Housing Units for Population Growth**
  - 50% from UGB's share of its region's population growth
  - 50% from UGB's share of its region's current employment
- **Housing Units for Demographic Change**
  - 50% from UGB's share of its region's current population
  - 50% from UGB's share of its region's current employment
- **Housing Units Lost to Second and Vacation Home Demand**

## Oregon Housing Needs Analysis 2026 Production Targets and Adopted Methodology

- 100% from UGB's share of its regions current second and vacation home stock (as determined by 2020 Decennial Census block-level counts of second and vacation homes spatially joined to UGB boundaries)

### *Step C. Distribute from Urban Growth Boundaries to Cities*

This is only applicable in the Portland Metro UGB, which contains multiple jurisdictions (see page 20).

## **Step 6: Set Housing Production Targets**

Once the total housing need is determined, the final (sixth) step of the methodology is to set targets for housing production. In early 2023, Governor Tina Kotek issued [Executive Order 23-04](#) to establish an annual statewide housing production goal. Based on this policy objective and using the same formula as the Governor's housing production goal, the OHNA Final Methodology prioritizes and front-loads the current need over 10 years and spreads the future need over the 20-year OHNA planning horizon to calculate the annual production target. An example calculation of an annual production target is shown below using statewide total housing need. The same calculations apply for calculating the production targets for each city and each income level.

### **Example Annual Housing Production Target Calculation Using Statewide Results**

See page 24 more detail on the statewide results by component.

Total Need: 491,347 units  
Current Need: 95,828 units  
Future Need: 395,519 units

Annual Production Target:

$$\begin{aligned} & [\text{Current Need} / 10 \text{ years}] + [\text{Future Need} / 20 \text{ years}] \\ & [95,828 \text{ units} / 10 \text{ years}] + [395,519 \text{ units} / 20 \text{ years}] \\ & = 9,583 \text{ units} + 19,776 \text{ units} \\ & = \mathbf{29,359 \text{ units per year}} \end{aligned}$$

In order to produce annual targets for each jurisdiction that are more stable from year to year, DAS runs the OHNA Methodology each year and averages the current year's results with the prior two year's results. In the 2025 production targets, this wasn't possible due to the lack of 3 years of annual targets, therefore the 2026 annual production target is the first vintage where the 3 year moving average has been implemented. The intention with smoothing the data is to prevent OHNA targets from jumping around significantly from year to year due to data volatility, allowing local jurisdictions to have more consistent information for planning purposes. In this case the 2026 production target is the average of 2023, 2024, and 2025

annual targets. The smoothing process will be challenging when PUMA boundaries change again in 2032, and a technical update may be required at that point in time.

### Peer Cities

OHCS must produce a Housing Production Dashboard, which must include, for each city with a population of 10,000 or greater, “a comparative analysis of progress in comparison to the region and other local governments with similar market types” which are referred to as “peer cities.”<sup>6</sup> DLCD must base referral decisions to the Housing Acceleration Program on a city's relative progress and performance towards housing production targets.<sup>7</sup> The following housing market attributes that indicate market similarity were used to group cities into peers:

1. Current population size (static)
2. Share of households with incomes >\$200,000 (static)
3. Share of housing used as second and vacation homes (static)
4. Share of housing that is single unit detached (static)
5. Share of housing that is owner-occupied (static)
6. Population growth between 2010 and 2020 (percent change)

The methodology uses a statistical analysis called a K-Nearest Neighbor (KNN) to group each city with seven other peers based on their shared conditions across the seven variables listed above (see Figure 7 for the list of peers). The KNN algorithm uses place-level ACS and Decennial Census population estimates data as inputs, and each input is equally weighted. This approach allows for each city to be compared to its seven “closest” peers. This approach offers several advantages including a consistent number of peer cities, and for each city to be grouped with its best fitting peers.

KNN calculates a matrix of Euclidean distances between each pair of cities (the square root of the sum of squared differences for every variable). Some city pairs are socioeconomically and demographically “closer,” or more similar to each other than others. As Euclidean distance increases, the potential fit as a peer decreases. A common rule of thumb for KNN is to limit neighbor groupings to the square root of the total number of samples in the set. In this case, the KNN model contains 58 cities (and Tillamook County) that have a population over 10,000 in Oregon, indicating that 7 nearest neighbors is the optimal number for the OHNA application.

Not every local government defined as a “city with a population of 10,000 or greater” can be readily paired with market peers utilizing this methodology. This includes:

- Urban unincorporated lands within Metro counties: The peer methodology omits these local governments because they are non-standard and not reflected in any Census

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<sup>6</sup>“City” is used as shorthand for the jurisdictions that will receive peers. See ORS 456.601(3)b: [https://www.oregonlegislature.gov/bills\\_laws/ors/ors456.html](https://www.oregonlegislature.gov/bills_laws/ors/ors456.html)

<sup>7</sup> See ORS 197A.130: [https://www.oregonlegislature.gov/bills\\_laws/ors/ors197A.html](https://www.oregonlegislature.gov/bills_laws/ors/ors197A.html)

## Oregon Housing Needs Analysis 2026 Production Targets and Adopted Methodology

geographic unit. The closes approximation would be to use aggregation of census tracts, but these cross into other incorporated cities.

- Cities and specified unincorporated communities within the Tillamook County: While SB 406 (2023) defines these communities as "cities with a population of 10,000 or greater" for the purpose of housing planning, they are not large enough to have suitable Census data to be included in the peer methodology and are therefore grouped together.

**Figure 7. Peer Cities List**

City	Peer 1	Peer 2	Peer 3	Peer 4	Peer 5	Peer 6	Peer 7
Albany	Keizer	McMinnville	Medford	Grants Pass	Hermiston	Forest Grove	Woodburn
Ashland	Astoria	Pendleton	Klamath Falls	Newberg	North Bend	Newport	Tualatin
Astoria	Ashland	Pendleton	Klamath Falls	Roseburg	North Bend	The Dalles	Newport
Baker City	Sweet Home	North Bend	Central Point	Pendleton	Milwaukie	St. Helens	The Dalles
Beaverton	Hillsboro	Gresham	Eugene	Corvallis	Tualatin	Salem	Tigard
Bend	Oregon City	Newberg	Tigard	Redmond	Medford	Grants Pass	Forest Grove
Canby	Dallas	Oregon City	Gladstone	Central Point	Silverton	Newberg	Woodburn
Central Point	Dallas	Silverton	St. Helens	Woodburn	Oregon City	Keizer	Cornelius
Coos Bay	Pendleton	La Grande	Ontario	Springfield	Newport	McMinnville	Klamath Falls
Cornelius	Central Point	Troutdale	St. Helens	Dallas	Gladstone	Canby	Sandy
Corvallis	Beaverton	Eugene	Hillsboro	Monmouth	Gresham	Fairview	Tualatin
Cottage Grove	St. Helens	Woodburn	Prineville	Hermiston	Sweet Home	Dallas	Independence
Dallas	Woodburn	Central Point	Canby	St. Helens	Hermiston	Silverton	Oregon City
Eugene	Salem	Gresham	Hillsboro	Beaverton	Corvallis	Medford	Springfield
Fairview	Wilsonville	Lebanon	Independence	Tualatin	Monmouth	Hermiston	Corvallis
Forest Grove	Newberg	Molalla	The Dalles	Albany	Silverton	Hermiston	Keizer
Gladstone	Troutdale	Canby	Milwaukie	Central Point	Cornelius	Silverton	Oregon City
Grants Pass	Roseburg	The Dalles	Medford	Albany	Keizer	Silverton	McMinnville
Gresham	Salem	Eugene	Beaverton	Medford	Hillsboro	Springfield	Albany
Happy Valley	Sandy	Sherwood	West Linn	Oregon City	Lake Oswego	Canby	Bend
Hermiston	Independence	Lebanon	Woodburn	Albany	Dallas	Prineville	Forest Grove
Hillsboro	Beaverton	Eugene	Gresham	Salem	Tualatin	Corvallis	Tigard
Independence	Hermiston	Lebanon	Dallas	Silverton	Woodburn	Forest Grove	Prineville
Keizer	McMinnville	Albany	Woodburn	Newberg	Central Point	Milwaukie	Grants Pass

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City	Peer 1	Peer 2	Peer 3	Peer 4	Peer 5	Peer 6	Peer 7
Klamath Falls	Pendleton	Astoria	Roseburg	Grants Pass	Ashland	Monmouth	Springfield
La Grande	Coos Bay	Pendleton	Ontario	Klamath Falls	Springfield	Milwaukie	Newport
Lake Oswego	Tigard	Sherwood	Newberg	Oregon City	Tualatin	West Linn	Canby
Lebanon	Independence	Hermiston	Albany	Roseburg	Forest Grove	Prineville	Fairview
Lincoln City	Tillamook County	Astoria	Molalla	The Dalles	Newport	Ashland	North Bend
McMinnville	Keizer	Albany	Milwaukie	Newberg	Woodburn	Silverton	Grants Pass
Medford	Albany	Grants Pass	Salem	Gresham	Keizer	McMinnville	Springfield
Milwaukie	North Bend	McMinnville	Keizer	Silverton	Pendleton	Gladstone	Central Point
Molalla	The Dalles	Prineville	Forest Grove	Silverton	Redmond	Newberg	Roseburg
Monmouth	Klamath Falls	Astoria	Lebanon	Corvallis	Ashland	Roseburg	Fairview
Newberg	Forest Grove	Silverton	The Dalles	Keizer	Oregon City	McMinnville	Central Point
Newport	Astoria	Ashland	Pendleton	Coos Bay	McMinnville	North Bend	Newberg
North Bend	Milwaukie	Silverton	Newberg	The Dalles	Central Point	Pendleton	Grants Pass
Ontario	Springfield	Independence	Lebanon	Pendleton	McMinnville	Hermiston	Klamath Falls
Oregon City	Canby	Central Point	Newberg	Silverton	Dallas	Keizer	Forest Grove
Pendleton	Klamath Falls	Astoria	Roseburg	Milwaukie	McMinnville	Ashland	North Bend
Portland	Eugene	Salem	Gresham	Hillsboro	Beaverton	Medford	Bend
Prineville	The Dalles	Roseburg	Molalla	Sweet Home	Silverton	Cottage Grove	Hermiston
Redmond	The Dalles	Molalla	Grants Pass	Central Point	Prineville	Oregon City	Silverton
Roseburg	Grants Pass	Prineville	The Dalles	Pendleton	Albany	McMinnville	Klamath Falls
St. Helens	Woodburn	Cottage Grove	Dallas	Central Point	Troutdale	Silverton	Keizer
Salem	Eugene	Gresham	Medford	Hillsboro	Albany	Beaverton	Springfield
Sandy	Cornelius	Dallas	Oregon City	Central Point	Canby	Sherwood	Redmond
Sherwood	West Linn	Oregon City	Lake Oswego	Cornelius	Central Point	Canby	Sandy
Silverton	The Dalles	Newberg	North Bend	Central Point	Molalla	Milwaukie	Keizer
Springfield	McMinnville	Albany	Medford	Roseburg	Gresham	Pendleton	Keizer
Sweet Home	Prineville	Cottage Grove	Roseburg	The Dalles	Baker City	St. Helens	Redmond
The Dalles	Molalla	Silverton	Prineville	Grants Pass	Newberg	Roseburg	Forest Grove
Tigard	Tualatin	Newberg	Oregon City	Canby	Forest Grove	Lake Oswego	Keizer

## Oregon Housing Needs Analysis 2026 Production Targets and Adopted Methodology

City	Peer 1	Peer 2	Peer 3	Peer 4	Peer 5	Peer 6	Peer 7
Troutdale	Gladstone	St. Helens	Woodburn	Cornelius	Central Point	Milwaukie	Keizer
Tualatin	Tigard	Beaverton	Hillsboro	Ashland	Gresham	Newberg	Fairview
West Linn	Sherwood	Lake Oswego	Cornelius	Happy Valley	Oregon City	Sandy	Central Point
Wilsonville	Fairview	Hillsboro	Tualatin	Beaverton	Corvallis	Forest Grove	Monmouth
Woodburn	St. Helens	Dallas	Keizer	Central Point	Hermiston	McMinnville	Cottage Grove
Tillamook County	Lincoln City	Baker City	Newport	North Bend	Redmond	Sweet Home	Astoria

### Updating the Methodology

Since producing the first official needs estimates and production targets in 2025, DAS plans to revisit the methodology at least every five years. The law also allows OHCS and DLCD to recommend changes to the OHNA Methodology, provided that the agencies provide an opportunity for written and oral testimony on proposed recommendations.

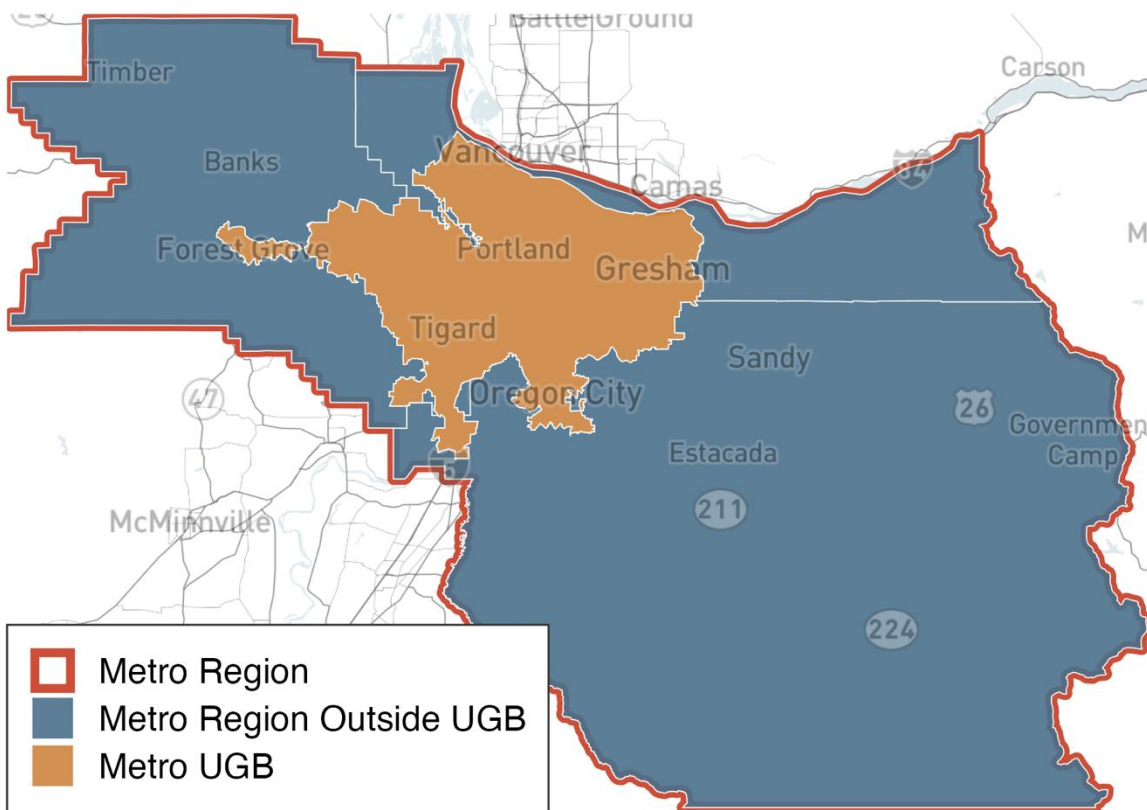
## Portland Metro Region

The law codifying the OHNA into the statewide land use planning system treats the Portland Metro UGB differently from the rest of the state. Under HB2889 (2023) Metro maintains its statutory responsibility to estimate the region’s housing need within the Metro UGB, while DAS is made responsible for allocating that need to Metro cities and urban, unincorporated lands (UULs).<sup>8</sup>

### OHNA Metro UGB Suballocation Methodology Steps

In the OHNA methodology, every region, except for the Portland Metro Region uses a top-down estimation of need, followed by a local jurisdiction allocation process for all UGB’s and non-UGB areas within the region. The Portland Metro Region is composed of Multnomah, Washington, and Clackamas counties. The Metro UGB is the growth boundary sitting inside the three counties, determined by Metro to separate urban and urbanizable land from rural land.

**Figure 8. Map of OHNA Metro Region (Three Counties), Metro Region Outside UGB, and Metro UGB Areas**



The OHNA methodology estimates the Portland Metro Region’s total housing need (areas in red outline in Figure 8) in the same manner as all other regions in the state, but then swaps in

<sup>8</sup>See ORS 184.453(3)(e) which requires DAS to consider Metro’s projected housing needs and ORS 197A.348(2) which requires Metro to project housing need for the components of need that are included in the OHNA.

## Oregon Housing Needs Analysis 2026 Production Targets and Adopted Methodology

Metro’s own estimate of current and future housing need from its Urban Growth Report (UGR)<sup>9</sup> for the units needed inside the Metro UGB (areas in orange in Figure 8). The estimates of housing units needed in the Metro Region Outside UGB area (the blue remainder in Figure 8) are held constant so any changes related to a control total inside the Metro UGB do not impact the need in the rest of the region.

### *Step A: Determining Need for Metro UGB*

The OHNA uses Metro’s estimate of current and future housing need from its 2024 adopted UGR for the units needed inside the Metro UGB.

Planning for housing need inside the Metro UGB is determined separately from the rest of the OHNA Metro Region. The OHNA Metro Region’s current and future need is calculated in the same manner as all other regions. However, within the OHNA Metro Region future and current need is allocated to UGBs using an amended methodology different from all other regions.

Current and future need is first determined for the Metro Region Outside UGB Areas (including the cities of Sandy, Estacada, Canby, Molalla, Barlow, Gaston, Banks, and North Plains), and the county areas outside of all UGBs separately. Then the estimate of current and future need within the Metro UGB is determined using Metro’s adopted UGR, which includes an estimate of total future need from “household growth” (population growth and demographic change combined) along with estimates of need for underproduction, second and vacation homes, and units to address homelessness.

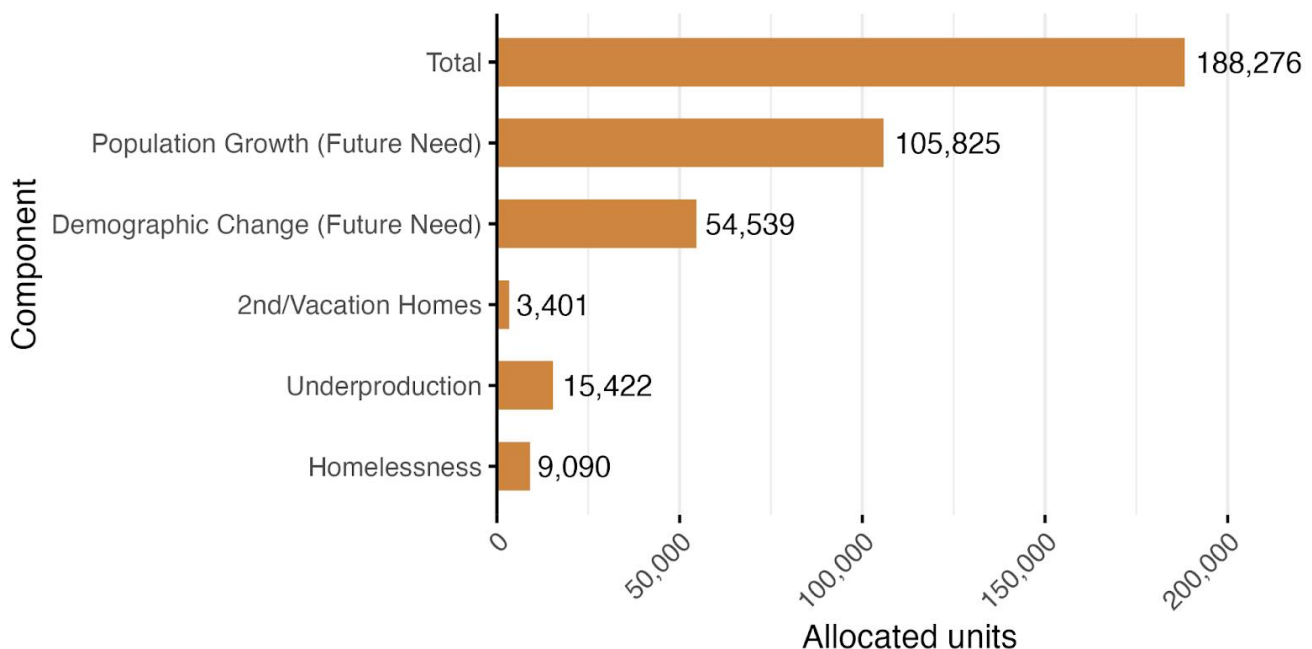
To align the Metro UGB need with the rest of OHNA, the UGR-calculated “household growth” need is split into population growth and demographic change components, and across household income brackets using the pre-existing distributions from the rest of the OHNA Metro Region. The rest of the Metro UGR-calculated components are swapped into the model for the Metro UGB as-is and allocated along the same regional income distributions.

Oregon statute requires that Metro must coordinate its regional forecasts with governments within the UGB. These growth forecast distributions are used to update land use and transportation plans, regulations and related policies. Metro typically completes its distributed forecast within one to two years after adopting the regional forecast in the UGR. Once available, the distributed forecast will be substituted in place of housing capacity when determining subsequent housing need allocations within the Metro UGB.

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<sup>9</sup> See Metro’s Urban Growth Report here: <https://www.oregonmetro.gov/public-projects/2024-growth-management-decision/>

**Figure 9. Distribution by Component of Need for OHNA Metro Region, 2025**



*Step B: Allocation of Need from UGBs to Cities and Urban Unincorporated Lands (UULs)*

As noted on page 20, House Bill 2889 (2023) maintains Metro’s statutory responsibility to estimate the region’s housing need within the Metro UGB, while giving DAS the responsibility to allocate that need to Metro cities and urban, unincorporated lands (UULs).

The allocation of future and current housing need to the cities and UULs within the OHNA Metro Region but outside the Metro UGB (the blue areas in Figure 8 on page 20) mirrors the methodology used in all other OHNA regions of the state.

The allocation of future and current housing need to cities and UULs within the Metro UGB uses a different allocation methodology that is unique to the Metro UGB. This approach reflects the fact that the area inside the Metro UGB functions as a single housing market with many different jurisdictions; the Metro UGB also has access to more robust data that allows for more nuanced indicators. Unique elements of the allocation methodology for the Metro UGB include a more refined approach to capturing access to jobs, and an approach that takes existing housing affordability and recent housing production into consideration when allocating existing, unmet housing needs. Each component of the methodology is allocated using the following indicators and weights:

**Units Needed for Underproduction and for People Experiencing Homelessness:**

- **Production:** 50% from the city’s rate of housing unit production relative to the UGB-wide average as calculated from the Regional Land Information System (RLIS) parcel-based housing layer, which provides unit counts and year built for parcels. Units built within the last five years of the model “run-year” (the year corresponding to the model’s PUMS

data inputs) are calculated as a share of total units within each jurisdiction and UUL (**Inverse weight** – see comments on Inverse Weighting on page 27).

- **Affordability:** 50% from the percentage of a city's housing units that are rental 0-50% AMI units, relative to the UGB-wide average, using the most recent vintage of the CHAS 5-year data (**Inverse weight**). Urban unincorporated lands within the UGB have their affordability level calculated using tract-level CHAS data for tracts with at least 30% of their area in the UUL. CHAS is more out-of-date compared to the ACS/PUMS products, so the model corrects for this by applying the affordability rate from CHAS to the more recent unit counts calculated with RLIS's Housing Layer.

Future need is allocated to cities (including the unincorporated urbanizable areas for which they have planning authority based on intergovernmental agreements) and UULs using the following indicators and weights:

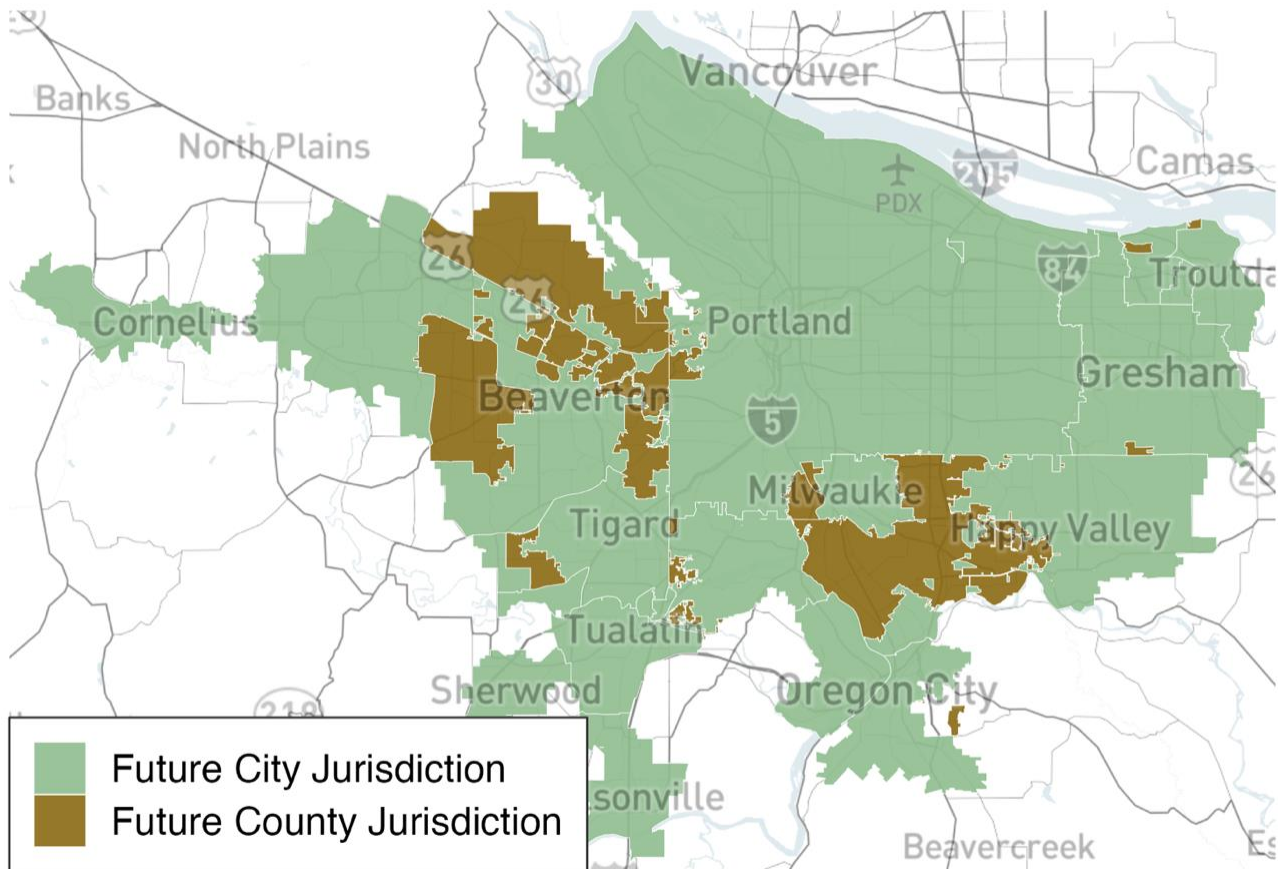
### Units Needed to Accommodate Population Growth:

- **Residential capacity:** 33% from the city's share of jurisdictional residential capacity, as calculated with Metro's UGR process, wherein capacity in Metro's unincorporated urbanizable areas has been assigned to their future responsible jurisdictions as shown in Figure 10.<sup>10</sup>
- **Jobs access:** 33% from the city's share of UGB employed residents who live within areas with adequate transit or walking access to jobs, as calculated with TriMet and SMART's most recent transit schedule data and OpenStreetMap street grid data (see comments on Measuring Jobs Access on page 25)
- **Forecasted job growth:** 33% from the city's share of all forecasted jobs to be added between 2020 and 2050, based on Metro's UGR modeling. This metric uses Metro's TAZ-level job forecasts, which are then assigned to cities using a Metro-provided map of expected future jurisdictional responsibilities (see Figure 11 on page 26).

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<sup>10</sup> The allocation is required to incorporate population forecasts under ORS 195.033 and 195.036. Under these statutes, only Metro is authorized to create population projections for cities within the Metro UGB for use in comprehensive planning. Because Metro's distributed forecast won't be published until 2025 and given the relatively close statistical relationship between modeled residential capacity and expected population growth, residential capacity is used as a proxy for the forecast in the initial run of the methodology. In the future, once Metro's distributed forecast is adopted, it will be substituted in as the source for this component of the allocation.

**Figure 10. Future Metro UGB Jurisdictional Responsibility**



**Units needed to accommodate demographic change:**

- **Current population:** 33% from the city's share of current (baseline) population, as calculated with 2020 block-level Decennial Census data. The choice to use Decennial Census is driven by the need to allocate population to the complex UUL boundaries as well as cities, which can only be done with granular geographies like census blocks
- **Jobs access:** 33% from the city's share of UGB employed residents who live within areas with adequate transit or walking access to jobs, as calculated with TriMet and SMART's most recent transit schedule data and OpenStreetMap street grid data (see below).
- **Residential capacity:** 33% from the city's share of jurisdictional residential capacity, as calculated with Metro's UGR process, wherein capacity in Metro's unincorporated urbanizable areas has been assigned to their future responsible jurisdictions.

**Units lost to second and vacation homes:**

- **Second and vacation homes:** 100% from the city's share of all current UGB second and vacation homes as calculated with 2020 Decennial Census place-level counts

## **Measuring Jobs Access**

One of the weights used to allocate units for population growth to Metro cities is a measurement of transit access to jobs. The approach uses current TriMet and SMART's schedule data, OpenStreetMap street grid data, and open-source trip-routing software to plot transit and walking trips from every Transit Analysis Zone (TAZ) in the Metro UGB to every other TAZ in the Metro UGB.

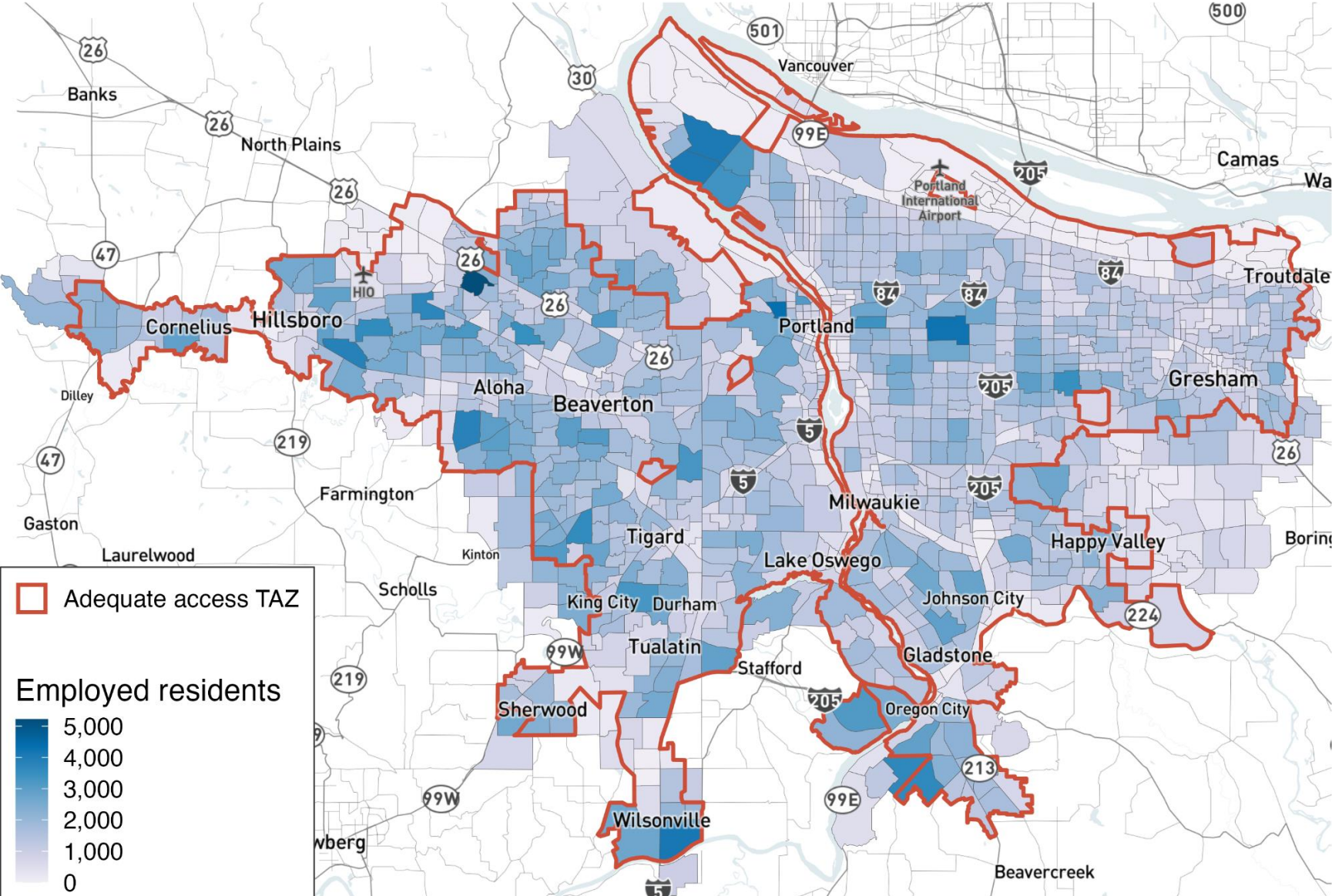
Walk and transit access was chosen specifically to be most applicable to all households, regardless of income and access to private vehicles as a mode of transportation. Joining this with Longitudinal Employer-Household Dynamics (LEHD) job location data spatially allocated to the TAZs, the model calculates the number of jobs reachable by transit within a 60-minute journey, mid-week, at 8:00 AM. The UGBs' TAZs are rank ordered by job access, and a threshold is set at the 10<sup>th</sup> percentile to denote "transit access" zones. Each TAZ is assigned to a city based on Metro's TAZ planning jurisdiction shapefile, and where this information is missing, it is assigned based on which city has the largest overlap with any given TAZ. The number of employed residents living in these "transit access TAZs" is calculated for each jurisdiction, and the jurisdiction's share of the UGB's total is used as the final weight.

In the interest of maintaining accurate assessments of transit access, future iterations of the OHNA model will incorporate the most up-to-date TAZ-level jobs totals, transit schedules, and OpenStreetMap data.

## **Measuring Job Growth**

Similar to the transit allocation component, the methodology incorporates forecasted job growth to operationalize the statutory direction to incorporate access/proximity to jobs as part of the allocation. This component has the effect of allocating more housing where future job growth is projected to occur. This data set is provided by Metro from their housing and transportation modeling processes, based on TAZ geographies, with job total forecasts for 2020 and 2050 included in separate columns for each TAZ. TAZs are joined spatially to jurisdictional boundaries (including planning agreements), based on spatial data provided by Metro and the change in jobs between 2020 and 2050 is totaled for all Metro jurisdictions. The weight is calculated as a jurisdiction's share of all UGB added jobs.

Figure 11. TAZ Transit Access Zones Used to Calculate the Jobs Access Weights



### Inverse Weighting

Several weights used in the Metro UGB Suballocation Methodology are termed “inverse weights.” The selected inverse weights operationalize statutory direction for the allocation to incorporate an “equitable distribution of housing” under ORS 184.453 (3)(c), ensuring cities that have historically underproduced market-rate or affordable housing are responsible for a greater proportionate share of housing underproduction. The selected inverse weights have the effect of allocating more housing, particularly housing affordable at lower incomes, to cities that have historically produced less market-rate and affordable housing units. The inverse weighting system works in the following manner, using the “Production” weight as an example:

- Each city’s rate of housing unit production is calculated by taking the previous five years of total permits from RLIS housing unit data and converting them to a percentage of current total units.
- The UGB average is calculated from among all cities.
- The “delta,” or nominal units needed for each city to match the UGB’s average rate, is calculated. Cities above the UGB average receive a weight of 0.
- All the nominal deltas are converted to percent of the total delta. This percentage becomes half the weight used to allocate underproduction and units needed to accommodate homelessness.

#### Example Delta Calculation for Inverse Weights

UGB average rate of housing unit production: 7% of current units (average of all cities)

City X	City Y
City X’s current units: 12,000 City X’s actual production: 600 City X’s production rate: 5% of current units	City Y’s current units: 15,000 City Y’s actual production: 1,500 City Y’s production rate: 10% of current units
To match the UGB rate of housing production, City X should have built 840 units (7% * 12,000)	To match the UGB rate of housing production, City Y only needed to build 1,050 units (7% * 15,000)
Its delta is 240 units (840 – 600)	Since it produced more than the average, it has no delta, and its weight would be zero.
If the sum of all cities’ deltas was 500, City X would have 240/500 or 48%. Because recent production is only half of the weight for the current need allocation, this 48% would be averaged with the weight calculated for affordability to arrive at a blended weight.	

## Statewide and Regional Results

This section provides statewide and regional results of the total 20-year housing need by income and need component along with the annual 2026 production target. Local city-level results are provided by income level in Appendix A. The federal government shutdown in October and November delayed the release of many of the foundational data sources used in the methodology. Ultimately all of the sources of federal data that have regular annual data updates were released in time for use in this year's update.

The delay of the data release did however impact some components of the estimate of housing need. The homelessness methodology and source data used in the methodology are produced by Portland State University's Homelessness Research and Action Collaborative (HRAC). Data sources used by HRAC were not available in time to allow for an annual update to the homelessness data. Therefore there is not an update for this component of need, and the 2025 vintage was used for the 2026 production targets and 20-year estimate of need. Other data used in the methodology are updated infrequently and are therefore either lagged until a more recent vintage is available, or operate with predictable and known data update cycles.

The population forecasts used in the methodology to inform the population growth and demographic change components are produced by Portland State University's Population Research Center (PRC). PRC produces an annual update to their statewide population forecast, but the update only covers a portion of the state. PRC divides the state into four regions, and then annually produces an update for only one of the four regions (note that PRC regions do not align with the OHNA regions). Each of the PRC regions is then updated on a four-year cycle, in 2024 the Metro region was updated, and in 2025 the Willamette Valley was updated.

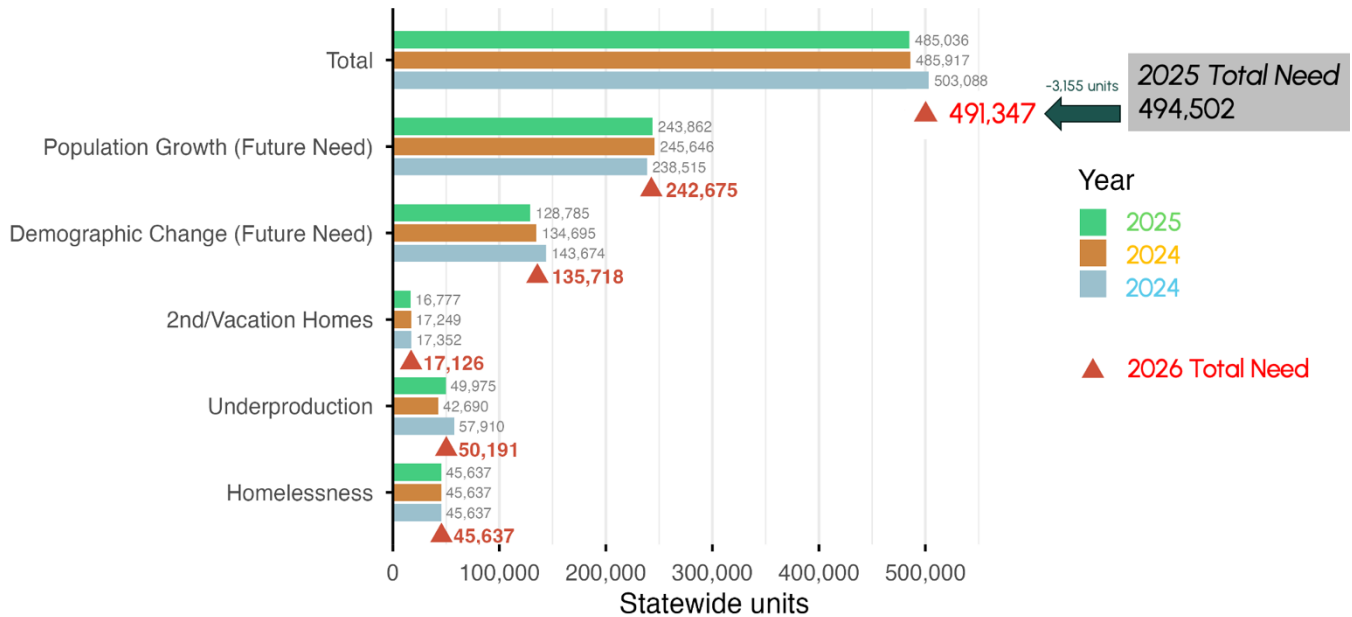
The Metro region was only partially updated in this year's methodology, as the Metro UGB calculation of need is statutorily conducted by Metro. Metro currently updates their growth estimates every 6 years as part of the Urban Growth Report process. That process was most recently completed in 2024 and used as part of the 2025 calculation of 20 years of need and annual production target. All other parts of the Metro region were updated except for the Metro UGB which is unchanged in the calculation of the total units of need. Local allocation is updated for the entirety of the state on an annual basis. See the following section of the report for a more complete description of all of the data sources and their update schedules.

The 2026 20-year calculation of total need is the average of the 2023, 2024, and 2025 annual calculations of need, which rely primarily on census data that are lagged by a year. For example, the 2025 annual calculation of need uses 2024 census data as the basis for its calculation. The annual production target is the combination of a 20-year time horizon for future need, and a 10-year time horizon for current need. The following charts and tables show the state components of need for each of the 3 years used to create the 2026 20-year total need, along with the statewide and regional annual regional targets by income level.

## Oregon Housing Needs Analysis 2026 Production Targets and Adopted Methodology

The 2026 statewide calculation of 20-years of need is 491,347 units, down from 494,502 units in 2025. This translates to a 2026 statewide annual production target of 29,359 units, down from 29,522 units in 2025.

**Figure 12. Statewide components of 20 years of total need for 2026**



**Figure 13. Statewide 2025 vs. 2026 Annual Production Target**

### 2025 Production Target

Future Need over 20 years = 19,928

Current Need over 10 years = 9,594

Production Target = 29,522

### 2026 Production Target

Future Need over 20 years = 19,776

Current Need over 10 years = 9,583

Production Target = 29,359

Change from 25 to 26  
-169 Units

**Figure 14. Statewide and Regional 20-Year Total Housing Need by Income Level**

Region	Income Level					Total Need
	0-30%	31-60%	61-80%	81-120%	>120%	
Central	7,807	8,977	6,900	12,809	22,455	58,949
Metro	31,606	31,422	20,714	36,180	68,241	188,164
Northeast	3,527	3,354	1,962	4,527	6,406	19,775
Northern Coast	4,441	3,328	1,252	3,366	3,550	15,938
Southeast	2,816	2,031	1,183	2,001	3,678	11,708

Oregon Housing Needs Analysis 2026 Production Targets and Adopted Methodology

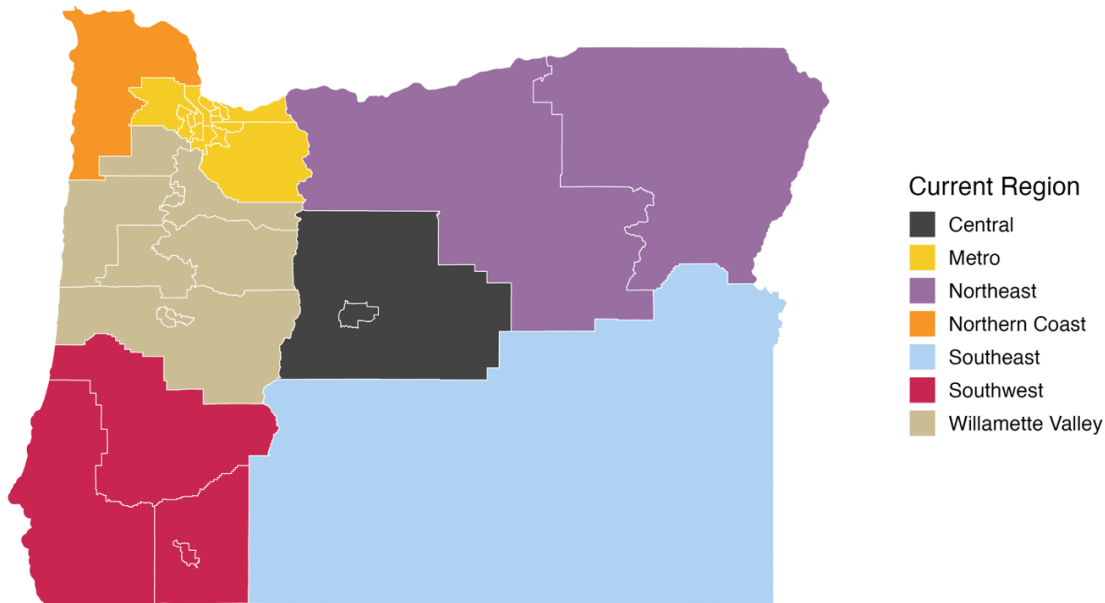
<b>Southwest</b>	13,239	11,055	6,630	10,682	20,713	62,319
<b>Willamette Valley</b>	32,923	25,151	13,966	23,958	38,496	134,494
<b>Oregon</b>	<b>96,359</b>	<b>85,319</b>	<b>52,607</b>	<b>93,523</b>	<b>163,540</b>	<b>491,347</b>

**Figure 15. Statewide 20-Year Total Housing Need by Income Level and Component**

Income Level	Current Need		Future Need			Total Needs
	Underproduction	Units for Homelessness	Second & Vacation Homes	Demographic Change	Pop. Growth	
<b>0-30%</b>	14,770	35,287	-	16,774	29,529	96,359
<b>31-60%</b>	16,515	8,223	-	21,967	38,613	85,319
<b>61-80%</b>	7,921	2,127	-	15,226	27,333	52,607
<b>81-120%</b>	7,406	-	11,250	26,724	48,142	93,523
<b>&gt;120%</b>	3,579	-	5,876	55,027	99,058	163,540
<b>Total</b>	<b>50,191</b>	<b>45,637</b>	<b>17,126</b>	<b>135,718</b>	<b>242,675</b>	<b>491,347</b>

**Regional Results**

**Figure 16. OHNA Regions (from page 3)**



**Figure 17. Central Region 20-Year Total Housing Need by Income Level and Component**

Income Level	Current Need		Future Need			Total Needs
	Underproduction	Units for Homelessness	Second & Vacation Homes	Demographic Change	Pop. Growth	
0-30%	1,535	2,113	-	997	3,163	7,807
31-60%	1,991	398	-	1,579	5,010	8,977
61-80%	1,374	105	-	1,298	4,123	6,900
81-120%	1,347	-	1,809	2,314	7,339	12,809
>120%	696	-	1,688	4,815	15,256	22,455
<b>Total</b>	<b>6,943</b>	<b>2,616</b>	<b>3,497</b>	<b>11,003</b>	<b>34,890</b>	<b>58,949</b>

**Figure 18. Northern Coast Region 20-Year Total Housing Need by Income Level and Component**

Income Level	Current Need		Future Need			Total Needs
	Underproduction	Units for Homelessness	Second & Vacation Homes	Demographic Change	Pop. Growth	
0-30%	1,030	2,374	-	537	500	4,441
31-60%	1,244	410	-	870	805	3,328
61-80%	392	76	-	406	378	1,252
81-120%	446	-	1,260	865	796	3,366
>120%	175	-	624	1,433	1,319	3,550

Oregon Housing Needs Analysis 2026 Production Targets and Adopted Methodology

<b>Total</b>	<b>3,286</b>	<b>2,859</b>	<b>1,883</b>	<b>4,111</b>	<b>3,798</b>	<b>15,938</b>
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**Figure 19. Southwest Region 20-Year Total Housing Need by Income Level and Component**

Income Level	Current Need		Future Need			Total Needs
	Underproduction	Units for Homelessness	Second & Vacation Homes	Demographic Change	Pop. Growth	
0-30%	1,554	6,613	-	2,200	2,870	13,239
31-60%	2,004	1,191	-	3,418	4,443	11,055
61-80%	963	366	-	2,302	2,998	6,630
81-120%	830	-	1,578	3,592	4,682	10,682
>120%	556	-	615	8,498	11,045	20,713
<b>Total</b>	<b>5,907</b>	<b>8,170</b>	<b>2,193</b>	<b>20,010</b>	<b>26,038</b>	<b>62,319</b>

**Figure 20. Willamette Valley Region 20-Year Total Housing Need by Income Level and Component**

Income Level	Current Need		Future Need			Total Needs
	Underproduction	Units for Homelessness	Second & Vacation Homes	Demographic Change	Pop. Growth	
0-30%	4,959	14,794	-	4,721	8,450	32,923
31-60%	5,211	3,819	-	5,772	10,348	25,151
61-80%	2,181	992	-	3,858	6,935	13,966
81-120%	2,083	-	2,718	6,850	12,308	23,958
>120%	1,020	-	932	13,016	23,529	38,496
<b>Total</b>	<b>15,453</b>	<b>19,605</b>	<b>3,650</b>	<b>34,216</b>	<b>61,570</b>	<b>134,494</b>

**Figure 21. Northeast Region 20-Year Total Housing Need by Income Level and Component**

Income Level	Current Need		Future Need			Total Needs
	Underproduction	Units for Homelessness	Second & Vacation Homes	Demographic Change	Pop. Growth	
0-30%	709	1,128	-	858	831	3,527
31-60%	637	288	-	1,229	1,200	3,354
61-80%	264	106	-	809	783	1,962
81-120%	263	-	1,302	1,507	1,454	4,527
>120%	134	-	729	2,820	2,723	6,406
<b>Total</b>	<b>2,007</b>	<b>1,522</b>	<b>2,031</b>	<b>7,224</b>	<b>6,991</b>	<b>19,775</b>

**Figure 22. Southeast Region 20-Year Total Housing Need by Income Level and Component**

	Current Need		Future Need			
Income Level	Underproduction	Units for Homelessness	Second & Vacation Homes	Demographic Change	Pop. Growth	Total Needs
0-30%	410	1,238	-	774	393	2,816
31-60%	334	423	-	843	430	2,031
61-80%	148	114	-	610	311	1,183
81-120%	188	-	290	1,009	514	2,001
>120%	100	-	183	2,237	1,158	3,678
<b>Total</b>	<b>1,180</b>	<b>1,775</b>	<b>473</b>	<b>5,474</b>	<b>2,807</b>	<b>11,708</b>

**Figure 23. Metro Region 20-Year Total Housing Need by Income Level and Component**

	Current Need		Future Need			
Income Level	Underproduction	Units for Homelessness	Second & Vacation Homes	Demographic Change	Pop. Growth	Total Needs
0-30%	4,572	7,026	-	6,686	13,322	31,606
31-60%	5,095	1,703	-	8,255	16,376	31,422
61-80%	2,599	368	-	5,942	11,804	20,714
81-120%	2,250	-	2,294	10,586	21,050	36,180
>120%	898	-	1,105	22,210	44,028	68,241
<b>Total</b>	<b>15,415</b>	<b>9,090</b>	<b>3,400</b>	<b>53,679</b>	<b>106,580</b>	<b>188,164</b>

**Appendix A. Local Results**

Each figure contains the UGBs in an OHNA Region and displays the UGB’s 1-year annual housing production target in total and by income level, as well as the 20-year housing need allocation in total and by income level. See page 15 for the calculation of annual housing production targets.

**Figure 24. Central Region Results**

Central UGBs	Results	Total	0-30% AMI	31-60% AMI	61-80% AMI	81-120% AMI	>120% AMI
Bend UGB	1-year	2,010	348	336	245	418	663
	20-year	34,116	4,640	5,192	3,962	7,509	12,814
Culver UGB	1-year	15	3	3	2	3	5
	20-year	244	37	39	29	52	87
La Pine UGB	1-year	58	9	9	7	13	20
	20-year	1,016	127	148	114	232	394
Madras UGB	1-year	135	26	24	17	26	42
	20-year	2,236	334	365	277	450	811
Metolius UGB	1-year	10	2	2	1	2	3
	20-year	159	24	26	20	31	57
Prineville UGB	1-year	188	36	34	24	36	58
	20-year	3,091	469	503	380	630	1,109
Redmond UGB	1-year	606	109	106	78	117	197
	20-year	10,251	1,463	1,652	1,264	2,067	3,804
Sisters UGB	1-year	101	14	15	11	23	37
	20-year	1,802	205	247	193	437	720

\*On January 12, 2026, OEA revised this table to correct spreadsheet error

**Figure 25. Metro Region Results**

Metro UGBs	Results	Total	0-30% AMI	31-60% AMI	61-80% AMI	81-120% AMI	>120% AMI
Banks UGB	1 year	9	2	2	1	2	3
	20 year	162	31	28	18	29	56
Barlow UGB	1 year	0	0	0	0	0	0
	20 year	6	1	1	1	1	2
Beaverton	1 year	766	147	136	86	138	259
	20 year	13,810	2,230	2,301	1,538	2,611	5,130
Canby UGB	1 year	125	28	22	14	21	39
	20 year	2,173	394	365	237	401	774
Clackamas UA	1 year	625	165	127	72	99	163
	20 year	9,994	2,107	1,838	1,125	1,748	3,175
Cornelius	1 year	63	8	10	7	12	26
	20 year	1,250	159	193	138	246	513
Durham	1 year	14	5	3	2	2	2
	20 year	188	58	41	22	28	40
Estacada UGB	1 year	41	9	7	4	7	14
	20 year	732	125	121	80	137	269
Fairview	1 year	45	8	8	5	8	16
	20 year	821	130	134	91	158	309
Forest Grove	1 year	158	20	24	17	32	65
	20 year	3,169	394	485	349	633	1,308
Gaston UGB	1 year	4	1	1	0	1	1
	20 year	64	16	12	7	10	19
Gladstone	1 year	78	27	18	9	10	13
	20 year	1,048	307	222	120	159	240
Gresham	1 year	497	79	83	55	94	186
	20 year	9,428	1,339	1,506	1,043	1,841	3,700
Happy Valley	1 year	459	85	80	51	83	160
	20 year	8,382	1,316	1,381	933	1,588	3,164
Hillsboro	1 year	741	140	131	83	134	253
	20 year	13,425	2,149	2,222	1,491	2,550	5,013
Johnson City	1 year	5	2	1	1	0	0
	20 year	49	21	13	6	5	4
King City	1 year	128	31	25	15	21	36
	20 year	2,122	416	377	237	384	708
Lake Oswego	1 year	322	95	68	36	51	73
	20 year	4,850	1,139	913	535	873	1,391
Maywood Park	1 year	8	3	2	1	1	2
	20 year	122	31	24	14	20	34

Oregon Housing Needs Analysis 2026 Production Targets and Adopted Methodology

Metro UGBs	Results	Total	0-30% AMI	31-60% AMI	61-80% AMI	81-120% AMI	>120% AMI
Milwaukie	1 year	108	14	17	12	22	44
	20 year	2,157	270	329	236	437	885
Molalla UGB	1 year	64	14	11	7	11	21
	20 year	1,145	200	191	126	211	417
Multnomah UA	1 year	55	11	10	6	10	18
	20 year	983	158	162	108	192	363
North Plains UGB	1 year	39	7	6	4	7	14
	20 year	721	110	116	80	137	278
Oregon City	1 year	275	40	44	30	53	108
	20 year	5,355	719	837	592	1,052	2,155
Portland	1 year	2,856	350	424	304	614	1,163
	20 year	56,913	6,907	8,434	6,062	12,259	23,252
Rivergrove	1 year	3	1	1	0	1	0
	20 year	44	13	8	4	10	9
Sandy UGB	1 year	85	18	15	9	15	28
	20 year	1,513	262	251	166	281	552
Sherwood	1 year	200	46	38	23	33	60
	20 year	3,402	639	593	383	614	1,173
Tigard	1 year	461	86	81	52	83	159
	20 year	8,376	1,330	1,383	931	1,591	3,142
Troutdale	1 year	75	14	13	8	14	26
	20 year	1,371	213	224	151	268	515
Tualatin	1 year	222	76	51	26	30	39
	20 year	3,051	861	638	350	465	736
Washington UA	1 year	1,467	476	329	171	205	287
	20 year	20,887	5,522	4,233	2,385	3,313	5,434
West Linn	1 year	238	83	55	28	32	40
	20 year	3,205	932	675	364	501	733
Wilsonville	1 year	195	46	37	22	33	56
	20 year	3,262	621	568	360	609	1,105
Wood Village	1 year	19	2	3	2	4	8
	20 year	389	48	59	42	79	160

\*On January 12, 2026, OEA revised this table to correct spreadsheet error

**Figure 26. Northeast Region Results**

Northeast UGBs	Results	Total	0-30% AMI	31-60% AMI	61-80% AMI	81-120% AMI	>120% AMI
Adams UGB	1 year	2	0	0	0	0	0
	20 year	25	5	5	3	5	8
Antelope UGB	1 year	0	0	0	0	0	0
	20 year	8	0	0	0	4	3
Arlington UGB	1 year	4	1	1	0	1	1
	20 year	63	12	11	6	14	20
Athena UGB	1 year	6	2	1	1	1	2
	20 year	10	21	19	11	19	32
Baker City UGB	1 year	68	18	13	7	13	17
	20 year	1,103	225	198	112	232	337
Boardman UGB	1 year	44	11	9	5	7	12
	20 year	728	145	136	79	136	232
Canyon City UGB	1 year	4	1	1	0	1	1
	20 year	62	13	11	6	14	18
Cascade Locks UGB	1 year	11	2	2	1	2	3
	20 year	198	31	33	20	46	67
Condon UGB	1 year	5	1	1	0	2	1
	20 year	86	11	9	5	33	28
Cove UGB	1 year	2	1	0	0	0	1
	20 year	33	8	6	4	6	10
Dayville UGB	1 year	1	0	0	0	0	0
	20 year	12	1	1	1	6	4
Dufur UGB	1 year	4	1	1	0	1	1
	20 year	59	12	11	6	12	18
Echo UGB	1 year	3	1	1	0	1	1
	20 year	56	11	10	6	12	18
Elgin UGB	1 year	9	2	2	1	2	2
	20 year	138	30	25	14	28	40
Enterprise UGB	1 year	22	6	4	2	4	6
	20 year	358	70	63	36	79	111
Fossil UGB	1 year	3	1	0	0	1	1
	20 year	49	8	7	4	16	15
Granite UGB	1 year	3	0	0	0	2	1
	20 year	58	0	0	0	36	21
Grass Valley UGB	1 year	1	0	0	0	0	0
	20 year	13	3	3	1	2	4

Oregon Housing Needs Analysis 2026 Production Targets and Adopted Methodology

<b>Northeast UGBs</b>	<b>Results</b>	<b>Total</b>	<b>0-30% AMI</b>	<b>31-60% AMI</b>	<b>61-80% AMI</b>	<b>81-120% AMI</b>	<b>&gt;120% AMI</b>
Haines UGB	1 year	2	0	0	0	0	0
	20 year	27	5	4	2	8	8
Halfway UGB	1 year	4	1	0	0	1	1
	20 year	62	7	6	4	24	20
Helix UGB	1 year	1	0	0	0	0	0
	20 year	17	4	3	2	3	5
Heppner UGB	1 year	10	2	2	1	2	2
	20 year	156	29	25	14	40	48
Hermiston UGB	1 year	166	40	33	18	29	47
	20 year	2,805	535	519	306	535	911
Hood River UGB	1 year	110	24	19	10	26	31
	20 year	1,876	311	289	168	501	606
Huntington UGB	1 year	3	0	0	0	1	1
	20 year	48	6	5	3	20	15
Imbler UGB	1 year	2	0	0	0	0	0
	20 year	30	6	5	3	8	9
Ione UGB	1 year	2	0	0	0	0	0
	20 year	28	5	4	3	7	9
Irrigon UGB	1 year	9	2	2	1	1	2
	20 year	148	31	28	16	27	45
Island City UGB	1 year	9	2	2	1	2	2
	20 year	155	31	29	17	29	49
John Day UGB	1 year	15	4	3	2	3	4
	20 year	244	50	43	24	52	74
Joseph UGB	1 year	9	2	1	1	3	2
	20 year	150	21	19	11	50	48
La Grande UGB	1 year	95	26	19	10	16	24
	20 year	1,528	323	288	165	285	467
Lexington UGB	1 year	1	0	0	0	0	0
	20 year	17	3	3	2	4	5
Lonerock UGB	1 year	1	0	0	0	0	0
	20 year	20	2	2	1	8	7
Long Creek UGB	1 year	3	1	0	0	0	0
	20 year	49	8	7	4	14	16
Lostine UGB	1 year	2	0	0	0	1	1
	20 year	36	4	3	2	15	12
Maupin UGB	1 year	6	1	1	0	3	2
	20 year	119	9	9	5	54	41

Oregon Housing Needs Analysis 2026 Production Targets and Adopted Methodology

<b>Northeast UGBs</b>	<b>Results</b>	<b>Total</b>	<b>0-30% AMI</b>	<b>31-60% AMI</b>	<b>61-80% AMI</b>	<b>81-120% AMI</b>	<b>&gt;120% AMI</b>
Milton-Freewater UGB	1 year	34	9	7	4	6	8
	20 year	536	117	101	57	100	160
Mitchell UGB	1 year	1	0	0	0	0	0
	20 year	22	2	2	1	9	7
Monument UGB	1 year	1	0	0	0	0	0
	20 year	9	2	2	1	1	3
Moro UGB	1 year	4	1	1	0	1	1
	20 year	61	12	12	7	11	19
Mosier UGB	1 year	5	1	1	0	2	2
	20 year	101	9	9	5	43	35
Mt. Vernon UGB	1 year	2	1	0	0	0	0
	20 year	28	7	5	3	5	8
North Powder UGB	1 year	2	1	1	0	0	1
	20 year	41	8	8	5	7	13
Pendleton UGB	1 year	120	32	24	13	21	31
	20 year	1,949	403	360	206	381	599
Pilot Rock UGB	1 year	5	1	1	0	1	1
	20 year	86	17	13	7	23	25
Prairie City UGB	1 year	4	1	1	0	1	1
	20 year	59	10	8	5	18	18
Richland UGB	1 year	2	0	0	0	1	1
	20 year	39	3	3	2	18	13
Rufus UGB	1 year	2	0	0	0	0	0
	20 year	30	5	4	3	9	10
Seneca UGB	1 year	2	0	0	0	1	1
	20 year	40	3	2	1	21	14
Shaniko UGB	1 year	0	0	0	0	0	0
	20 year	6	0	0	0	3	2
Spray UGB	1 year	1	0	0	0	1	0
	20 year	26	2	2	1	12	9
Stanfield UGB	1 year	16	3	3	2	3	5
	20 year	288	49	53	32	55	99
Summerville UGB	1 year	0	0	0	0	0	0
	20 year	8	2	1	1	2	2
Sumpter UGB	1 year	13	0	0	0	8	5
	20 year	257	4	4	2	156	92
The Dalles UGB	1 year	111	30	22	12	19	28
	20 year	1,785	378	334	190	342	542

Oregon Housing Needs Analysis 2026 Production Targets and Adopted Methodology

<b>Northeast UGBs</b>	<b>Results</b>	<b>Total</b>	<b>0-30% AMI</b>	<b>31-60% AMI</b>	<b>61-80% AMI</b>	<b>81-120% AMI</b>	<b>&gt;120% AMI</b>
Ukiah UGB	1 year	2	0	0	0	1	1
	20 year	30	2	2	1	16	10
Umatilla UGB	1 year	49	13	10	5	8	13
	20 year	812	164	150	87	156	92
Union UGB	1 year	9	2	2	1	2	2
	20 year	148	28	25	15	34	46
Unity UGB	1 year	1	0	0	0	0	0
	20 year	11	0	0	0	6	4
Wallowa UGB	1 year	4	1	1	0	1	1
	20 year	68	12	10	5	20	20
Wasco UGB	1 year	1	0	0	0	0	0
	20 year	23	4	3	2	7	7
Weston UGB	1 year	8	2	2	1	1	2
	20 year	137	25	25	15	27	45

\*On January 12, 2026, OEA revised this table to correct spreadsheet error

**Figure 27. Northern Coast Region Results**

Northern Coast UGB	Results	Total	0-30% AMI	31-60% AMI	61-80% AMI	81-120% AMI	>120% AMI
Astoria UGB	1 year	140	60	35	11	17	17
	20 year	1,802	654	431	152	259	307
Bay City UGB	1 year	14	6	4	1	2	2
	20 year	183	68	43	15	29	29
Cannon Beach UGB	1 year	44	14	8	3	11	8
	20 year	645	150	100	36	211	148
Clatskanie UGB	1 year	23	10	6	2	3	3
	20 year	294	107	71	25	41	50
Columbia City UGB	1 year	13	6	3	1	1	1
	20 year	161	62	40	14	21	25
Garibaldi UGB	1 year	12	5	3	1	2	2
	20 year	158	50	34	12	31	30
Gearhart UGB	1 year	25	7	4	1	7	5
	20 year	373	81	54	19	131	88
Manzanita UGB	1 year	22	4	3	1	8	5
	20 year	364	50	36	13	164	100
Nehalem UGB	1 year	15	5	3	1	3	3
	20 year	222	61	45	17	50	49
Prescott UGB	1 year	1	0	0	0	0	0
	20 year	7	2	2	1	1	1
Rainier UGB	1 year	28	12	7	2	3	3
	20 year	352	130	86	30	48	59
Rockaway Beach UGB	1 year	32	7	4	1	12	8
	20 year	538	78	57	21	235	147
Scappoose UGB	1 year	93	37	23	8	11	13
	20 year	1,268	417	302	112	186	252
Seaside UGB	1 year	112	42	25	8	20	17
	20 year	1,570	457	316	114	356	326
St. Helens UGB	1 year	170	71	43	14	20	22
	20 year	2,241	782	539	195	315	410
Tillamook Outside UGB Area	1 year	60	6	10	5	18	21
	20 year	1,194	127	204	96	356	412
Tillamook UGB	1 year	95	41	24	8	11	11
	20 year	1,226	447	298	106	166	210
Vernonia UGB	1 year	20	9	5	2	2	2
	20 year	264	96	63	22	37	45

Oregon Housing Needs Analysis 2026 Production Targets and Adopted Methodology

Northern Coast UGB	Results	Total	0-30% AMI	31-60% AMI	61-80% AMI	81-120% AMI	>120% AMI
Warrenton UGB	1 year	93	38	23	8	12	13
	20 year	1,252	417	295	108	190	241
Wheeler UGB	1 year	5	2	1	0	1	1
	20 year	60	19	12	4	14	11

\*On January 12, 2026, OEA revised this table to correct spreadsheet error

**Figure 28. Southeast Region Results**

Southeast UGBs	Results	Total	0-30% AMI	31-60% AMI	61-80% AMI	81-120% AMI	>120% AMI
Adrian UGB	1 year	2	1	0	0	0	1
	20 year	34	8	5	3	8	11
Bonanza UGB	1 year	3	1	0	0	1	1
	20 year	47	10	7	4	12	15
Burns UGB	1 year	23	8	5	2	3	5
	20 year	349	96	63	34	58	98
Chiloquin UGB	1 year	6	2	1	1	1	1
	20 year	90	22	14	8	19	26
Hines UGB	1 year	13	4	3	1	2	3
	20 year	211	51	35	20	40	64
Jordan Valley UGB	1 year	3	0	0	0	1	1
	20 year	51	4	3	1	25	18
Klamath Falls UGB	1 year	347	119	70	34	46	78
	20 year	5,240	1,429	960	530	814	1,507
Lakeview UGB	1 year	31	10	6	3	5	8
	20 year	482	118	82	46	90	146
Malin UGB	1 year	5	2	1	0	1	1
	20 year	69	19	12	6	13	19
Merrill UGB	1 year	6	2	1	1	1	1
	20 year	88	23	16	9	15	26
Nyssa UGB	1 year	23	7	4	2	3	6
	20 year	356	91	63	35	61	107
Ontario UGB	1 year	146	47	29	15	20	36
	20 year	2,284	583	411	235	359	697
Paisley UGB	1 year	2	1	0	0	1	1
	20 year	37	7	5	3	11	12
Vale UGB	1 year	22	7	4	2	3	6
	20 year	349	86	62	36	57	109

**Figure 29. Southwest Region Results**

Southwest UGBs	Results	Total	0-30% AMI	31-60% AMI	61-80% AMI	81-120% AMI	>120% AMI
Ashland UGB	1 year	221	65	40	22	37	57
	20 year	3,525	779	604	354	678	1,109
Bandon UGB	1 year	50	12	8	4	13	14
	20 year	853	142	117	70	252	272
Brookings UGB	1 year	118	32	20	11	25	31
	20 year	1,915	381	296	174	467	597
Butte Falls UGB	1 year	3	1	0	0	0	1
	20 year	41	10	7	4	8	12
Canyonville UGB	1 year	19	6	4	2	3	5
	20 year	297	74	55	32	46	91
Cave Junction UGB	1 year	22	7	4	2	3	6
	20 year	354	82	64	38	57	113
Central Point UGB	1 year	164	50	32	17	21	43
	20 year	2,595	608	481	284	385	836
Coos Bay UGB	1 year	178	56	34	18	26	44
	20 year	2,775	663	498	289	468	857
Coquille UGB	1 year	37	12	7	4	5	9
	20 year	563	141	102	58	94	169
Drain UGB	1 year	9	3	2	1	1	2
	20 year	129	34	24	14	20	38
Eagle Point UGB	1 year	70	21	13	7	10	19
	20 year	1,131	254	207	123	175	372
Elkton UGB	1 year	2	1	0	0	1	1
	20 year	37	7	5	3	12	11
Glendale UGB	1 year	5	2	1	0	1	1
	20 year	66	19	13	7	9	19
Gold Beach UGB	1 year	37	9	5	3	10	10
	20 year	614	105	80	47	197	186
Gold Hill UGB	1 year	9	3	2	1	1	2
	20 year	140	35	25	14	24	42
Grants Pass UGB	1 year	551	153	104	59	77	157
	20 year	9,031	1,917	1,638	989	1,430	3,057
Jacksonville UGB	1 year	26	8	5	2	4	6
	20 year	406	91	68	40	82	125
Lakeside UGB	1 year	16	3	2	1	5	4
	20 year	266	39	29	16	104	78

Oregon Housing Needs Analysis 2026 Production Targets and Adopted Methodology

Southwest UGBs	Results	Total	0-30% AMI	31-60% AMI	61-80% AMI	81-120% AMI	>120% AMI
Medford UGB	1 year	1,267	347	240	136	178	366
	20 year	20,910	4,372	3,795	2,300	3,297	7,147
Myrtle Creek UGB	1 year	40	14	8	4	5	9
	20 year	595	161	110	62	92	170
Myrtle Point UGB	1 year	18	7	4	2	2	4
	20 year	270	75	50	28	40	76
North Bend UGB	1 year	91	29	18	9	12	23
	20 year	1,412	345	258	150	223	436
Oakland UGB	1 year	6	2	1	1	1	1
	20 year	96	26	18	10	14	28
Phoenix UGB	1 year	42	13	8	4	6	11
	20 year	660	159	122	71	100	208
Port Orford UGB	1 year	16	4	2	1	5	4
	20 year	258	40	28	16	101	73
Powers UGB	1 year	4	1	1	0	1	1
	20 year	54	13	9	5	12	15
Reedsport UGB	1 year	32	10	6	3	6	7
	20 year	496	116	81	46	110	144
Riddle UGB	1 year	8	3	2	1	1	2
	20 year	125	32	24	14	18	38
Rogue River UGB	1 year	27	8	5	3	4	7
	20 year	426	97	77	45	71	137
Roseburg UGB	1 year	373	114	72	39	50	98
	20 year	5,907	1,372	1,083	640	913	1,899
Shady Cove UGB	1 year	21	6	4	2	5	5
	20 year	341	69	52	30	85	104
Sutherlin UGB	1 year	63	20	12	7	8	15
	20 year	964	241	178	103	146	295
Talent UGB	1 year	46	14	9	5	6	12
	20 year	73	166	133	79	119	237
Winston UGB	1 year	58	17	11	6	8	16
	20 year	933	206	171	102	143	311
Yoncalla UGB	1 year	5	2	1	0	1	1
	20 year	74	20	13	7	13	20

\*On January 12, 2026, OEA revised this table to correct spreadsheet error

**Figure 30. Willamette Valley Region Results**

<b>Willamette Valley UGBs</b>	<b>Results</b>	<b>Total</b>	<b>0-30% AMI</b>	<b>31-60% AMI</b>	<b>61-80% AMI</b>	<b>81-120% AMI</b>	<b>&gt;120% AMI</b>
Adair Village UGB	1 year	8	2	2	1	1	2
	20 year	122	29	23	13	21	36
Albany UGB	1 year	488	154	100	50	70	114
	20 year	7,708	1,925	1,474	820	1,271	2,218
Amity UGB	1 year	11	4	2	1	2	3
	20 year	183	45	35	20	30	53
Aumsville UGB	1 year	36	9	7	4	6	10
	20 year	617	127	112	67	110	200
Aurora UGB	1 year	12	3	2	1	2	3
	20 year	208	44	38	23	37	67
Brownsville UGB	1 year	9	3	2	1	1	2
	20 year	137	38	27	14	22	37
Carlton UGB	1 year	17	5	3	2	3	4
	20 year	274	61	50	29	50	83
Coburg UGB	1 year	27	8	5	3	4	7
	20 year	438	101	82	47	75	133
Corvallis UGB	1 year	515	173	108	52	72	111
	20 year	7,895	2,102	1,530	826	1,287	2,150
Cottage Grove UGB	1 year	61	23	13	6	8	11
	20 year	882	267	178	91	131	215
Creswell UGB	1 year	33	11	7	3	4	7
	20 year	488	136	96	51	77	128
Dallas UGB	1 year	155	44	31	16	24	40
	20 year	2,565	580	477	275	445	787
Dayton UGB	1 year	13	5	3	1	2	3
	20 year	198	5	39	21	30	52
Depoe Bay UGB	1 year	15	3	2	1	6	4
	20 year	268	35	27	15	117	74
Detroit UGB	1 year	8	0	0	0	5	2
	20 year	158	4	3	2	108	41
Donald UGB	1 year	9	3	2	1	1	2
	20 year	144	39	28	15	22	39
Dundee UGB	1 year	18	6	4	2	3	4
	20 year	283	74	54	29	49	77
Dunes City UGB	1 year	7	2	1	0	3	1
	20 year	118	19	12	6	55	28

Oregon Housing Needs Analysis 2026 Production Targets and Adopted Methodology

<b>Willamette Valley UGBs</b>	<b>Results</b>	<b>Total</b>	<b>0-30% AMI</b>	<b>31-60% AMI</b>	<b>61-80% AMI</b>	<b>81-120% AMI</b>	<b>&gt;120% AMI</b>
Eugene UGB	1 year	1,676	552	348	171	235	371
	20 year	25,944	6,764	5,003	2,729	4,251	7,196
Falls City UGB	1 year	5	2	1	1	1	1
	20 year	87	21	17	9	15	25
Florence UGB	1 year	86	25	15	7	22	18
	20 year	1,350	292	198	103	418	339
Gates UGB	1 year	3	1	1	0	0	1
	20 year	44	10	8	4	9	13
Gervais UGB	1 year	16	5	3	2	2	4
	20 year	246	63	47	26	40	70
Halsey UGB	1 year	6	2	1	1	1	1
	20 year	85	23	17	9	13	23
Harrisburg UGB	1 year	20	7	4	2	3	4
	20 year	296	82	58	31	46	78
Hubbard UGB	1 year	29	9	6	3	4	7
	20 year	461	115	88	49	77	132
Idanha UGB	1 year	1	0	0	0	0	0
	20 year	17	3	2	1	6	5
Independence UGB	1 year	78	23	16	8	12	20
	20 year	1,282	297	240	137	221	387
Jefferson UGB	1 year	18	6	4	2	2	4
	20 year	276	7	54	29	44	77
Junction City UGB	1 year	64	19	13	7	10	16
	20 year	1,039	248	196	111	177	308
Keizer UGB	1 year	251	79	51	26	36	59
	20 year	3,963	990	758	422	653	1,140
Lafayette UGB	1 year	28	8	6	3	4	8
	20 year	475	104	88	51	83	149
Lebanon UGB	1 year	140	49	30	14	19	28
	20 year	2,092	585	412	218	331	547
Lincoln City UGB	1 year	145	29	18	9	55	34
	20 year	2,511	352	261	143	1,083	672
Lowell UGB	1 year	6	2	1	1	1	1
	20 year	97	25	18	9	19	25
Lyons UGB	1 year	10	3	2	1	2	2
	20 year	164	38	30	17	32	48
McMinnville UGB	1 year	295	95	61	30	42	67
	20 year	4,603	1,177	882	484	766	1,294

Oregon Housing Needs Analysis 2026 Production Targets and Adopted Methodology

<b>Willamette Valley UGBs</b>	<b>Results</b>	<b>Total</b>	<b>0-30% AMI</b>	<b>31-60% AMI</b>	<b>61-80% AMI</b>	<b>81-120% AMI</b>	<b>&gt;120% AMI</b>
Mill City UGB	1 year	13	5	3	1	2	3
	20 year	202	55	39	20	35	52
Millersburg UGB	1 year	73	16	14	8	13	23
	20 year	1,330	240	236	147	247	460
Monmouth UGB	1 year	96	27	19	10	15	26
	20 year	1,609	355	298	174	280	502
Monroe UGB	1 year	4	2	1	0	1	1
	20 year	59	18	12	6	9	14
Mt. Angel UGB	1 year	27	9	6	3	4	6
	20 year	412	107	80	44	66	116
Newberg UGB	1 year	256	73	51	27	39	66
	20 year	4,207	960	785	451	727	1,285
Newport UGB	1 year	115	34	21	10	26	24
	20 year	1,812	407	285	150	500	469
Oakridge UGB	1 year	17	6	3	2	3	3
	20 year	251	67	47	25	47	65
Philomath UGB	1 year	48	14	10	5	7	12
	20 year	783	182	146	83	136	236
Salem UGB	1 year	2,002	650	415	205	280	453
	20 year	31,236	8,030	6,023	3,311	5,075	8,798
Scio UGB	1 year	10	3	2	1	1	2
	20 year	158	36	30	17	27	49
Scotts Mills UGB	1 year	2	1	0	0	0	1
	20 year	39	9	7	4	7	11
Sheridan UGB	1 year	30	10	6	3	4	6
	20 year	451	123	88	47	71	121
Siletz UGB	1 year	7	3	2	1	1	2
	20 year	111	30	22	12	18	29
Silverton UGB	1 year	84	26	17	9	12	20
	20 year	1,330	329	253	141	224	384
Sodaville UGB	1 year	3	1	1	0	0	1
	20 year	40	10	8	4	7	12
Springfield UGB	1 year	466	170	100	47	59	90
	20 year	6,832	1,993	1,365	710	1,041	1,724
St. Paul UGB	1 year	3	1	1	0	0	1
	20 year	44	11	9	5	7	13
Stayton UGB	1 year	68	22	14	7	9	15
	20 year	1,058	271	204	113	171	300

Oregon Housing Needs Analysis 2026 Production Targets and Adopted Methodology

<b>Willamette Valley UGBs</b>	<b>Results</b>	<b>Total</b>	<b>0-30% AMI</b>	<b>31-60% AMI</b>	<b>61-80% AMI</b>	<b>81-120% AMI</b>	<b>&gt;120% AMI</b>
Sublimity UGB	1 year	14	5	3	1	2	3
	20 year	204	59	41	21	31	52
Sweet Home UGB	1 year	60	19	12	6	9	14
	20 year	935	237	178	98	159	264
Tangent UGB	1 year	16	5	3	2	2	4
	20 year	251	64	48	27	41	71
Toledo UGB	1 year	23	8	5	2	3	4
	20 year	336	94	65	34	59	85
Turner UGB	1 year	23	6	4	2	4	6
	20 year	383	83	70	41	68	120
Veneta UGB	1 year	26	9	5	3	4	6
	20 year	397	106	77	41	66	108
Waldport UGB	1 year	18	4	3	1	5	4
	20 year	300	55	41	23	99	82
Waterloo UGB	1 year	1	0	0	0	0	0
	20 year	9	3	2	1	1	2
Westfir UGB	1 year	1	0	0	0	0	0
	20 year	15	4	3	1	3	4
Willamina UGB	1 year	14	4	3	1	2	3
	20 year	222	53	42	24	37	66
Woodburn UGB	1 year	211	70	44	22	29	46
	20 year	3,253	856	630	343	526	898
Yachats UGB	1 year	18	3	2	1	8	5
	20 year	328	35	28	16	159	90
Yamhill UGB	1 year	7	2	1	1	1	2
	20 year	107	28	21	11	17	29

\*On January 12, 2026, OEA revised this table to correct spreadsheet error

## Appendix B. Alternative Counterfactual Metro Region Modeling

### **Alternative Scenario of Metro UGB Housing Needs with Counterfactual Standard OHNA methodology applied to the Metro Region**

As noted on page 20, House Bill 2889 (2023) retains Metro’s statutory responsibility to estimate housing need within the Metro UGB. Metro has discretion on the data sources and specific methods used in the UGR to estimate housing need, but the policy intent is for the UGR methodology to align with OHNA methodology.

Metro updates its UGR every 6-years, with 2024 being the most recent update year. Metro began the update process in early 2024 and adopted the UGR on December 5, 2024. Due to timeline discontinuity between the OHNA methodology development process and Metro’s process, the underlying methods and data sources used to estimate housing need within the Metro UGB differ from OHNA. This discontinuity primarily affects the estimate of regional housing need but also has some feedback loops into local allocation process. This discontinuity could be reconciled if Metro were to update its UGR methodology to align with the OHNA and/or produce an updated calculation of need on or before the 6-year update schedule.

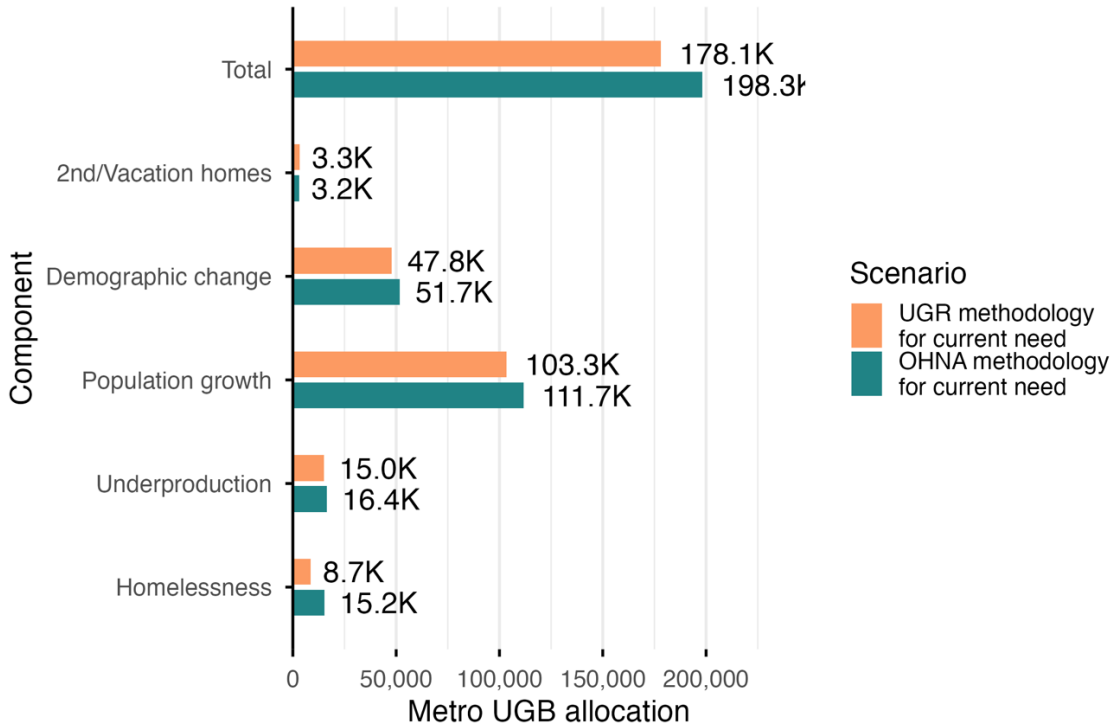
#### ***Differences Between Standard Methodology and Counterfactual applied to Metro region***

A comparison is shown below demonstrating the difference in the estimate of total OHNA Metro Region housing need had Metro’s UGR incorporated the OHNA methodology and sources is provided below for reference use only. The standard OHNA approach is not part of the statutory methodology, and included only to provide some guidance to assist in future planning. A summary discussion of the major differences between methods is also included below.

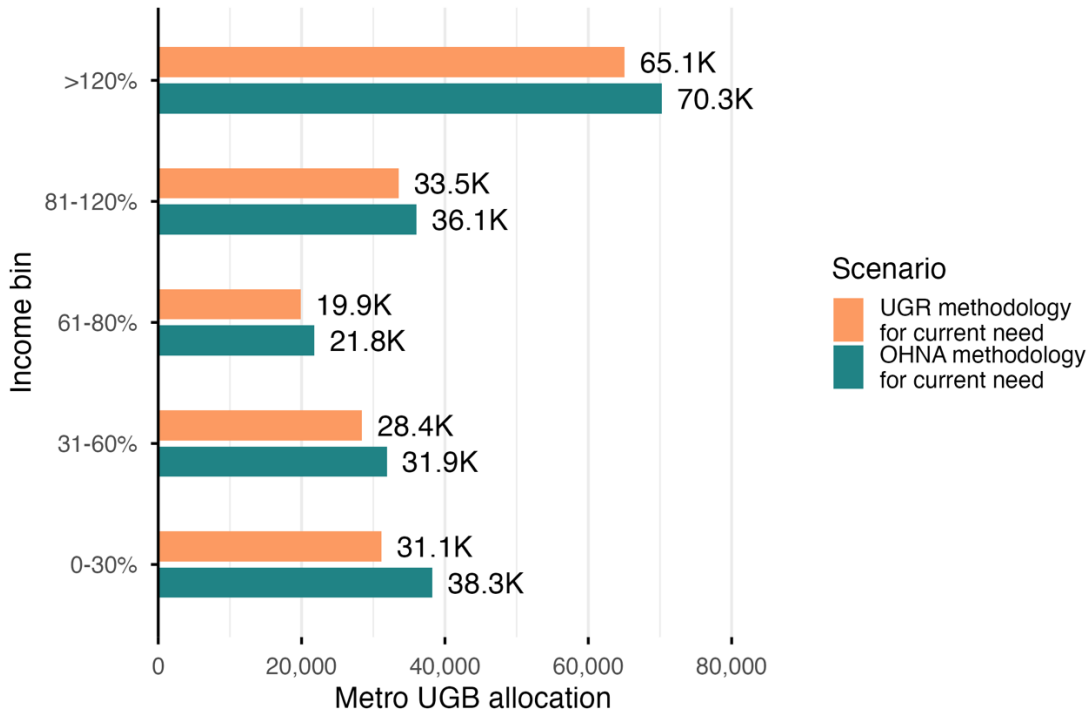
Had Metro’s UGR estimate of regional housing need incorporated the OHNA Methodology for the calculation of total need, the estimate for the Metro UGB (a subset of the Metro Region) would have been 198,300 compared to the statutory estimate of 178,100, a difference of 20,200 units.

The two largest differences between the OHNA Methodology and the Metro UGR methodology are in how to estimate *Underproduction*, and how to estimate *Units Needed for People Experiencing Homelessness*. Given the income distributions of these two components, the majority of the difference between the two methods is contained within the 0-80% AMI household income range.

**Figure 31. Comparison of official Metro UGB allocation vs. non-binding OHNA standard approach by component**



**Figure 32. Comparison of official Metro UGB allocation vs. non-binding OHNA standard approach by income level**



## Appendix C. Common Terms & Acronyms

**AMI: Area Median Income:** Every year the U.S. Department of Housing and Urban Development (HUD) produces a median family income calculation/assessment to determine affordability thresholds for a given area (some geographies are HUD-specific). Affordable housing projects' income limits, rent limits, and other characteristics will be based on this income limit. This term is synonymous with Median Family Income or MFI.<sup>11</sup>

**City:** This report uses the terms "City" and "city with a population of 10,000 or greater" as DLCD does, which includes, regardless of size: (a) Any city within Tillamook County and the communities of Barview/Twin Rocks/Watseco, Cloverdale, Hebo, Neahkahnie, Neskowin, Netarts, Oceanside and Pacific City/Woods; and (b) A county with respect to its jurisdiction over Metro urban unincorporated lands.

**Cost Burdening / Severe Cost Burdening:** The term "cost burdening" refers to households who pay more than 30% of their income on housing costs. The term "severe cost burdening" is used for households paying more than 50% of their income on housing. These terms come from HUD, and include mortgage payments and interest, or rent, utilities, and insurance.

**DAS: Department of Administrative Services**

**DLCD: Department of Land Conservation and Development**

**Goal 10 (Housing):** One of Oregon's 19 statewide land use planning requirements relating to planning for housing need. All local governments are required to plan for housing needs within an urban growth boundary (see term below) under Goal 10. Cities with populations larger than 10,000 people (as well as all cities and certain urban, unincorporated communities in Tillamook County, and counties with urban unincorporated lands in the Metro area) must regularly update local planning documents to comply with Goal 10.

**Goal 14 (Urbanization):** One of Oregon's 19 statewide land use planning requirements relating to planning for the orderly and efficient urbanization of land within an urban growth boundary (UGB - see term below). All cities and Metro are required to establish and amend urban growth boundaries to accommodate identified land needs in compliance with Goal 14.

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<sup>11</sup> A note on AMI vs MFI from HUD: "HUD estimates Median Family Income (MFI) annually for each metropolitan area and non-metropolitan county. The metropolitan area definitions are the same ones HUD uses for Fair Market Rents (except where statute requires a different configuration). HUD calculates Income Limits as a function of the area's Median Family Income (MFI). The basis for HUD's median family incomes is data from the American Community Survey, table B19113 - MEDIAN FAMILY INCOME IN THE PAST 12 MONTHS. The term Area Median Income is the term used more generally in the industry. If the term Area Median Income (AMI) is used in an unqualified manor, this reference is synonymous with HUD's MFI. However, if the term AMI is qualified in some way - generally percentages of AMI, or AMI adjusted for family size, then this is a reference to HUD's income limits, which are calculated as percentages of median incomes and include adjustments for families of different sizes." Source: HUD. 2018. "FY 2018 Income Limits Frequently Asked Questions."  
<https://www.huduser.gov/portal/datasets/il/il18/FAQs-18r.pdf>

**HB: House Bill (year)**

**Housing Affordability:** Housing is considered “affordable” to a household if it spends less than 30% of its gross (pre-tax) income on housing costs (see Cost Burdening).

**HSC: Housing Stability Council:** The advisory body overseeing Oregon Housing and Community Services.

**HUD: U.S. Department of Housing and Urban Development**

**LCDC: Land Conservation and Development Commission:** The governing body with policy and administrative oversight of the state land-use planning program. LCDC is supported by the Oregon Department of Land Conservation and Development.

**Metro UGB: Metro Urban Growth Boundary:** The Portland metropolitan area’s urban growth boundary (UGB), managed by Metro. Within the Metro UGB, cities and counties do not have individual UGBs. Since 1997, Oregon law also requires Metro to maintain a 20-year supply of land for future residential development inside the Metro UGB. See also: UGB.

**OEA: Oregon Office of Economic Analysis**

**OHNA: Oregon Housing Needs Analysis**

**OHCS: Oregon Housing and Community Services**

**PRC: Population Research Center**

**PUMA: Public Use Microdata Area:** A geographic area defined by the U.S. Census Bureau to have roughly 100,000 people and to (typically) align with County boundaries. PUMA sizes vary depending on the population density. Oregon has 31 PUMAs, with most PUMAs located in the more densely populated western part of the state.

**PUMS: Public Use Microdata Sample:** Data files produced by the U.S. Census Bureau that allow users to create custom analyses that are not available through pre-tabulated data tables. These data are produced for PUMA geographies.

**Regulated Affordable Housing:** Housing that is rent- or income-restricted to be affordable to households earning certain incomes. These units typically have public support (funding) in exchange for affordability requirements. Housing is considered “affordable” to a household if it spends less than 30% of its gross (pre-tax) income on housing costs (see Cost Burdening above). Regulations are set according to the types of funding used to develop the housing, such as the Low-Income Housing Tax Credit, or U.S. Housing and Urban Development (HUD) funding. Most regulated affordable housing is affordable for households earning under 60% AMI, but restrictions vary.

**SB: Senate Bill (year)**

**UUL: Urban Unincorporated Lands:** follows the definition in HB4063 (2024), which are lands within the Metro urban growth boundary that are identified by the county as: (a) Not within a city; (b) Zoned for urban development; (c) Within the boundaries of a sanitary district or sanitary authority or a district formed for the purposes of sewage works; (d) Within the service boundaries of a water provider with a water system; and (e) Not zoned with a designation that maintains the land's potential for future urbanization.

**UGB: Urban Growth Boundary:** A boundary delineating urban and urbanizable land from rural land. This boundary contains urban development, is used to plan for orderly growth, and can be amended to accommodate an identified land need. Cities in Oregon are surrounded by urban growth boundaries (UGBs) which designate where they expect to grow over a 20-year period. The Portland metropolitan region has a single regional UGB, established and maintained by Metro. See also: Metro UGB.

**Appendix D. Data Sources and Updates**

The OHNA Final Methodology relies on publicly available data, which are updated and released throughout the calendar year. Figure 33 below lists the variables used throughout the OHNA Final Methodology, their sources, and when they are typically updated.

**Figure 33. Publicly Available Data Sources and Release Schedules**

Category	Component	Data Input	Source	Area	Annual Release Schedule
Many	Regional Income Limits as a Percent of Area Median	AMI levels to allocate units to incomes	HUD	Region	April
Current Need	Underproduction	Total households	Census PUMS for American Community Service (ACS) 1-year estimates	Region	October
		Missing households			
		Total housing units			
		Second and vacation homes			
		Uninhabitable units			
		Rate of cost burdening (to allocate units to income levels)			
	Units Needed for Homelessness	Point-In-Time count	Continuums of Care	Continuums of Care	Varies (annual)
		Homelessness Management Information Systems			
		McKinney-Vento student data	Oregon Dept. of Education	Region	Varies (annual)
		Doubled-up population	Census PUMS	Region	October

Oregon Housing Needs Analysis 2026 Production Targets and Adopted Methodology

Category	Component	Data Input	Source	Area	Annual Release Schedule
Future Need	Units Needed for Population Growth	Population forecasts	PSU	Region	Rotating 4-year cycle for a set of counties and their UGBs
		Number of people living in group quarters	Census PUMS	Region	October
		Average household size			
		Regional income distribution (to allocate units to income levels)			
	Units Lost to Second and Vacation Home Demand	Total housing units	Census PUMS	Region	October
		Units identified as used for “seasonal or recreational purposes”			
		Year built for units identified as used for “seasonal or recreational purposes” (to allocate units to income levels)			
Units Needed for Demographic Change	Population forecasts by age cohort, by region	PSU	Region	Rotating 4-year cycle for a set of counties and their UGBs	

Oregon Housing Needs Analysis 2026 Production Targets and Adopted Methodology

Category	Component	Data Input	Source	Area	Annual Release Schedule
		Number of people living in group quarters	Census PUMS	Region	October
		Average household size			
		Regional income distribution (to allocate units to income levels)			
Allocating Needed Housing	Local Allocation Factor	UGB's current share of regional population	PSU	UGB	Rotating 4-year cycle for a set of counties and their UGBs
		UGB's current share of regional jobs	Census LEHD-LODES	UGB	December
		UGB's current share of regional units identified as used for "seasonal or recreational purposes"	2020 Census	UGB	December
Metro	Metro UGB	Metro's UGR Current and Future Need Totals	Metro UGR	UGB	At least every six years
	Local allocation factor	City's share of UGB's jobs and residents in transit accessible areas	Census LEHD-LODES	City (Metro only)	Variable
	Local allocation factor	City's share of UGB's jobs and residents in transit accessible areas	TriMet GTFS	City (Metro only)	Quarterly

## Oregon Housing Needs Analysis 2026 Production Targets and Adopted Methodology

Category	Component	Data Input	Source	Area	Annual Release Schedule
	Local allocation factor	City's share of UGB's affordable units	HUD CHAS	City (Metro only)	September
	Local allocation factor	City's share of UGB's recent housing production	Metro RLIS	City (Metro only)	Monthly
	Local allocation factor	City's share of residential capacity	Metro UGR	City (Metro only)	At least every six years
	Local allocation factor	City's share of forecast added jobs	Metro Distributed Forecast	City (Metro only)	At least every six years
	Local allocation factor	City's share of current population	ACS	City (Metro only)	Annual
	Local allocation factor	City's share of 2020 vacation units	Census	City	Decennial

Notes: All references to Census PUMS are for 1-year ACS data.

PSU forecasts come from the Population Research Center: <https://www.pdx.edu/population-research/population-forecasts>

LEHD-LODES is the Longitudinal Employer Household Data Origin-Destination Employment Statistics: <https://lehd.ces.census.gov/data/>

TriMet GTFS is the General Transit Feed Specification: <https://developer.trimet.org/GTFS.shtml>

HUD CHAS is the Comprehensive Housing Affordability Survey: <https://www.huduser.gov/portal/datasets/cp.html>

HUD SOCDS is the State of the Cities Data Systems which is calculated from Census Data: <https://www.huduser.gov/portal/datasets/socds.ht>



# City of Stayton

## MEMORANDUM

**TO:** Chairperson Larry McKinley and Planning Commission Members

**FROM:** Jennifer Siciliano, Director of Community and Economic Development

**DATE:** April 27, 2026

**SUBJECT:** Annexation – Kevin and Paige Butler (Shaff Rd)

**120 DAYS ENDS:** Not applicable – Annexation

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### ISSUE

The issue before the Planning Commission is a Public Hearing on an application for Annexation of an approximately 17-acre property located on Golf Lane (Tax Lot 091W03B001500). The applicant proposes annexation into the city limits and application of the High Density (HD) Residential zoning district.

At the February Planning Commission public hearing, a comment letter from the Oregon Department of Land Conservation and Development (DLCD) was entered into the record. The hearing was continued to April 27, 2026, to allow staff to incorporate DLCD's comments into the findings and draft order



### BACKGROUND

The subject property is approximately 17 acres of vacant land, located in Marion County fronting on Shaff Rd, and currently zoned Urban Transition (UT-20). It lies within the Stayton Urban Growth Boundary (UGB) but outside the city limits. The surrounding area consists of a mix of City-zoned and County-zoned properties. The property to the north consists of a large-lot single-family home and is also used for agriculture. The properties to the east were annexed in 2020 and are zoned HD and Commercial General (CG). The HD property is a 100-unit multifamily development. The CG property is vacant. The properties to the south are a vacant 44-acre parcel, zoned Light Industrial and a 1.7-acre parcel not yet annexed, zoned Marion County UT-20 and developed with a

# City of Stayton

single-family dwelling. The property to the west is outside of the Urban Growth Boundary and is a 44-acre parcel zoned Exclusive Farm Use by Marion County. This property is in the same ownership as the subject parcel.

## **ANALYSIS**

Since the prior public hearing, the draft order has been updated to incorporate comments from the Oregon Department of Land Conservation and Development (DLCD) and to reflect current state law. DLCD's comments emphasize that, pursuant to House Bills 2001 and 2889, the City should utilize the Oregon Housing Needs Analysis (OHNA) when evaluating housing needs. The OHNA is a statewide methodology that allocates housing needs to local jurisdictions and requires that need to be accommodated within Urban Growth Boundaries. For the City of Stayton, the OHNA identifies a 20-year housing need of 1,058 dwelling units across a range of income levels.

This represents a shift from the City's prior reliance on the Buildable Lands Inventory, as the OHNA incorporates not only projected future growth but also existing unmet housing need resulting from underproduction. As a result, the analysis supporting this annexation has been updated to reflect the City's obligation to plan for and accommodate a broader range of housing types and affordability levels.

In addition to the OHNA framework, state housing law has evolved in a way that directly affects how residential zoning must be considered. Under current law, duplexes are now permitted on all residentially zoned parcels in cities of Stayton's size. This includes properties zoned Low Density (LD), Medium Density (MD), and High Density (HD). As a result, duplexes are also now permitted in the High Density Residential zone, where they were not previously allowed. This change reduces the distinction between residential zones in terms of allowed housing types and shifts the focus more toward overall capacity and density.

Based on these changes, the prior rationale for recommending Low Density zoning—primarily to limit housing type and intensity—is no longer supported by state. Instead, the City must ensure that its zoning designations provide sufficient capacity to meet identified housing needs under the OHNA framework. The High Density (HD) Residential zone, which allows a broader range of housing types and densities, better aligns with this requirement and supports the City's ability to accommodate its allocated housing needs.

Staff has also revised the draft order to reflect guidance from the City Attorney regarding annexations. Annexations are legislative decisions that must be approved or denied based on applicable criteria and should not include conditions of approval.

Overall, the revised draft order reflects DLCD's comments, incorporates the Oregon Housing Needs Analysis (OHNA), aligns with current state housing law. These updates result in a change to Staff's recommendation from Low Density (LD) Residential zoning to High Density (HD) Residential zoning.

## **RECOMMENDATION**

Staff recommends that the Planning Commission approve the annexation and recommend application of High Density (HD) Residential zoning to the subject property. This represents a change from the prior recommendation of Low Density zoning and is based on the updated analysis incorporating DLCD comments, the Oregon Housing Needs Analysis (OHNA), and current state housing law.

# City of Stayton

## OPTIONS AND SUGGESTED MOTIONS

Staff has provided the Planning Commission with a number of options, each with an appropriate motion. The Community and Economic Development Department recommends the first option to continue the hearing as the applicant requested.

**1. Approve the application, adopting the draft order of recommendation as presented.**

I move the Stayton Planning Commission recommend the application for Annexation for Kevin and Paige Butler for a 17-acre property on Shaff Rd (Tax Lot 091W03B001500), (Land Use File #10-08/25) and adopt the draft order of recommendation as presented by Staff.

**2. Approve the application, adopting modifications to the draft order of recommendation.**

I move the Stayton Planning Commission to recommend the application for Annexation for Kevin and Paige Butler for a 17-acre property on Shaff Rd (Tax Lot 091W03B001500), (Land Use File #10-08/25) and adopt the draft order of recommendation with the following changes...

**3. Continue the hearing until May 26, 2026.**

I move the Stayton Planning Commission continue the public hearing on the application for Annexation for Kevin and Paige Butler for a 17-acre property on Shaff Rd (Tax Lot 091W03B001500), (Land Use File #10-08/25) until May 26, 2026.

**4. Deny the application, directing staff to modify the draft order of recommendation.**

I move the Stayton Planning Commission to recommend denial of the application for Annexation for Kevin and Paige Butler for a 17-acre property on Shaff Rd (Tax Lot 091W03B001500), (Land Use File #10-08/25) and direct staff to modify the draft order of recommendation to reflect the Planning Commission's discussion and bring a revised draft order of recommendation for Planning Commission approval at the May 26, 2026 meeting.

**5. Close the hearing but keep the record open for submission of written testimony.**

I move the Stayton Planning Commission close the hearing on the application for Annexation for Kevin and Paige Butler for a 17-acre property on Shaff Rd (Tax Lot 091W03B001500), (Land Use File #10-08/25) but maintain the record open to submissions by the applicant until May 4, allowing 7 days for review and rebuttal and then an additional 7 days for the applicant to reply, with final closure of the record on May 26, 2026.

**6. Close the hearing and record, and continue the deliberation to the next meeting.**

I move the Stayton Planning Commission continue the deliberation on the application for Annexation for Kevin and Paige Butler for a 17-acre property on Shaff Rd (Tax Lot 091W03B001500), (Land Use File #10-08/25) until May 26, 2026.

**BEFORE THE STAYTON PLANNING COMMISSION**

In the matter of  
the application of  
Kevin and Paige Butler

)  
) Annexation  
) File # 10-08/25  
)

**ORDER OF RECOMMENDATION**

**I. NATURE OF APPLICATION**

The applicant has submitted an application for annexation of a 17-acre parcel of land fronting Shaff Road (tax lot 091W04C001901), proposing a zoning designation of High Density (HD) Residential.

**II. PUBLIC HEARING**

A public hearing was held on the application before the Stayton Planning Commission on February 23, 2026. At that hearing the Planning Commission reviewed Land Use File #10-08/25 application for annexation and it was made part of the record. A comment letter from the DLCDC was received on February 23, 2026. In order to incorporate the DLCDC’s comments into the findings and evaluate any potential impacts, the public hearing was continued to April 27, 2026.

**III. FINDINGS OF FACT**

**A. EXISTING CONDITIONS**

1. The owner of the property is Kevin Butler and the applicants are Kevin and Paige Butler.
2. The parcel can be described as: taxlot 091W04C001901.
3. The property is currently outside of the City Limits and zoned Marion County Urban Transition (UT-20).
4. The property is approximately 17 acres with frontage on Shaff Rd, frontage along the Salem Ditch, and is currently vacant.
5. The property is designated Residential by the Comprehensive Plan Map with a 100-foot wide Natural Resource Overlay District along the Salem Ditch.
6. The property to the north has not been annexed into the City, remains under Marion County jurisdiction, is zoned Urban Transition (UT-20), and is an 11-acre parcel used for a single-family residence and agriculture. The properties to the east were annexed into the City in 2020, are zoned HD and Commercial General and are developed with a multifamily development and vacant, respectively. One of the properties to the south, across Shaff Rd is zoned Light Industrial, is vacant except for a storage shed, and is used for agriculture. The other property across Shaff Rd is has not been annexed into the City, remains under Marion County

jurisdiction, is zoned Urban Transition (UT-20), and is a 1.7-acre parcel used for a single-family residence. The property to the west is outside of the Urban Growth Boundary and is a 44-acre parcel zoned Exclusive Farm Use by Marion County.

## B. PROPOSAL

The proposal is to annex a 17-acre parcel of land fronting Shaff Rd (tax lot 091W04C001901) into the city. The applicant has proposed that High Density (HD) Residential zoning be applied at the time of annexation.

## C. AGENCY COMMENTS

The following agencies were notified of the proposal: City of Stayton Public Works, Stayton Cooperative Telephone Company, Pacific Power, NW Natural Gas, Stayton Fire District, Marion County Public Works, Wave Broadband, Marion County Planning Division, Santiam Water Control District, Santiam Hospital, Stayton Police Department, City of Salem Development Services, and the North Santiam School District. Additionally, a Post Acknowledgement Plan Amendment (PAPA) was submitted to Oregon Department of Land Conservation and Development (DLC) for notice file no. 002-26.

Stayton Public Works provided a memorandum dated December 10, 2025, authored by the City's consultant engineer. In addition, the City's transportation engineering consultant submitted comments during the preapplication phase and had no further review comments during the application process. Santiam Water Control District submitted comments expressing concern over stormwater impacts on the Salem Ditch. These comments are incorporated into the findings below.

City of Salem replied they were not impacted by the application. Stayton Fire District stated that they had no comment. Marion County Public Works stated that they did not have any comment at this time, but they will at time of development. No other review comments were received.

The Santiam Water Control District (SWCD) also submitted comments not directly related to stormwater impacts or to the approval criteria. The SWCD raised the issue of Statewide Planning Goal 6 and the obligation of the City to assure that future development complies with state and federal environmental statutes and rules. The statewide planning goals are applicable to the development of the City's comprehensive plan and land use regulations, not the individual application of the land use regulations to a specific land use or limited land use project. The Comprehensive Plan and Title 17 have been acknowledged and found consistent with the statewide planning goals.

The SWCD requested that the City's approval of this application include conditions that protect the SWCD's compliance with the Total Maximum Daily Load requirements. This application is solely for the annexation of property into the city limits and not for development approval. Bringing the property into the city limits will not impact the TMDL responsibilities of the SWCD or the City.

The SWCD raised the issue that the application did not accurately identify the property to be annexed, due to the SWCD's maintenance easement and use rights encumbering the

property. The applicant provided a copy of the recorded partition plat that established the parcel to be annexed. The annexation of the property into the city limits will not have any impact on the SWCD's easement rights. The existence of easements does not need to be part of the legal description of the territory to be annexed.

The SWCD noted the responsibility of the City to coordinate its planning responsibilities with other units of government, including the SWCD. The City has complied with this requirement by including the SWCD in the drafting of the Comprehensive Plan in 2011 through 2013, the drafting of the Stormwater Master Plan, the drafting of the Public Works Design Standards, and by notifying the SWCD of this application and requesting their input.

The SWCD raised a concern over the potential loss of their water rights due to conversion of the property from agricultural use to urban development. This issue is not related to an approval criterion and is beyond the control of the City.

The SWCD, finally, raised the issue their contract with the applicant to deliver irrigation water. The SWCD requested the applicant sign a Termination of Contract as part of the annexation process. This issue is not related to an approval criterion and is beyond the control of the City.

The City received a letter from the Oregon Department of Land Conservation and Development dated February 23, 2026, stating that, pursuant to Oregon House Bill 2001 and Oregon House Bill 2889, the City should utilize the Oregon Housing Needs Analysis allocations established for each local government. The letter indicates that, pursuant to the January 1, 2026 publication, the City of Stayton's 20-year housing need within the Urban Growth Boundary is 1,058 dwelling units, distributed across income categories as follows: 271 units at 0–30% Area Median Income (AMI); 204 units at 31–60% AMI; 113 units at 61–80% AMI; 171 units at 81–120% AMI; and 300 units above 120% AMI. Additionally, a virtual meeting with DLCD was held on March 26, 2026, to further discuss and clarify their comments.

#### D. PUBLIC COMMENTS

The Community and Economic Development Department notified all owners of property within 300 feet of the subject property and has received no public comment on the application prior to the public hearing.

#### E. ANALYSIS

Annexation applications are required to satisfy approval criteria contained within Stayton Municipal Code (SMC) Title 17, Section 17.12.210.

#### F. REVIEW CRITERIA

Pursuant to SMC 17.12.210.4 the following criteria must be demonstrated as being satisfied by the application:

a. *Need exists in the community for the land proposed to be annexed.*

Finding: The 2013 Stayton Comprehensive Plan update included a Buildable Lands Inventory (BLI). The 2013 BLI provides the following information on projected growth and need for additional land in the community. At that time, there were 106 acres of vacant buildable land inside the City limits in the Low, Medium, and High Density Residential Zones. The projected population for the City in 2030 (at a medium growth rate of 1.7%) was 11,359 people, requiring an additional 1,281 dwellings. To meet that need, the City Comprehensive Plan indicates the expected need of additional 320 acres of residential to be annexed into the City. Since the time that analysis was conducted, the City has annexed 60 acres of residential land.

The need for 1,281 additional units was broken up into 889 single-family detached dwellings, 193 duplexes, 174 multi-family units, and 25 mobile homes. It is projected that the percentage of homes are needed at the following: single-family detached dwellings 65%, duplexes (or attached single-family homes) 13%, multi-family units 18%, and mobile homes 4%.

Since the BLI has been calculated, the following is a table of developments, year, type of housing unit, and number.

Project Name	Year	Type	Number
Phillips Estates, Phase 2	2014	single-family home	21
Phillips Estates, Phase 3	2025/26	single-family home	22 (concept)
Wildlife Meadows	2017	single-family home	42 (2 duplexes)
Hayden (Lambert Place)	2020	single-family home	51
Fern Ridge	2022	multi-family	72
East Santiam Duplexes	2023	duplexes	18 (9 duplexes)
Shaff Square	2023	multi-family	100

Based on these totals, Stayton’s housing needs are as follows: 753 single-family homes, 182 duplex or attached single-family units, 2 multifamily units, and 25 mobile homes.

These projections are based on a higher anticipated growth rate than what has actually occurred, meaning the calculated housing needs may be somewhat overstated. From 2000 to 2025, Stayton’s population increased from 6,816 to 8,280—a change of 1464 people—reflecting an average annual growth rate of approximately 0.86%. The Marion County Coordinated Growth projection of 1.6% average annual growth rate was used in the projected needs.

The City’s Comprehensive Plan Housing Goal (Chapter 6) states: “Existing and future residents will be provided a choice of housing types in safe and healthful housing.” While the City currently provides a range of housing types, application of the High Density (HD) Residential zone to the subject property would further expand those opportunities. The HD zone permits single-family attached dwellings, duplexes, and multi-family dwellings (four + units per building), with a minimum density of 13 dwelling units per acre.

The applicant has not submitted a conceptual plan. On a gross basis consistent with HD standards, the approximately 17-acre site could accommodate a minimum of 221 dwelling units, consistent with the minimum density of 13 units per acre. Although the applicant did not submit a conceptual plan, the application did include an engineering analysis based on development at 24 units per acre, or a total of 408 multifamily units.

In 2023, the State adopted a new methodology for determining housing needs through the Oregon Housing Needs Analysis (OHNA). Under ORS 197A.018, “needed housing” is defined as housing by affordability level, type, characteristics, and location necessary to accommodate a city’s allocated housing need over the applicable 20-year planning period. The OHNA represents a shift from a locally derived housing needs analysis to a statewide, regionally informed methodology that accounts for both future growth and existing unmet need resulting from underproduction of housing.

As described in the Department of Administrative Services (DAS) January 1, 2026, methodology, housing need now includes both projected future demand and existing unmet need, including suppressed household formation due to housing costs and limited supply. The methodology allocates a share of regional housing need to each local government. Stayton is located within the Willamette Valley region, and, consistent with state policy, urban housing needs are to be accommodated within Urban Growth Boundaries.

The DAS 2026 analysis identifies a 20-year housing need within Stayton’s Urban Growth Boundary of 1,058 dwelling units, distributed across income levels as follows: 271 units at 0–30% Area Median Income (AMI); 204 units at 31–60% AMI; 113 units at 61–80% AMI; 171 units at 81–120% AMI; and 300 units above 120% AMI

Analysis: Under the State’s revised methodology, housing needs include both existing unmet needs resulting from underproduction and projected future demand, which is allocated at the regional level and accommodated within Urban Growth Boundaries by local jurisdictions.

This annexation would increase the City’s supply of buildable residential land and capacity, supporting its ability to provide a range of housing types and accommodate identified housing needs consistent with the City’s Comprehensive Plan Housing Goal, Statewide Planning Goal 10, ORS 197.296, and the OHNA framework.

*b. The site is or is capable of being serviced by adequate City public services, including such services as may be provided subject to the terms of a contract annexation agreement between the applicant and the City.*

Finding: The property is not currently connected to City utilities. Three of the City’s adopted master plans (Transportation, Water, and Wastewater) provide clear pathways for extending services. The adopted Stormwater master plan indicates that a stormwater detention facility is proposed for construction on this property. At the time of development, the applicant will be required to construct or extend

infrastructure to meet all applicable standards, ensuring the property can be fully and adequately served.

#### Streets

Shaff Road, which forms the southern boundary of the property, is designated as a Major Collector and will need to be improved to Collector standards, including curbs, sidewalks, street trees, street lighting, and adequate pavement width. In addition, the preliminary design of the future roundabout at the intersection of Shaff Road and Golf Club Road identifies a potential 44-foot wide easement area outside the public right-of-way for Pacific Power transmission lines, for a large storm drainage conveyance swale, and an additional easement for a large stormwater facility located at the southeasterly corner of the parcel. Emergency vehicle access will need to comply with the Stayton Municipal Code, Public Works Design Standards, and Fire District requirements at the time of development.

#### Stormwater Drainage

The property is located within the North Salem Ditch Basin for purposes of the City's stormwater design and analysis. The applicant's engineering memo states that both public and private storm systems are planned to discharge into the Salem Ditch with a 30-inch outfall. The City's engineering consultant has stated that the nearest existing storm drain manhole is approximately 400 feet east of the property and on the south side of Shaff Rd. The preliminary design of the future roundabout at the Shaff Rd/Golf Club Rd intersection identifies the need for a large storm drainage conveyance swale along the north side of Shaff Rd. The City's engineer consultant noted that Salem Ditch is not considered to have any available capacity for increased runoff or flows. The engineer consultant also pointed out that there is a wetland along the Salem Ditch as well as significant hydric soils running north to south through the middle of the property.

The Santiam Water Control District (SWCD) is the owner and operator of the Salem Ditch. In a December 10, 2025 communication the SWCD raised a number of concerns with the application. SWCD has stated that a property owner may not discharge stormwater into the Salem Ditch without SWCD approval. SWCD has stated that the Salem Ditch is at capacity and further development, without controls, will cause facility damage, flooding, and water quality degradation. The City and the SWCD entered into a Memorandum of Understanding in 2014 regarding stormwater discharges into SWCD facilities, including the Salem Ditch. Following execution of the MOU, the City amended the stormwater control sections of the City's Public Works Design Standards (Division 6) to restrict stormwater discharges from development to no more than predevelopment discharge rates, and for some design storms at less than the predevelopment discharge rate, to require downstream capacity analysis, and to prohibit new discharge points into a SWCD facility without a written approval from the SWCD.

SWCD also asserts that it holds use rights to the property and that the city must recognize and must incorporate these use rights and the corresponding appropriate setbacks into development plans. The Comprehensive Plan map provides for a 100-

foot wide Natural Resources Overlay District (NROD) along the Salem Ditch, which, when implemented, would prohibit any new buildings within the NROD.

No development is proposed with this application. At development, a complete stormwater management system—including flow control, water-quality treatment, conveyance, and an acceptable point of discharge—will be required in accordance with the Municipal Code, the Stormwater Master Plan and Public Works Design Standards.

#### Water

The property is not currently served by the City's water system. The applicant's engineering memo states that the property can be served by water and points out improvements and extensions of the system called for in the 2006 Water Distribution Facilities Planning Study. The City's engineering consultant has stated that the nearest City water facility is a 10-inch main located in Wilco Road, approximately 400 feet east of the property. The Water Master Plan includes a future 10-inch water main along Shaff Rd and a 12-inch distribution main along Salem Ditch along the western portion of the property. At the time of development, the property will be required to extend the water system and meet all emergency water supply and fire flow requirements.

#### Sanitary Sewer

The property is not currently served by the City's sewer system. The applicant's engineering memo states that serving the property is feasible by connection to a sewer stub at the intersection of Golf Club Rd and Shaff Rd. The City's engineering consultant has stated that connection will require engineering analysis demonstrating adequate capacity for additional flows. The Wastewater Facilities Planning Study does not identify significant system deficiencies in the vicinity that would affect the ability to serve the site.

*c. The proposed annexation is property contiguous to existing City jurisdictional limits.*

Finding: The property is adjacent to the City limits to the south and east.

*d. The proposed annexation is compatible with the character of the surrounding area and complies with the urban growth program and the policies of the City of Stayton.*

Finding: One of the properties to the east is zoned Commercial General (CG) and is not yet developed. The other property to the east was recently developed as a 100-unit multifamily development with a 20-unit density per acre. The properties to the south are vacant land zoned industrial and 2-acre single family dwelling site. To the west, property is outside of the Stayton Urban Growth Boundary and is agricultural land. To the north, is land not yet annexed into the city and is a large lot residential property also used for agriculture.

The property lies within the Stayton Urban Growth Boundary and is designated Residential in the Comprehensive Plan. Applying any residential zone upon

annexation matches that designation and maintains consistency with the planned future character of the area. With the recent new construction of multi-family and duplex developments in the City, development of the property as HD would extend the high density residential area and provide a transition to the commercial area – Commercial General (CG) – directly adjacent to this parcel.

*e. The annexation request complies or can be made to comply with all applicable provisions of state and local law.*

Finding: The criteria of ORS 222 apply to the adoption of an annexation ordinance which is a City Council action. The property owners have consented to the annexation. The property is contiguous to the existing city limits and is located entirely within the City of Stayton’s Urban Growth Boundary. The acknowledged Stayton Comprehensive Plan designates this area as Residential.

*f. If a proposed contract annexation, the terms and conditions, including the cost of City facility and service extensions to the annexed area shall be calculated by the Public Works Director.*

Finding: The proposed annexation is not a contract annexation.

#### **IV. CONCLUSION**

Based on the facts above, the Planning Commission concludes that the application meets the requirements for Sections 17.12.210.4 Annexation Approval Criteria.

#### **V. RECOMMENDATION**

Based on the Findings and Conclusions above, the Planning Commission recommends approval of the application for annexation to the City Council and amendment of the Official Zoning Map to designate the property as Low Density Residential with a 100-foot wide Natural Resources Overlay District along the Salem Ditch.

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Larry McKinley, Chairperson

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Date

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Jennifer Siciliano,  
Community and Economic Development Director

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Date