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Clackamas County
www.clackamas.us

CLACKAMAS COUNTY

PLANNING & ZONING DIVISION

DEPARTMENT OF TRANSPORTATION AND DEVELOPMENT

DEVELOPMENT SERVICES BUILDING
150 BEAVERCREEK ROAD OREGON CITY, OR 97045

CLACKAMAS COUNTY BOARD OF COMMISSIONERS
2051 Kaen Road, Oregon City
BCC Hearing Room - 4th Floor

LAND USE HEARING
December 1, 2026
1:30 pm

The item will not begin before time noted. Interested parties may appear and be heard during the testimony phase of any hearing at the above address. If a hearing is set for decision only, the evidence phase has been completed, so interested parties may no longer be heard. Applications or comments may be inspected, and calls or correspondence directed to: Planning & Zoning Division, 150 Beavercreek Road, Oregon City, OR 97045, (503) 742-4500.

HEARING

File No.: **ZDO-296, Z0411-26: City of Canby Urban Growth Boundary Expansion**

Applicants: City of Canby

Proposal: Planning file #s Z0411-26 & ZDO-296 ("ZDO-296") include a legislative amendment the Clackamas County Comprehensive Plan to adopt an expanded urban growth boundary(UGB) for the City of Canby, as identified below on page 2. The city has proposed to add approximately 512.3 acres of land to the city's UGB to accommodate expected residential and employment land needs for the next 20 years, including 73.1 acres for residential uses, 25.7 acres for park uses, and 413.5 acres for employment uses..

Staff Contact: Martha Fritzie, Principal Planner, MFritzie@clackamas.us; Jennifer Hughes, Planning Director, JenniferH@clackamas.us

Clackamas County Planning and Zoning Division
Department of Transportation and Development
Development Services Building
150 Beavercreek Road | Oregon City, OR 97045
503-742-4500 | zoninginfo@clackamas.us
www.clackamas.us/planning

Land Use Hearing Item
Staff Report to the Board of County Commissioners

File Numbers: ***Z0411-26 & ZDO-296: Adoption of an Expansion of the City of Canby's Urban Growth Boundary (UGB)***

Staff Contact: Martha Fritzie, Principal Planner (mfritzie@clackamas.us)

Board of County Commissioners' Hearing Date: December 1, 2026

PROPOSAL:
Planning file #s Z0411-26 & ZDO-296 ("ZDO-296") include a legislative amendment the Clackamas County Comprehensive Plan to adopt an expanded urban growth boundary (UGB) for the City of Canby, as identified below on page 2. The city has proposed to add approximately 512.3 acres of land to the city's UGB to accommodate expected residential and employment land needs for the next 20 years, including:

- 73.1 acres for residential uses;
- 25.7 acres for park uses; and
- 413.5 acres for employment uses.

This proposal is a result of the analyses summarized in this report and the Planning Commission staff report (attached) and detailed in the city's application materials (*Exhibit 1*), along with public outreach that was conducted between 2023 and 2026.

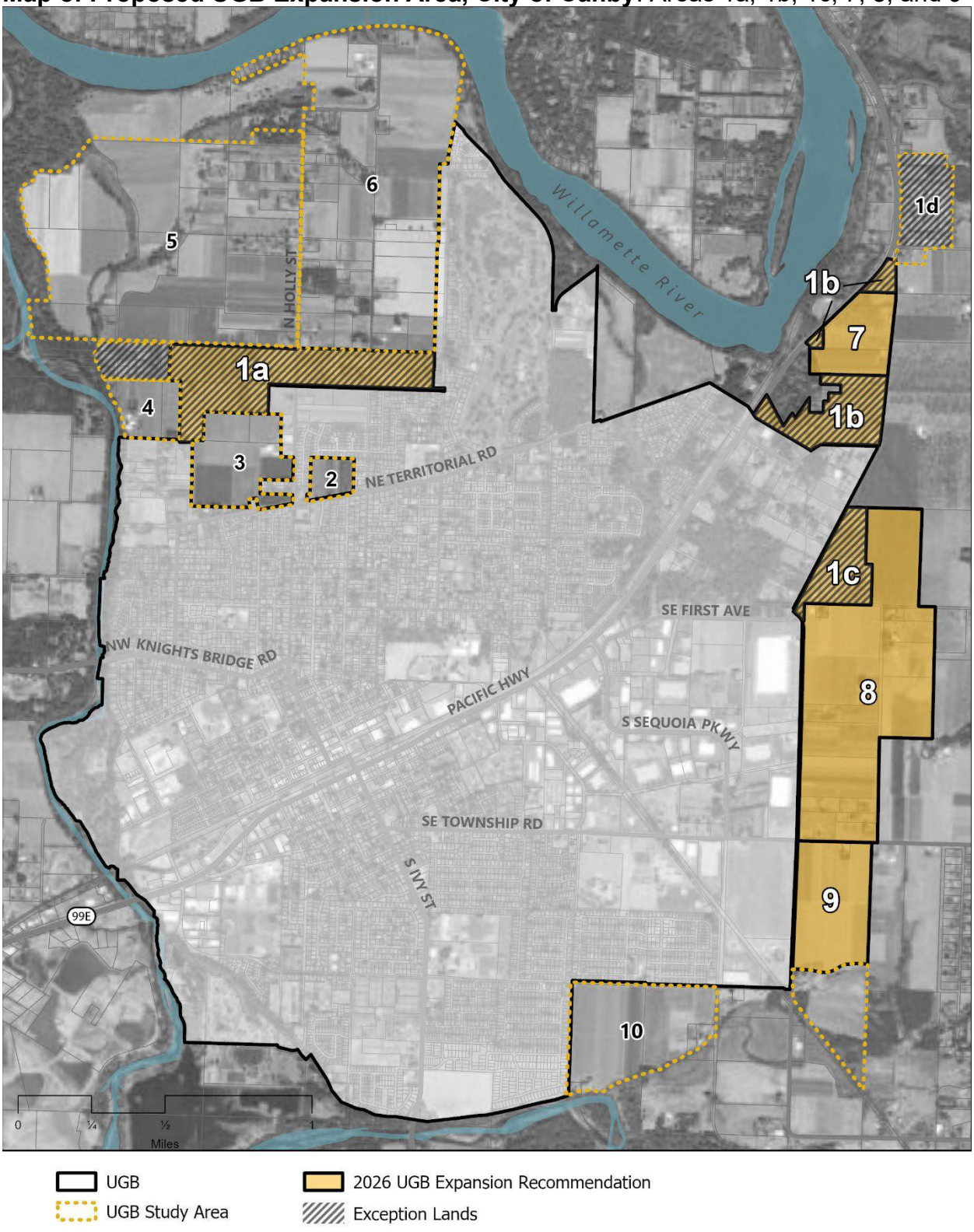
Approval of ZDO-296 would not change the Comprehensive Plan or zoning designations of affected properties until such time as the property or properties annex into the city. The city's expanded UGB would necessitate amendments to the following maps in the County's Comprehensive Plan, so as to accurately reflect the new boundary: Maps 4-7; 4-9; 5-1; 5-2b; 5-4b; 5-5; 5-8b; 5-9b; 5-9d; 5-10; 5-11e; and 5-12b.

ZDO-296 would also amend Appendix B, *Background Documents*, which includes the various sources and documents used in the preparation of the Comprehensive Plan policies and goals. The amendment would add the September 2026, *City of Canby Urban Growth Boundary Expansion Report* to Appendix B of the Clackamas County Comprehensive Plan.

These amendments are requested by the City of Canby. Per OAR 660-018-0021, the establishment of an urban growth boundary must be agreed on and mutually adopted by city and the county prior to submittal to the state for acknowledgement. On October 7, 2026, the city council, with a unanimous vote, adopted the amended UGB contained in this proposal;

the city submitted an application to the county for consideration of the proposal shortly thereafter.

Map of Proposed UGB Expansion Area, City of Canby: Areas 1a; 1b; 1c; 7; 8; and 9



Source: City's application narrative (Exhibit 1)

Background:
Statewide Planning Goals require cities to provide a twenty-year supply of buildable land within urban growth boundaries (UGBs). The last time the City of Canby's UGB was amended was over 40 years ago – in 1981.

The proposal in ZDO-296 is the result of over three years of work. In 2023, the City of Canby initiated an expansion of its UGB through the sequential UGB process, as allowed under Oregon Administrative Rule (OAR) 660-025-0185 and Oregon Revised Statutes (ORS) 197.626(3). This process allows for a city to adopt and have the state acknowledge an Economic Opportunities Analysis (EOA) and Housing Needs Analysis (HNA) in advance of an UGB expansion.

The city of Canby's adopted *Economic Opportunities Analysis (EOA)* and a *Housing Needs Analysis (HOA)* both concluded that the city's current UGB is not sufficient to accommodate 20 years of growth, as required by state law. In total, the studies identified a need for up to 538 additional acres of land within the UGB.

- Canby's 2023 Economic Opportunities Analysis (EOA) was adopted in 2023 and identifies a deficit of up to 439.2 acres to meet employment land needs.

- The city's Housing Needs Analysis (HNA) was adopted in 2024 and identifies a need an additional 73.1 acres of residential land within the city's UGB. While the HNA identified a greater need, some of the need will be accommodated within the existing UGB due to "efficiency measure" undertaken by the city, including rezoning of some lands to accommodate more housing development.

- The city also identified a need of 25.7 acres for parks based, in part, on expected population growth and the city's 10 acres per 1,000 residents' aspirational level of service (LOS) in the adopted 2022 Comprehensive Parks and Recreation Master Plan and in the adopted 2026 Canby Comprehensive Plan.

Following adoption of these studies, the city began an evaluation of properties both inside and outside the existing UGB to determine how to best accommodate the identified deficit, or need. Land inside the UGB was assessed to determine if there were areas that could be used more "efficiently." Land outside the UGB was assessed to determine which would be the best to include within the UGB and eventually urbanize. This analysis must be evaluated based on priorities identified in state law. Since Canby does not have an urban reserve, the first priority lands for the city to consider including are non-resource and exception lands. Agricultural lands may only be considered if higher priority lands are not sufficient to accommodate the need.

The proposed UGB expansion includes 512.3 acres, which will accommodate all of the residential need (required under state law) and most of the employment land need (accommodating all of this need is not required, but encouraged under state law). It affects 512.3 acres of land in unincorporated Clackamas County, including:

- 183.1 acres of exception land, zoned RRFF5 (Rural Residential Farm Forest); and
- 329.2 acres of agricultural land, zoned EFU (Exclusive Farm Use).

RELATED PRIOR BCC ACTION:

In September 2023, the Board authorized a letter of support for the city to pursue the "sequential UGB process" in their pursuit to analyze the adequacy of the city's urban growth boundary.

PLANNING COMMISSION ACTION:

The Planning Commission (PC) held a public hearing on ZDO-296 on November 9, 2026, before voting on a recommendation to the Board. Two parties provided testimony at the PC hearing, both in support of the proposal. After discussion, the PC voted unanimously (9-0) to recommend approval of ZDO-296 and Z0411-26, as proposed.

CPO AND HAMLET RECOMMENDATIONS:

All the County's CPOs and Hamlets were sent notice of this proposal on October 5, 2026. To date, no CPO or Hamlet has provided comments.

To date, Planning and Zoning has received only one written comment, from the Department of Land Conservation and Development (DLCD). The comment (*Exhibit 2*) was submitted to ensure its inclusion in the record but is related to city requirements for future wetland delineations and does not affect the process or review criteria for the county. Written comments and a summary of verbal testimony provided to the city during their adoption process are included in the city's application materials (*Exhibit 1*).

SIGNIFICANT ISSUES:

None. Several Planning Commissioners commended the city on their public outreach efforts.

STAFF RECOMMENDATION:

Staff recommends approval of ZDO-296 & Z0411-26, as proposed.

ZDO–296 & Z0411-26:

CITY OF CANBY URBAN GROWTH BOUNDARY (UGB)AMENDMENT

CLACKAMAS COUNTY

Board of County Commissioners Public Hearing
December 1, 2026

PROPOSAL

- Legislative Comprehensive Plan amendment
- Maps 4-7; 4-9; 5-1; 5-2b; 5-4b; 5-5; 5-8b; 5-9b; 5-9d; 5-10; 5-11e; and 5-12b
  - Amended only to accurately reflect new boundary
- Appendix B, Background Documents
  - *City of Canby Urban Growth Boundary Expansion Report (Sept. 2026)*

BACKGROUND

- Statewide Planning Goals require 20-year supply of buildable land within urban growth boundaries (UGBs)
- 2023-2024: Background work, need for additional land
  - Economic Opportunities Analysis (EOA), 2023; and
  - Housing Needs Analysis (HNA), 2024
    - Adopted and acknowledged
  - Parks & Recreation Master Plan, 2022
- 2024-2026: Urban Growth Boundary Analysis
  - Land inside UGB – efficiency measures, rezoning
  - Land outside UGB – expansion, **this proposal**

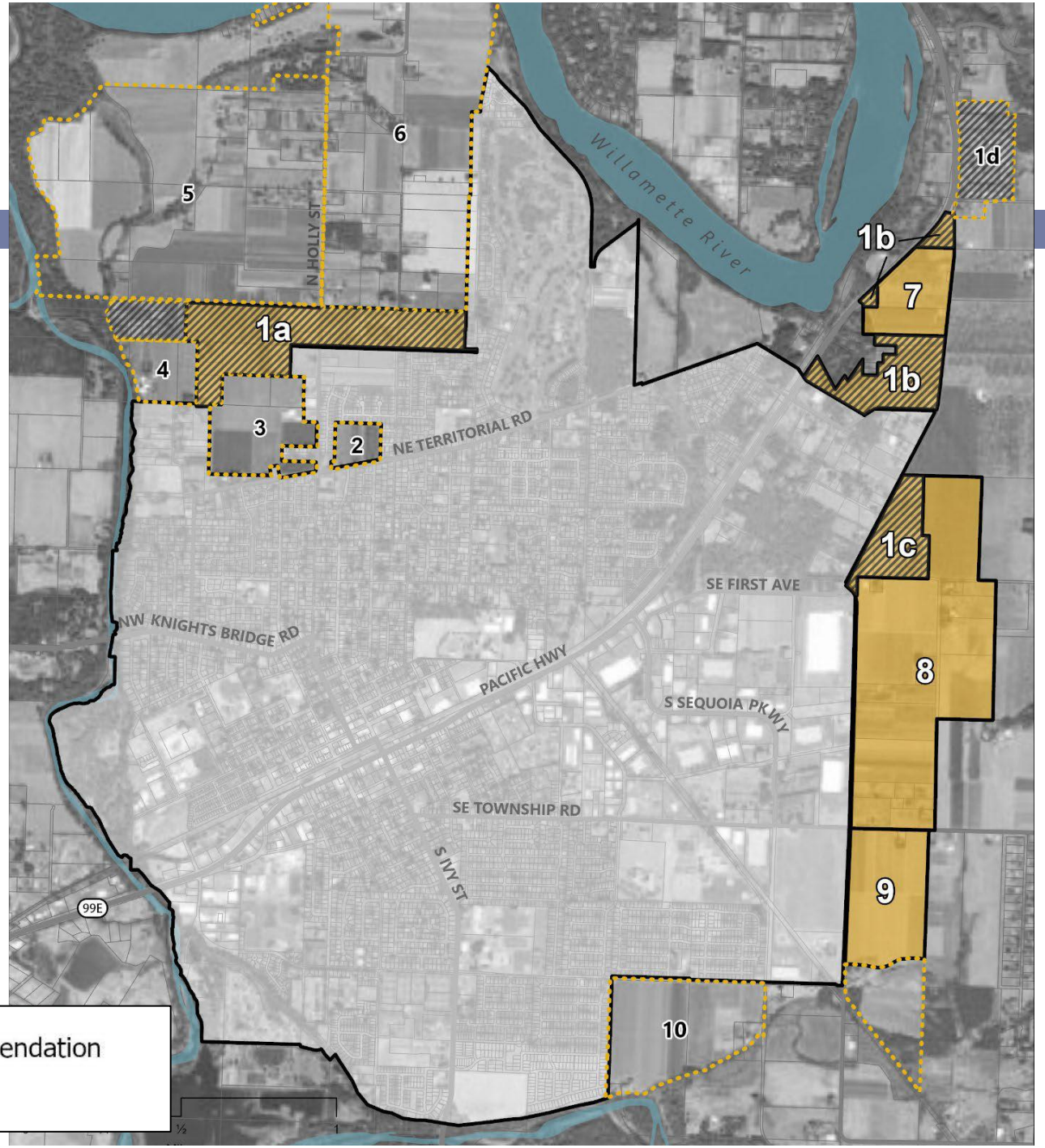
BACKGROUND (cont.)

- Public outreach/workshops
- Advisory Committees (TAC and PAC)
  - Included county staff
- Public hearings (Planning Commission and City Council)
  - Adopted October 7, 2026
  - Unanimous vote

Per OAR 660-018-0021, the establishment of a UGB must be agreed on and mutually adopted by city and the county prior to submittal to the state for acknowledgement

MAP OF PROPOSAL

- Areas 1a; 1b; 1c; 7; 8; and 9 on map
- Total of 512.3 acres
  - 183.1 acres “exception lands”
  - 329.2 acres agricultural land



SUMMARY OF LANDS TO BE ADDED

Land Use	Land Need	UGB Expansion Recommendation	
		Gross Acres	**Unconstrained Acres**
Residential	73.1 acres	73.1 acres	73.1 acres
Parks	25.7 acres	25.7 acres	25.7 acres
Employment	439.2 acres	413.5 acres	389.6 acres
TOTAL	**538.0 acres**	**512.3 acres**	**488.4 acres**

RELEVANT PLANNING GOALS AND POLICIES

Statewide Planning Goals	County Comprehensive Plan
▫ Goal 1: Citizen Involvement ▫ Goal 2: Land Use ▫ Goal 9: Economics ▫ Goal 10: Housing ▫ Goal 14: Urbanization	▫ Chapter 4 - Land Use: Urbanization Policies; Rural Reserves Policies ▫ Chapter 11 - The Planning Process

All relevant requirements of Statewide Planning Goals, ORS and OARs and county Comprehensive Plan policies are met

SWP GOAL 14

- Goal 14, *Urbanization* (OAR 660-024)
  - Delineate study area, exclude Rural Reserve, other constrained areas
  - Priorities for inclusion
    1. Urban reserve, exception land, and non-resource land
    2. Marginal lands (none in Clackamas County)
    3. Farm and forest land, not high value soils
    4. Agricultural land, high value soils
  - Apply Goal 14 "location factors"

- All exception lands considered first, not enough to accommodate all growth
- Agricultural land (last priority) included only after exception lands exhausted
- The city's Goal 14 area analysis supports inclusion of the specific areas proposed

PLANNING COMMISSION

- Public hearing November 9, 2026
- Oral testimony from two members of public
  - Both in support of proposal
- Recommended approval of ZDO-296 & Z0411-26, as proposed
  - Unanimous vote (9-0)

STAFF RECOMMENDATION

- Recommend approval of ZDO-296 & Z0411-26, as proposed
  - Comprehensive Plan amendments necessary to adopt the proposed expansion of the City of Canby UGB

CLACKAMAS
COUNTY

Clackamas County Planning and Zoning Division
Department of Transportation and Development

Development Services Building
150 Beavercreek Road | Oregon City, OR 97045

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www.clackamas.us/planning

STAFF REPORT TO THE PLANNING COMMISSION

TO: Clackamas County Planning Commission

FROM: Martha Fritzie, Principal Planner (mfritzie@clackamas.us)

DATE: November 2, 2026

HEARING DATE: November 9, 2026

RE: Planning File #s Z0411-26 & ZDO-296: Adoption of an Expansion of the City of Canby's Urban Growth Boundary (UGB)

PROPOSAL

Planning file #s Z0411-26 & ZDO-296 ("ZDO-296") include a legislative amendment the Clackamas County Comprehensive Plan, which would adopt an expanded urban growth boundary (UGB) for the City of Canby, as identified below on page 2. The city has proposed an addition of approximately 512.3 acres of land to the city's UGB to accommodate expected residential and employment land needs for the next 20 years, including:

- 73.1 acres for residential uses;
- 25.7 acres for park uses; and
- 413.5 acres for employment uses.

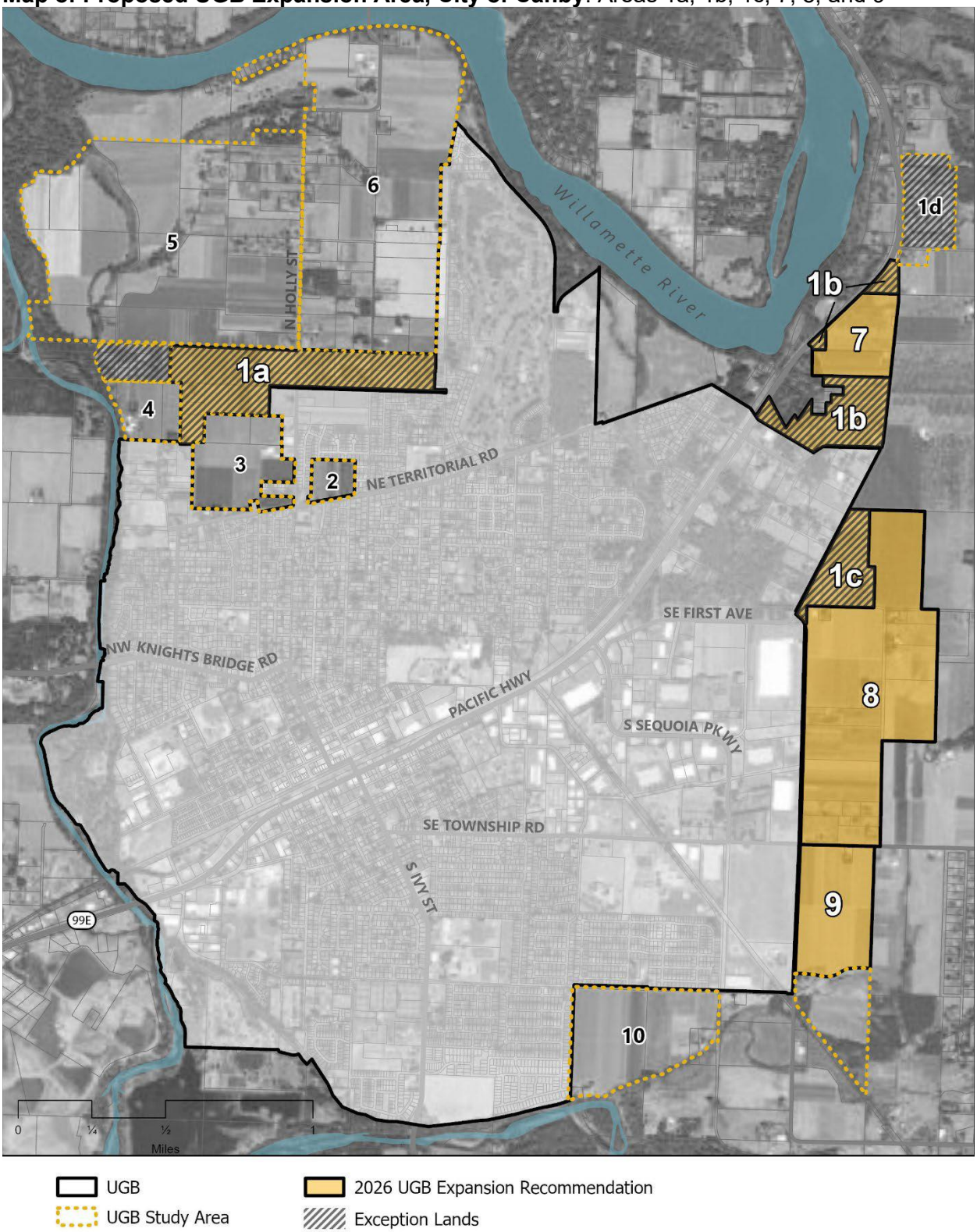
This proposal is a result of the analysis summarized in this report and detailed in the city's application materials (Attachment 3, Exhibit 1), along with public outreach that was conducted between 2023 and 2026.

Approval of ZDO-296 would not change the Comprehensive Plan or zoning designations of any of these properties until such time as a property or properties annex into the city. The city's expanded UGB would necessitate amendments to the following maps in the County's Comprehensive Plan, so as to accurately reflect the new boundary: Maps 4-7; 4-9; 5-1; 5-2b; 5-4b; 5-5; 5-8b; 5-9b; 5-9d; 5-10; 5-11e; and 5-12b.

ZDO-296 would also amend Appendix B, *Background Documents*, which includes the various sources and documents used in the preparation of the Comprehensive Plan policies and goals. The amendment would add the September 2026, *City of Canby Urban Growth Boundary Expansion Report* to Appendix B of the Clackamas County Comprehensive Plan (Attachment 2).

These amendments are requested by the City of Canby. Per OAR 660-018-0021, the establishment of an urban growth boundary must be agreed on and mutually adopted by city and the county prior to submittal to the state for acknowledgement. On October 7, 2026, the city council, with a unanimous vote, adopted the amended UGB contained in this proposal; the city submitted an application to the county for consideration of the proposal shortly thereafter.

Map of Proposed UGB Expansion Area, City of Canby: Areas 1a; 1b; 1c; 7; 8; and 9



Source: City's application narrative (Attachment 3, Exhibit 1)

BACKGROUND

Statewide Planning Goals require cities to provide a twenty-year supply of buildable land within urban growth boundaries (UGBs). The last time the City of Canby's UGB was amended was over 40 years ago – in 1981.

The proposal in ZDO-296 is the result of over three years of work. In 2023, the City of Canby initiated an expansion of its UGB through the sequential UGB process, as allowed under Oregon Administrative Rule (OAR) 660-025-0185 and Oregon Revised Statutes (ORS) 197.626(3). This process allows for a city to adopt and have the state acknowledge an Economic Opportunities Analysis (EOA) and Housing Needs Analysis (HNA) in advance of an UGB expansion.

The city of Canby's adopted *Economic Opportunities Analysis (EOA)* and a *Housing Needs Analysis (HOA)* both concluded that the city's current UGB is not sufficient to accommodate 20 years of growth, as required by state law. In total, the studies identified a need for up to 538 additional acres of land within the UGB.

- Canby's 2023 Economic Opportunities Analysis (EOA) was adopted in 2023 and identifies a deficit of 439.2 acres to meet employment land needs through 2043.

- The city's Housing Needs Analysis (HNA) was adopted in 2024 and identifies a need an additional 73.1 acres of residential land within the city's UGB. While the HNA identified a greater need, some of the need will be accommodated within the existing UGB due to "efficiency measure" undertaken by the city, including rezoning of some lands to accommodate more housing development.

- The city also identified a need of 25.7 acres for parks based, in part, on expected population growth and the city's 10 acres per 1,000 residents' aspirational level of service (LOS) in the adopted 2022 Comprehensive Parks and Recreation Master Plan and in the adopted 2026 Canby Comprehensive Plan.

Following adoption of these studies, the city began an evaluation of properties both inside and outside the existing UGB to determine how to best accommodate the identified deficit, or need. Land inside the UGB was assessed to determine if there were areas that could be used more "efficiently." Land outside the UGB was assessed to determine which would be the best to include within the UGB and eventually urbanize. This analysis must be evaluated based on priorities identified in state law. Since Canby does not have an urban reserve, the first priority lands for the city to consider including are non-resource and exception lands. Agricultural lands may only be considered if higher priority lands are not sufficient to accommodate the need.

The proposed UGB expansion includes 512.3 acres, which will accommodate all of the residential need (required under state law) and most of the employment land need (accommodating all of this need is not required, but encouraged under state law). It affects 512.3 acres of land in unincorporated Clackamas County, including approximately:

- 183.1 acres of exception land, zoned RRFF5 (Rural Residential Farm Forest); and
- 329.2 acres of agricultural land, zoned EFU (Exclusive Farm Use).

This proposal is a result of the analyses summarized in this report and detailed in the city's application materials, along with a robust public outreach process that was conducted between 2023 and 2026. The city conducted public outreach, public workshops, information provided on their website, and public hearings.

PUBLIC NOTICE & COMMENTS

Notice of the proposed amendments in ZDO-296 was sent to:

- All cities within the County;
- All County Community Planning Organizations (CPOs) and Hamlets;
- Oregon Department of Land Conservation & Development (DLCD), Metro, Oregon Department of Transportation (ODOT), and other interested agencies; and
- An interested parties list, specific to legislative land use proposals in the county.

Notice was also published in the newspaper and online. To date, Planning and Zoning has received only one written comment, from the Department of Land Conservation and Development (DLCD.). The comment (Attachment 3, Exhibit 2) was submitted to ensure its inclusion in the record but is related to city requirements for future wetland delineations and does not affect the process or review criteria for the county. Written comments and a summary of verbal testimony provided to the city during their adoption process are included in the city's application materials (Attachment 3, Exhibit 1).

ANALYSIS & FINDINGS

The proposed Comprehensive Plan amendments are legislative in nature. Section 1307 of the County's Zoning and Development Ordinance (ZDO) establishes review procedures for legislative amendments.

This proposal is subject to the relevant Statewide Planning Goals, Oregon Revised Statutes (ORS) and Oregon Administrative Rules (OARs) and County Comprehensive Plan (Plan) policies. Compliance with the relevant portions of each is discussed in subsections 1 through 3, below.

1. Statewide Planning Goals:

Goal 1 – *Citizen Involvement*:
Goal 1 calls for "the opportunity for citizens to be involved in all phases of the planning process" and requires the County to have a citizen involvement program with certain features.

ZDO-296 does not propose any change to the *Citizen Involvement* chapter (Chapter 2) of the County's Comprehensive Plan.

ZDO Section 1307 implements policies of Comprehensive Plan Chapter 2 and contains adopted and acknowledged procedures for citizen involvement and public notification of land use applications. Notice of ZDO-296 has been provided consistent with the requirements of Section 1307, including to DLCD, all cities in the County, and all active and recognized CPOs and Hamlets at least 35 days before the first public hearing. Notice of the proposal and its scheduled hearings was published in *The Oregonian* at least 10 days in advance of the first hearing and has also been posted on County websites. Before a final decision on ZDO-296 can be made, there will have been at least two public hearings: one before the Planning Commission and another before the Board of County Commissioners.

In addition, the city conducted public engagement throughout their entire process. The application materials summarize their outreach efforts as follows:

The proposed UGB, which the City has chosen to develop in tandem with a Comprehensive Plan update and Transportation System Plan (TSP) update, has involved over three years of public engagement activities. These have included public meetings, workshops, open houses, tabling at public events, a robust notification scheme, and online engagement tools such as surveys. Citizen involvement activities have included materials and meetings catering to the Spanish-speaking community and have emphasized the scheduling of regular check-ins with opportunities for in-person, two-way communication. With the UGB expansion specifically, the planning process has included interactive mapping exercises where members of the community could express their preferences and ideas related to land use patterns, community character, circulation, recreation, and other topics. Public engagement has been partially overseen by a Project Advisory Committee (PAC), which comprised of elected and appointed officials, community leaders, business owners, and other stakeholders. The urban growth boundary process included, 11 community conversations, 5 community tabling events, 7 community summits (one in Spanish), 7 Project Advisory Committee Meetings, 3 Technical Advisory Committee meetings, 7 on-line questionnaires, 3 Listening Sessions, and dozens of planning commission and city council work sessions.

These processes ensure any interested parties have ample opportunity to participate in this planning process.

This proposal is consistent with Goal 1.

Goal 2 – *Land Use Planning*:
Goal 2 requires the County to have and to follow a comprehensive land use plan and implementing regulations. Comprehensive Plan provisions and regulations must be consistent with Statewide Planning Goals. Goal 2 also provides a process by which exceptions can be made to certain Goals.

ZDO-296 does not propose to change the county's land use planning process. The county will continue to have a comprehensive land use plan and implementing regulations that are consistent with the plan. No exceptions from the Goals are required.

Goal 2 requires coordination with affected governments and agencies. Notice of this application has been provided to potentially affected agencies and governments. Goal 2 also requires that all land use actions be consistent with the acknowledged Comprehensive Plan. The background information and findings provided by the applicant and within this report provide an adequate factual base for rendering an appropriate decision consistent with the county Comprehensive Plan.

This proposal is consistent with Goal 2.

Goal 3 – *Agricultural Lands*:
Pursuant to OAR 660-024-0020(1)(b), Goal 3 is not applicable to the UGB amendment process.

Statewide Planning Goal 3 is not applicable.

Goal 4 – *Forest Lands*:
Pursuant to OAR 660-024-0020(1)(b), Goal 4 is not applicable to the UGB amendment process.

Statewide Planning Goal 3 is not applicable.

Goal 5 – *Natural Resources, Scenic and Historic Areas, and Open Spaces*:
ZDO-296 does not propose to change the county's Plan policies or implementing regulations for Goal 5 open spaces, scenic and historic areas, and natural resources. Pursuant to OAR 660-024-0020, Goal 5 and related rules under OAR Chapter 660, division 23, apply only areas added to the UGB, except as required under OAR 660-023-0070 and 660-023-0250. The staff has reviewed these provisions and finds that neither is applicable.

Until such time as the lands with Goal 5 resources are annexed into the city, the county's existing designations and protections will remain in place.

This proposal is consistent with Goal 5.

Goal 6 – *Air, Water and Land Resources Quality*:
Goal 6 instructs the County to consider the protection of air, water, and land resources from pollution and pollutants when developing its Comprehensive Plan.

ZDO-296 does not include any changes to the county's Comprehensive Plan policies or implementing regulations or maps affecting Goal 6 resources. Further, as noted in the city's findings, the lands brought into the UGB will retain their existing zoning until annexed into the city in the future. Upon annexation and the application of city zoning designations to those lands, the city will evaluate Goal 6 to determine if any additional regulations are necessary to satisfy the goal beyond those that exist in the city's plan and development code.

This proposal is consistent with Goal 6.

Goal 7 – *Areas Subject to Natural Hazards*:
Goal 7 requires the County's Comprehensive Plan to address Oregon's natural hazards.

The proposed amendments do not propose to change the county's Plan or implementing regulations regarding natural disasters and hazards. The lands brought into the UGB and will retain their existing zoning until annexed into the city in the future.

Upon annexation and the application of city zoning designations to those lands, the city will evaluate Goal 7 to determine if any additional regulations are necessary to satisfy the goal beyond those that exist in the city's plan and development code.

This proposal is consistent with Goal 7.

Goal 8 – *Recreational Needs*:
Goal 8 requires relevant jurisdictions to plan for the recreational needs of their residents and visitors. ZDO-296 does not propose to change the county's Plan or implementing regulations regarding recreational needs.

City recreation needs are addressed in the application and inclusion of land to accommodate the identified need for additional park lands within the city are included in the proposal.

This proposal is consistent with Goal 8.

Goal 9 – *Economic Development*:
This Goal is intended to ensure the Comprehensive Plan contributes to a stable and healthy economy in all regions of the state. Goal 9 requires the County to provide an adequate supply of land for commercial and industrial development. Goal 9 also requires jurisdictions to provide for an adequate supply of sites of suitable sizes, types, locations and services for a variety of industrial and commercial uses consistent with Plan policies.

While this proposal would not change the Comprehensive Plan or zoning designation of any property or supply of employment land in the unincorporated areas of the county, it would support Goal 9 by enabling land to be available for future employment growth in the city.

Per OAR 660-009-0015 an Economic Opportunities Analysis (EOA) acts as the framework for economic policy and land use decisions. The city is utilizing its adopted 2023 EOA to provide the basis for employment lands expansion. The city's EOA projects a demand for approximately 6,700 additional jobs between 2023 and 2043. To meet this projected demand, the EOA concludes that existing UGB does not contain sufficient employment lands to meet the City's employment needs to 2043 and up to approximately 439.2 acres of additional industrial and commercial land is needed within the UGB to meet this demand.

The proposal would add 413.5 gross acres (389.6 net, unconstrained acres) of employment lands into the city's UGB to accommodate this identified need.

The city's EOA has been acknowledged by DLCD and therefore has been determined to be completed consistent with the methodology required by OAR 660-009-0015.

This proposal is consistent with Goal 9.

Goal 10 – *Housing*:
The purpose of Goal 10 is to meet housing needs. This goal requires local jurisdictions to provide for an adequate number of housing units and to encourage the efficient use of buildable land within urban growth boundaries. OAR 660-008 provides the standards for determining compliance with Goal 10.

While this proposal would not change the Comprehensive Plan or zoning designation of any property or supply of residential land in the unincorporated areas of the county, it would support Goal 10 by enabling land to be available for future residential growth in the city.

The city's 2024 Housing Needs Analysis (HNA) concluded the existing UGB did not contain sufficient land to meet the City's housing needs for the next 20 years, noting the following:

> *The HNA includes a buildable land inventory (BLI), evaluates population and housing trends, and identifies policies aimed at providing adequate land within the UGB to accommodate 20 years of population growth. The adopted HNA determined that 73.1 acres of additional residential lands are needed, and these are proposed to be accommodated in Subarea 1A (exception lands) of the UGB study area.*

The sizing of the residential urban growth boundary also included housing efficiency measures in the adopted Housing Needs Analysis (2024) and Housing Production Strategy (2026), and included comprehensive plan changes for 56.8 Acres.... With these measures 73.1 acres of urban growth boundary housing need was determined.

The city's Goal 14 analysis found that the specific areas proposed for inclusion in the UGB are most appropriate in terms of efficiency of service provision for residential uses.

The HNA has also been acknowledged by DLCD and therefore have been determined to be completed consistent with the methodology required Goal 10 and OAR 660-008.

This proposal is consistent with Goal 10.

Goal 11 – *Public Facilities and Services*:
The purpose of Goal 11 is to ensure that local governments plan and develop a timely, orderly, and efficient arrangement of public facilities and services to act as a framework for urban and rural development.

ZDO-296 does not propose to change the county's Plan or implementing regulations regarding public facilities and services.

This proposal is consistent with Goal 11.

Goal 12 – *Transportation*:
Goal 12 is implemented by Oregon Administrative Rules (OAR) Chapter 660, Division 12. Local governments are required to adopt a transportation system plan (TSP) and land use regulations to implement the TSP. This proposal does not include amendments to the County's TSP or transportation-related land use regulations.

OAR 660-012-0060 also requires any comprehensive plan and land use regulation amendment to be evaluated according to the terms outlined in that OAR to demonstrate whether they will have a significant impact on the transportation system.

However, per OAR 660-024-0020(d), *the transportation planning rule requirements under OAR 660-012-0060 need not be applied to a UGB amendment if the land added to the UGB is zoned as urbanizable land, either by retaining the zoning that was assigned prior to inclusion in the boundary or by assigning interim zoning that does not allow development that would generate more vehicle trips than development allowed by the zoning assigned prior to inclusion in the boundary.*

All of the properties that would be included in Canby's UGB would retain their current county Comprehensive Plan and zoning designations until such time as they annex into the city. At the time of annexation, the city would initiate the required procedures to adopt and implement a city zoning designation.

This proposal is consistent with Goal 12.

Goal 13 – *Energy Conservation*:

Goal 13 encourages land use plans to consider lot size, building height, density, and other measures in order to help conserve energy. The proposed amendments would not change any policy or implementing regulation regarding energy conservation.

This proposal is consistent with Goal 13.

Goal 14 – *Urbanization*:
The purpose of Goal 14 is to provide for an orderly and efficient transition from rural to urban land use, to accommodate urban population and urban employment inside urban growth boundaries, to ensure efficient use of land, and to provide for livable communities.

Per state law, urban growth boundaries must be established to identify and separate urbanizable land from rural land. Establishment and change of the boundaries must be based on consideration of a number of factors, including:

1. Demonstrated need to accommodate 20 years of housing, employment opportunities, and associated infrastructure;
2. Orderly and economic provision for public facilities and services;
3. Maximum efficiency of land uses within the existing urban area;
4. Environmental, energy, economic and social consequences;
5. Retention of agricultural land, with Class I agricultural soils being the highest priority for retention and Class VI the lowest priority; and
6. Compatibility of the proposed urban uses with nearby agricultural activities.

The rules for an urban growth boundary assessment are found in OAR 660-024. The city's 2026 *Urban Growth Boundary Expansion Report* serves and the basis for this proposal and contains the detailed analyses completed to assess the potential expansion areas as set forth in OAR 660-024.

As is detailed in the *Urban Growth Boundary Expansion Report*, the ensuing analysis of how to accommodate the identified need, included two main components:

- an analysis of efficiency measures within the existing UGB, which resulted in the changing of the zoning designations of several properties within the city; and
- an analysis of lands outside the UGB for potential inclusion, which resulted in this proposal.

Once the need was established, the city created a preliminary study area where all lands within a one-and-a-half-mile radius were considered for the expansion of the UGB. After excluding certain lands from the preliminary study area that were not appropriate for an urban level of service or use, the final study area contained 1,555 acres. The city then followed State rules to prioritize lands within the study area for inclusion in the proposed UGB expansion.

OAR 660-024-0067 details the process for evaluating land within the identified study area for potential inclusion in the expanded UGB and identifies the priority of land for inclusion in a UGB, including:[1]

1. Urban reserve, exception land, and nonresource land;
2. Marginal lands designated pursuant to ORS 197.247;
3. Farm and forest land; and,
4. Agricultural land.

[1] In 2026, this list was expanded to 6 priorities by splitting two of the categories into separate priority levels. Because the city's analysis was initiated prior to this rule change, state law allows for the city to proceed under the rules that were in place at the time of initiation, which are reflected here.

There are approximately 239 gross acres of first priority lands within the city's study area, less than the identified land deficit of 538 acres. Therefore, the city needed to consider lower priority lands (farmland) for inclusion.

After substantial analysis within the identified study area, including consideration for the relative costs to provide needed infrastructure, parcels sizes, location and proximity to existing transportation facilities and existing UGB, existence of constraints and natural hazards, and compatibility with agricultural/forest activities in the area, the city identified the properties in this proposal for inclusion into the UGB as those that would best meet the criteria to ensure efficient and orderly future development. The proposal includes the following:

Land Use	Land Need	UGB Expansion Recommendation	
		Gross Acres	Unconstrained Acres
Residential	73.1 acres	73.1 acres	73.1 acres
Parks	25.7 acres	25.7 acres	25.7 acres
Employment	439.2 acres	413.5 acres	389.6 acres
TOTAL	**538.0 acres**	**512.3 acres**	**488.4 acres**

Source: Table33.Urban Growth Boundary Expansion Report

Staff has reviewed the city's analyses and finds that the city's Goal 14 analysis and conclusions comply with the applicable rules and standards.

This proposal is consistent with Goal 14.

Goal 15 – *Willamette River Greenway*:
The purpose of Goal 15 is to "protect, conserve, enhance, and maintain the natural, scenic, historical, agricultural, economic, and recreational qualities of lands along the Willamette River as the Willamette River Greenway."

This proposal does not propose to change the county's Plan or implementing regulations regarding the Willamette River Greenway, and, although located relatively close to the Willamette River, no portion of land in this proposal is within the Willamette River Greenway.

This proposal is consistent with Goal 15.

Goals 16-19:
These four Statewide Planning Goals address estuarine resources, coastal shorelands, beaches and dunes, and ocean resources, respectively, and are **not applicable to Clackamas County**.

2. Clackamas County's Comprehensive Plan (Plan)

Staff finds that the following three chapters of the County's Comprehensive Plan contain policies that are applicable to this proposal.

Chapter 2 – *Citizen Involvement*: Chapter 2 aims to promote public participation in the County's land use planning. Its policies largely focus on the County's Community Planning Organization (CPO) program and methods for informing and involving the public. Chapter 2 includes these specific policies:

2.A.1 – Require provisions for opportunities for citizen participation in preparing and revising local land use plans and ordinances. Insure opportunities for broad representations, not only of property owners and Countywide special interests, but also of those persons within the neighborhood or areas in question.

2.A.6 – Seek citizens' input not only through recognized community organizations, but also through service organizations, interest groups, granges, and other ways.

2.A.13 – Insure that the County responds to citizen recommendations through appropriate mechanisms and procedures.

Consideration of ZDO-296 has proceeded according to the noticing and public hearing requirements of ZDO Section 1307, which implements Chapter 2 of the Plan.

This proposal is consistent with Chapter 2.

Chapter 4 – *Land Use*: Chapter 4 generally includes goals and policies for how land in Clackamas County should be designated and zoned, and goals and policies for what land uses should be allowed in those designations and their implementing zoning districts.

ZDO-296 does not propose to change the Comprehensive Plan land use designation or zoning district of any property; properties located in the UGB expansion area would ~~not~~ remain under county zoning until such time as the properties are annexed to the city. But this Chapter does contain several policies related to urbanization and rural reserves that are relevant to this proposal.

4.A.2 Coordinate with affected cities in designating urban areas outside of Metro. Land designated as a Rural Reserve, as shown on Map 4-9, shall not be designated as an Urban Reserve or added to an urban growth boundary. The following areas may be designated as Urban:

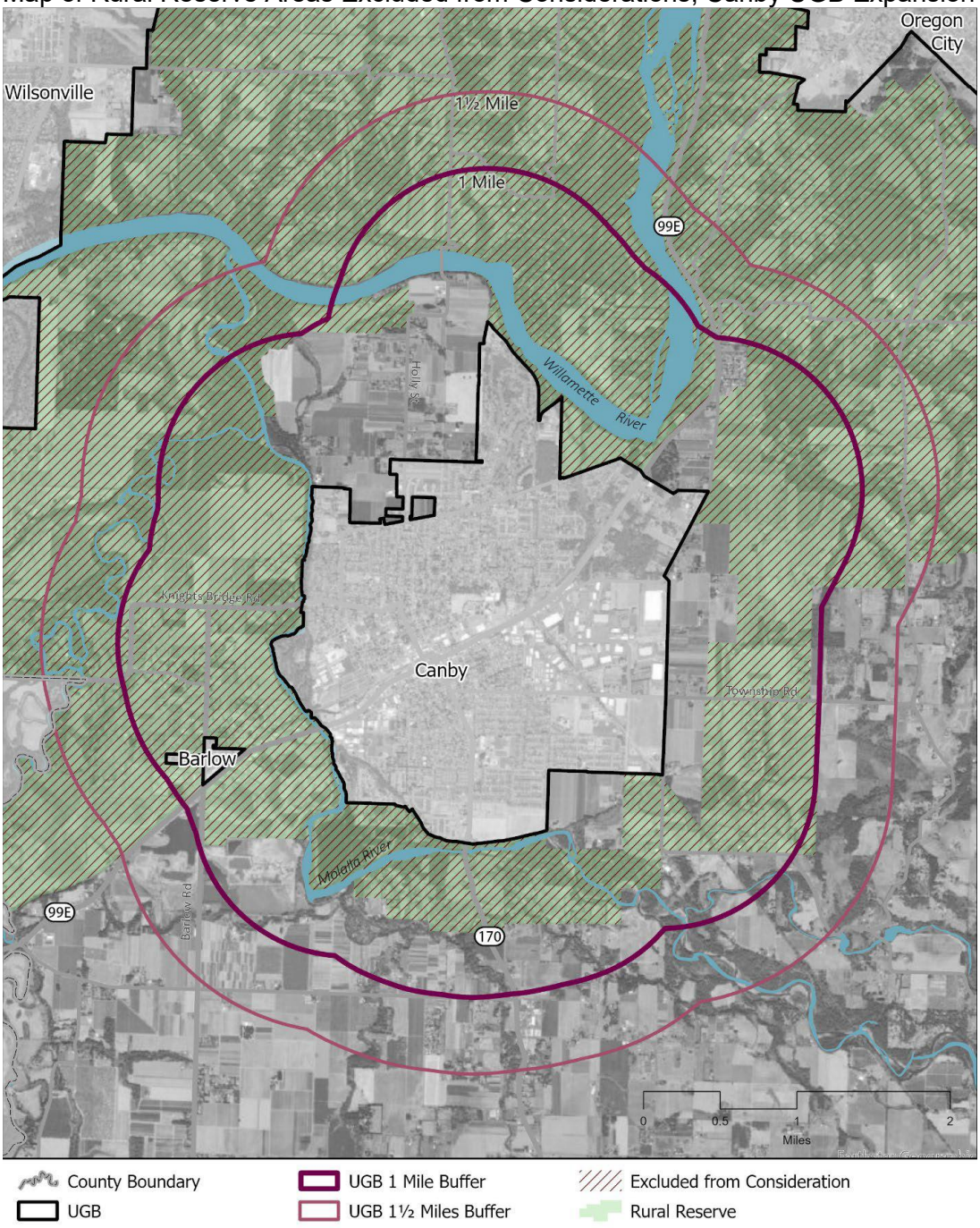
4.A.2.1 Land needed to accommodate 20 years of future urban population growth.
4.A.2.2 Land needed for increased housing, employment opportunities and livability from both a regional and subregional view.
4.A.2.3 Land to which public facilities and services can be provided in an orderly and economic way.
4.A.2.4 Land which insures efficient utilization of land within existing urban areas.
4.A.2.5 Land which is best suited for urban uses based on consideration of the environmental, energy, economic and social consequences.
4.A.2.6 Agricultural land only after considering retention of agricultural land as defined, with Class I having the highest priority for retention and Class VI the lowest priority.
4.A.2.7 Land needed after considering compatibility of proposed urban uses with nearby agriculture activities.
4.A.2.8 Land where the strategic location of employment and living opportunities can minimize commuting distance, traffic congestion, pollution and energy needs.

Coordination between city and county staff occurred throughout the development of the city's UGB proposal, primarily through the Technical Advisory Committee (TAC) and Policy Advisory Committee (PAC). County staff from the Department of Transportation

and Development (DTD) were sitting members on both the TAC and PAC and were invited to participate in public outreach events.

As illustrated in figure below, there is a large amount of areas designated as rural reserve around Canby's UGB, which limits the potential expansion generally to the east and north. None of the UGB expansion areas proposed in ZDO-296 are within the rural reserves; all are to the east and north.

Map of Rural Reserve Areas Excluded from Considerations, Canby UGB Expansion



Source: City of Canby: Urban Growth Boundary Expansion, page 22

The sub-policies 4.A.2.1 through 4.A.2.8 relate to areas that may be designated urban, but are intended to be directive to county, for the areas the county would plan and designate for urban development. However, if we assume these policies are relevant because the amendment of the UGB line *enables* the urbanization of these rural lands, staff can relatively easily find that the proposal is consistent. The city has demonstrated that all of the factors identified in subpolicies 4.A.2.1 through 4.A.2.8 were adequately addressed through the detailed Goal 14 analysis of the study area and consideration of which lands to include in the city's UGB and which lands to not include in the UGB.

4.A.4 Establish Urban Growth Management Areas and Urban Growth Management Agreements to clarify planning responsibilities between the County and cities for areas of mutual interest.

County and city have an existing UGMA. While dated, it still remains in effect and describes the planning responsibilities in the areas of mutual interest.

4.F.1 Land established as a Rural Reserve area shall not be included in an urban growth boundary.

The proposed UGB expansion area includes no areas that are designated as a rural reserve.

This proposal is consistent with Chapter 4.

Chapter 11 – *The Planning Process*:
Chapter 11 of the Comprehensive Plan includes policies requiring inter-governmental and inter-agency coordination, public involvement, and noticing. As explained previously in this report, all required entities have been notified in accordance with law and have been invited to participate in duly-advertised public hearings.

Chapter 11 of the Comprehensive Plan also contains the specific requirement that the Comprehensive Plan and ZDO be consistent with Statewide Planning Goals and with Metro's Urban Growth Management Functional Plan; Chapter 11 is what requires the ZDO itself to be consistent with the Comprehensive Plan. This report's *Analysis & Findings* outline how ZDO-296 is consistent with all of these requirements.

This proposal is consistent with Chapter 11.

3. Zoning and Development Ordinance (ZDO):

The proposed Plan amendments are legislative. Section 1307 of the ZDO establishes procedural requirements for legislative amendments, which have been or are being followed in the proposal and review of ZDO-296. Notice of this proposal was provided at least 35 days before the first scheduled public hearing to DLCD, all cities in the County, and active CPOs and Hamlets, as well as other interested agencies, to allow them an opportunity to review and comment on the proposed amendments. Advertised public hearings are being held before the Planning Commission and the Board of County Commissioners to consider the proposed amendments. The ZDO contains no further specific review criteria that must be applied when considering an amendment to the text of the Comprehensive Plan or ZDO.

RECOMMENDATION

Staff recommends approval of Z0411-26 & ZDO-296, as proposed. Staff finds the proposed urban growth boundary expansion for the city of Canby and proposed Comprehensive Plan amendments are consistent with all applicable criteria.

ATTACHMENTS

1) Proposed amendments to Appendix B of County Comprehensive Plan
2) Exhibits, including the city of Canby's application materials and written testimony received by the county

PLANNING COMMISSION
MINUTES

November 9, 2026
6:30 pm
On the Zoom platform
Recording available at https://www.clackamas.us/planning/planning-commission

Commissioners present: Gerald Murphy, Michael Wilson, Brian Lee, Ryan Founds, Jennifer Satter, Scott Cantonwine, Thomas Peterson, Tyler King, Tammy Stevens.

Staff present: Martha Fritzie, Principal Planner; Jennifer Hughes, Planning Director; Darcy Renhard, Administrative Specialist II.

Commission Chair Stevens called the meeting to order at 6:31 p.m.

Roll Call: Ms. Renhard called the roll.

Public Comment: None

Chair Stevens opened the public hearing for file number ZDO-296 and Z0411-26, a legislative proposal to expand the City of Canby's Urban Growth Boundary.

Ms. Fritzie introduced the staff report for the proposal. The proposed urban growth boundary (UGB) amendment is generally referred to as ZDO-296. It requires a legislative comprehensive plan amendment that would affect a number of maps in the Comprehensive Plan to accurately reflect the new boundary. It would also adopt the primary background document justifying the City of Canby's UGB expansion into Appendix B of the Comprehensive Plan.

Ms. Fritzie explained that an urban growth boundary is essentially an imaginary line on a map that identifies the area where urban development and urban services can happen versus where they generally cannot. It is a line distinguishing between urban and rural areas. Canby is one of several cities within Clackamas County with a UGB. It is not part of the Portland metropolitan area or the Metro UGB, it has control over it own UGB. A UGB under State law is required to have a 20-year supply of buildable land. When a city has grown but not expanded their UGB-in Canby's case roughly 40 years-it is understandable that there would be a need to take a look at the lands inside the current UGB and see if there is a need to expand the boundary in order to accommodate this 20-year supply requirement. When an urban growth boundary line moves, it does not immediately change the zoning of the lands inside the new boundary. Land inside the UGB still needs to take the step to annex to the city to be able to access urban services. The city would apply an urban zoning designation when that happens.

The City of Canby initiated this long and complicated process before 2023. They performed an Economic Opportunities Analysis for employment land (EOA) and a Housing Needs Analysis for housing land (HNA). They submitted them to the State as required, and both were adopted and acknowledged. They have also looked at their Parks & Recreation Master Plan. They used these analyses as a basis for their proposed UGB expansion. The first step is to look at the land that is currently within the UGB and determine whether some

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properties can be rezoned to accommodate the need. The City of Canby did this, but there is still a need for additional land to be brought into the UGB.

The City of Canby performed public outreach throughout the process including multiple advisory committees. County staff and representatives from other agencies have been involved in the process and provided feedback. The City held a series of public hearings in front of their Planning Commission and City Council, and the proposal was officially adopted on October 7th by unanimous vote.

The reason that this proposal is before the County is because it does affect County lands and there is a requirement that a UGB expansion be agreed on and mutually adopted by both the city and county prior to submittal to the state.

The City of Canby is proposing to bring a total of just over 512 acres into the UGB, of which 183 are "exception lands" and 329 acres are agricultural land under current County zoning. The need that was identified is for 73 acres for residential development, a little over 25 acres for parks, and over 400 acres for employment land. The City is required to address the housing needs shortage, but they have also chosen to take care of what they consider an obligation for parks based on their City's Master Plan and expected population growth as well as to address most of the identified employment needs.

County staff finds that the City's proposal meets all of the applicable Statewide Planning Goals, statutes, and administrative rules as well as the County Comprehensive Plan.

Commissioner Satter asked why Subarea 7 was included in the area to be brought into the UGB but Subarea 10 was not. She stated that Subarea 10 has approximately 90 acres suitable for industrial development with existing utility connections and favorable transportation access. Subarea 7 is going to require a substantial amount of infrastructure improvement. Ms. Fritzie explained that cost is not the only factor that is considered. They must also consider compatibility and impacts. The City determined that Subarea 10 was more appropriate for residential development, but Subarea 1A takes care of all of their residential development needs.

Don Hardy, Planning Director; Ryan Potter, Planning Manager, Steve Faust, 3J Engineering (representing City of Canby): Mr. Hardy said that there was a lot of conversation during this process about Subarea 10 being included. The conclusion was that Subarea 10 is more suitable for residential development because it is adjacent to other residential areas. The City is required to accommodate the demand for future housing land, but it is not required to fulfill every single acre needed for employment needs. Since Subarea 1A is an exception land it has to be considered first.

They provided a description of the robust community engagement efforts over the past 3 years and how the majority of residents strongly support the proposed expansion.

Mr. Faust explained that their HNA had determined a need of 73.1 acres for housing and infrastructure, which the city is required by State law to accommodate. The need for employment land, primarily industrial with 0.70 acres of commercial, came to 439.2 acres. They are not required to accommodate the entire employment land need. The total 20-year land need was determination was up to 538.0 acres, but the City is only asking to move up to 512.3 acres into the UGB. The residential acreage is 73.1 of those 512 acres, with an additional 25.7 acres designated for parks.

Commissioner Satter asked about the impact that the potential growth might have on the water usage from the Molalla River. Mr. Hardy explained that development could not proceed without appropriate infrastructure in place. The City of Canby is currently working with Canby Public Utility on a plant to withdraw water from the Willamette River.

Susan Myers- Ms. Meyers represents herself as well as Montecucco Rentals. She has attended all the public and stakeholder meetings. Montecucco Rentals rents land to Montecucco Farms, a family-owned business that owns 360 acres located around Canby, primarily north of Canby in Subareas 1A, 5, 6, 7, and 8. She is very much in support of the proposed UGB expansion. She knows they will have to move their farm eventually because they are landlocked between the Molalla River and the Willamette River. They are farming more land to the south, which is making it harder and harder to move their machinery as well as the produce. Their plan is to continue farm operations until they are ready to develop, but that is in the distant future. Currently they are only looking at developing a small portion of their land. During the public outreach process there were people who stepped forward with concerns, but their concerns were alleviated once they realized that nobody was being forced to annex. The process is long and there is infrastructure that needs to be in place before development can proceed. The City is far behind on urban growth expansion.

Ethan Manuel- Mr. Manuel has also been a member of the project advisory committee for this process. This will be an important step forward for the community. He represents a family farm with a large parcel in Subarea 8. He envisions having the appropriate density applied to the property once it annexes so it can support economic development opportunities for the community. He is fully in support of this process and thanked the Planning Commission for the chance to express his feelings.

Commissioner Cantonwine applauded the City for the level of public outreach and involvement throughout the whole process.

Commissioner Cantonwine moved to recommend approval of ZDO-296/Z0411-26 by the Board of County Commissioners as recommended in the staff report. Commissioner Lee seconded the motion. **Ayes=9, Nays=0. Motion is passed.**

The hearing for ZDO-296/Z0411-26 was closed at 7:47 p.m.

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Appendix B

SUMMARY OF SUPPORTING DOCUMENTS

CITIZEN INVOLVEMENT

Citizen and Agency Involvement Program.

Clackamas County Citizen Involvement Program. Comprehensive Plan Chapter 2.

Committee for Citizen Involvement Bylaws.

Committee for Citizen Involvement Roster.

Community Planning Organization Leaders. Lists and maps of CPO areas.

NATURAL RESOURCES AND ENERGY

Clackamas County Energy Project Publications, 1983:

- An Energy Anthology
- Clackamas County Energy Use and Supply Background Data
- Clackamas County Energy Management Plan
- Technical Memorandum, Energy Emergency Planning
- Technical Memorandum, County Buildings
- Technical Memorandum, County Motor Fleet
- Technical Memorandum, County Organization

Clackamas County Resources Atlas, Clackamas County Dept. of Environmental Services, Planning Division. Includes maps of the following:

- General Resources
- Agricultural Land Types and Major Production Areas
- Forest Zones and Vegetative Types
- Cubic Foot Forest Site Classes
- Forest Ownerships
- Urban Forest Cover
- Detailed SCS Soil Mapping Index
- Unique National and Scenic Features
- Open Urban Land Inventory

- Park and Recreation Facilities; Historic and Cultural Sites
- Fisheries and Wildlife Habitats
- Aggregate Sites
- Groundwater Studies Index
- Geologic Hazards, Northwest Clackamas County
- River Corridors, Existing Conditions and Management Strategies
- Precipitation and Physiography

Draft Third Biennial Energy Plan, Action Plan and Recommendations, Oregon Department of Energy, October 1988.

Environmental Geology of the Kellogg Creek-Mt. Scott Creek and Lower Clackamas River Drainage Areas, Northwestern Clackamas County, Oregon, M.S. Thesis, Matthew John Brunego, March, 1978.

Federal Land Resource/Management Plans - Mt. Hood National Forest, Draft EIS, U.S. Forest Service, 1988; and Eastside Salem District Planning Area Land Use Plan (Clackamas Unit), Bureau of Land Management, 1982.

Fish and Wildlife Habitat Protection Plan for Clackamas County, Oregon Department of Fish and Wildlife, 1979.

Geologic Hazards of the Bull Run Watershed, Multnomah and Clackamas Counties, Oregon, Oregon Bulletin 82. Oregon Department of Geology and Mineral Industries, 1974.

Geology and Geologic Hazards of Northwestern Clackamas County, Oregon Bulletin 99, Oregon Department of Geology and Mineral Industries, 1979.

Geology and Ground Water of the Molalla-Salem Slope Area, Northern Willamette Valley, Oregon, U.S. Geological Survey, 1967.

Ground Water Resources in the French Prairie Area, Northern Willamette Valley, Oregon, U.S. Geological Survey, 1967.

Ground Water Resources in the East Portland Area, Oregon, U.S. Geological Survey, 1965.

Lakes of the Mt. Hood National Forest, Oregon Dept. of Fish and Wildlife and U.S. Forest Service, N.D.

National Wetlands Inventory, U.S. Dept. of the Interior, Fish and Wildlife Service, Individual Quad Maps Covering Clackamas County, 1981 to date.

1980 Major Water Tables Aquifers Map, supplied by Oregon Dept. of Environmental Quality, N.D.

1984 Census of Agriculture, U.S. Dept. of Commerce, Bureau of the Census, Vol. 1, part 36.

Oregon Air Quality, 1988 Annual Report, Dept. of Environmental Quality, Air Quality Control Division, Portland, Oregon.

Oregon Natural Areas Clackamas County, Oregon, Natural Heritage Program, the Nature Conservancy, 1977.

Oregon Nongame Wildlife Management Plan (Revised Draft), Oregon Dept. of Fish and Wildlife, June, 1984.

Oregon Outdoor Recreation "SCORP '83", State Parks and Recreation, Oregon Dept. of Transportation, 1983.

Oregon's Statewide Assessment of Nonpoint Source Problems, Oregon Dept. of Environmental Quality, 1978.

Planning Background Report, Energy; Clackamas County Dept. of Environmental Services, Planning Division.

Planning Background Report, Natural Hazards; Clackamas County Dept. of Environmental Services, Planning Division.

Planning Background Report, Natural Resources; Clackamas County Dept. of Environmental Services, Planning Division.

Planning Background Report, Rivers; Clackamas County Dept. of Environmental Services, Planning Division.

Preliminary Willamette River Greenway, Royston, Hanamoto, Beck and Abey, 1974.

Regional Urban Wildlife Habitat Maps, U.S. Army Engineer District Portland Corps of Engineers, 1978.

Review of Land, Water, Air Quality and Noise Control, 1980-88, Clackamas County Planning and Economic Development Division, 1988.

Rock Material Resources of Clackamas, Columbia, Multnomah and Washington Counties, Oregon, Oregon Dept. of Geology and Mineral Industries, 1978.

State Comprehensive Outdoor Recreation Plan, Technical Documents I, II, and III; ODOT, Parks and Recreation Branch.

Timber for Oregon's Tomorrow, Oregon State University School of Forestry, Beuter, John H.; Johnson, K. Norman; Scheurman, H. Lynn; Research Bulletin 19, January 1976.

U.S. Dept. of Agriculture Forest Service, "Timber Resource Statistics for Northwest Oregon," Basset, Patricia M.; preliminary copies of unpublished report, 1979.

Water Resources Data for Oregon 1976, 1977, U.S. Geological Survey.

Well Hydrographs Clackamas County, Oregon, Oregon Water Resources Dept., unpublished.

Wilderness Management Plan for the Table Rock Wilderness (Draft), U.S. Dept. of the Interior, Bureau of Land Management, 1986.

Willamette Greenway Plan, Bureau of Planning, Portland, Oregon, November, 1987.

The Willamette River Greenway, Oregon State Parks and Recreation Branch, Dept. of Transportation.

LAND USE

Comprehensive Plan, Clackamas County, Oregon, Planning Dept., Clackamas County, August, 1974.

Comprehensive Plan, Clackamas County, Oregon, Planning Dept., Clackamas County, June, 1980.

Comprehensive Plan Update, The Sunnyside United Neighbors, June 30, 1988, Revised August 22, 1988.

Comprehensive Plan, Clackamas County, Oregon, Planning Dept., Clackamas County, June 1992.

Let's Build A Revised Comprehensive Plan for Clackamas County, Dept. of Environmental Services, Clackamas County, January, 1979.

Sunrise Center Task Force, Clackamas County, December, 1987.

City of Sandy Urban Growth Boundary Expansion Analysis – Final Report, City of Sandy Planning Department, February 2017.

City of Sandy Urbanization Study – Final Report, City of Sandy Planning Department, January 2015.

City of Canby Urban Growth Boundary Expansion Report, 3J Consulting, September 2026.

TRANSPORTATION

5 Year Transportation Capital Improvement Plan, Fiscal Years 1996-2000, Clackamas County, July, 1996.

Capital Improvement Plan, 5-Year Capital Improvement Program, FY 1998/99 to 2002/03, 20-Year Long Range Transportation Plan, 1998 to 2008, December 1998.

Getting There by Bike, Metropolitan Services District, Metro, 1988.

Handbook for Environmental Quality Elements of Land Use Plans, Air Quality, Oregon Dept. of Environmental Quality, 1978.

I-5/Canby/Highway 213 Access Improvement Study, Clackamas County Dept. of Transportation and Development, 1987.

Oregon Action Plan for Transportation, Oregon Dept. of Transportation, 1989.

Planning Background Report: Transportation, Clackamas County Dept. of Environmental Services, Planning Division, 1979.

Planning With Transit, Tri-Met, 1979.

Public-Private Task Force on Transit Finance, Policy Report, Barney and Worth, Inc., 1988.

Regional Bicycle Plan, Metropolitan Service District, August 1983.

Regional Transportation Plan, Metropolitan Service District, 1989.

Six-Year Highway Improvement Program 1989-1994, Oregon Dept. of Transportation, 1988.

State of Oregon Bicycle Master Plan, Oregon Dept. of Transportation, Highway Division, March 15, 1988.

Oregon Bicycle and Pedestrian Plan, Oregon Department of Transportation, Highway Division, June 14, 1995.

Sunnyside I-205 Split Diamond Interchange, Clackamas County Dept. of Transportation and Development, 1988.

Sunnyside Road, (I-205 to SE 172nd Avenue) Environmental Assessment. Clackamas County, August 21, 1998.

Sunrise Corridor Reconnaissance Study, Oregon Dept. of Transportation, Highway Division, Region 1, 1987.

A Systems Analysis of Major Regional Transportation Corridors, MSD, 1979.

Transportation Involvement Program, Metropolitan Service District, 1987.

Transportation Plan Background Document, Clackamas County Dept. of Transportation and Development, September 2013.

Clackamas County Transportation Safety Action Plan, Kittelson & Associates, July 2013.

Clackamas County ITS (Intelligent Transportation System) Action Plan, DKS Associates, May 2011.

Tri-Met Five-Year Transit Development Plan, Tri-Met, 1987.

SE 172nd Avenue/ SE190th Drive Corridor Management Plan, Appendix A - Environmental Baseline Report, MB&G, Inc., September 20, 2011

SE 172nd Avenue/ SE190th Drive Corridor Management Plan, Appendix B – Analysis of Preferred Alternative

SE 172nd Avenue/ SE190th Drive Corridor Management Plan, Appendix C –
15% Design Plans, Alignment Alternative AT2, Clackamas County,
October 24, 2011

SE 172nd Avenue/ SE190th Drive Corridor Management Plan, Appendix E – Corridor Centerline Survey, November 10, 2011

Clackamas County Active Transportation Plan, Appendices A through F

Damascus Mobility Plan, Kittleson & Associates, Inc., July 27, 2022

Walk Bike Clackamas Plan, Appendices A through T

HOUSING

A Report to the Board of County Commissioners, Housing Affordability and Homelessness Task Force, December, 2019.

Background Report for the Clackamas County Comprehensive Plan Update 1989, Goal 10 - Housing, Clackamas County Dept. of Transportation and Development, Economic Development Section, 1989.

Clackamas County Regional Housing Need Analysis, EcoNorthwest, September, 2019.

Exploring the Factors that Drive Displacement Risk in Unincoprorated Clackamas County: With a Special Look at Manufactured Housing Communities, EcoNorthwest, September, 2019.

Long-Range Planning Issue Paper #2020-1: Housing Strategies Related to Comprehensive Plan and Zoning and Development Ordinance Updates, Planning and Zoning Division, Clackamas County, February, 2020.

Plan for Community Development, Clackamas County Dept. of Environmental Services, Planning Division, 1979.

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Clackamas County School Directory 1988-1989, Education Service District, 1988.

CRAG 208 Areawide Wastewater Treatment Management Study, (Volumes 1 and 2, including technical supplements), CRAG, 1977.

DEQ Coordination Program Approved by LCDC, Dept. of Environmental Quality, 1978.

Draft Plan for Community Development - Clackamas County, Clackamas County, January, 1979.

Draft Regional Water Supply Plan, U.S. Army Corps of Engineers, 1979.

Drainage Management Flood Damage Reduction Measures, Kramer, Chin and Mayo, 1978.

Drainage Management Planning Manual, Review Draft, U.S. Army Corps of Engineers, March, 1979.

Drainage Study for the City of Milwaukie, Oregon, Stevens, Thompson and Runyan, 1970.

Drainage Study of the Oak Lodge Area, Clackamas County, Stevens, Thompson and Runyan, 1970.

Guide to Water and Sewer Systems, CRAG, 1976.

Interim Guidelines for Storm Water Run-off Management in the Johnson Creek Basin, MSD, 1979.

Inventory of Existing Water Supply Systems for Major Outlying Communities, U.S. Army Corps of Engineers, 1978.

Kellogg Creek Storm Drainage, Clackamas County, CH2M, 1970.

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North Clackamas Urban Area Public Facilities Plan, Storm Drainage Element, Clackamas County Dept. of Transportation and Development, Planning and Economic Development Division, February, 1989.

North Clackamas Urban Area Public Facilities Plan, Transportation Element, Clackamas County Dept. of Transportation and Development, Planning and Economic Development Division, November, 1988.

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Sewerage Facilities Plan for Mt. Hood Recreational Corridor, Stevens, Thompson and Runyan, 1977.

Solid Waste and Waste Management Ordinance, Clackamas County, 1970, Amended 1973, 1975, 1985, and 1989.

Solid Waste Landfill Study, Clackamas County, CH2M-Hill, 1971.

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Storm Sewer and Drainage Study of the Lake Oswego Area, CH2M, 1968.

Subdivision Manual, Clackamas County, 1975.

Water and Sewerage for Non-Urban Clackamas County, Clackamas County, 1970 (Vol. 1 and 2).

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Planning Commission/BCC Exhibit List
In The Matter Of File No. Z0411-26 & ZDO-296

Ex. No.	*Date Received*	*Author or source*	*Subject & Date of document*
1*	09/27/26	City of Canby	Submitted application, including attachments: • Narrative • September 2026 Urban Growth Boundary Report • UGB Expansion Tax Lot List • August 19, 2026, DLCD letter • September 2, 2026 Letter of Support from Susan Myers • September 16, 2026 Letter of Support from Ethan Manuel • Canby Adopted Housing Needs Analysis, Ordinance Number 1627, August 2024 • Canby Adopted Economic Opportunities Analysis, Ordinance Number 1611, September 2023 • Economic Opportunity Analysis, September 6, 2023 City Council PowerPoint • Clackamas County Pre-Application Conference Summary
2*	10/23/26	Kelly Reid, Dept of Land Conservation and Development (DLCD)	Comments noting that there are known wetlands in the proposed UGB expansion area and city will be required to conduct an local inventory. Does not affect county decision.
3			
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* Exhibits received prior to or during 11/09/26 Planning Commission (PC) hearing

** Exhibits received after 11/09/26 PC hearing and prior to or during 12/01/26 BCC hearing

Canby Proposed UGB Expansion Amendment (UGB 26-01) for Clackamas County Application Narrative

Summary

The City of Canby City Council approved the proposed Canby Urban Growth Boundary on September 16, 2026 and this application to Clackamas County is for county planning commission and board of county commissioner review and approval of the proposed Canby urban growth boundary.

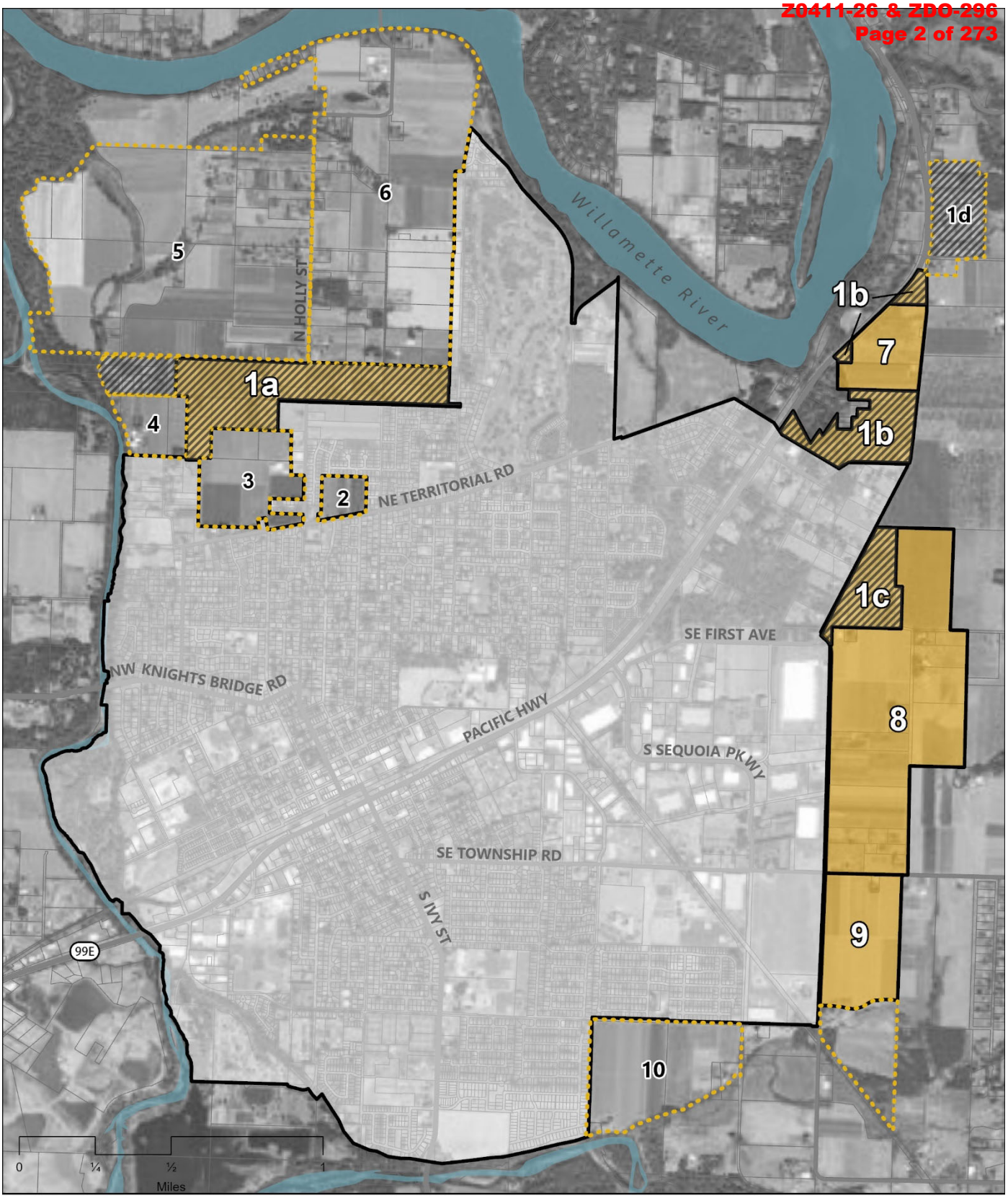
Based on the included record and August 24, 2026 Canby Planning Commission unanimous 7 to 0 recommendation of approval, the city council unanimously approved the proposed urban growth boundary 6 to 0. There was only one person who testified against the urban growth boundary at the planning commission hearing and no testimony against the urban growth boundary at the city council hearing. All written testimony was for approval of the urban growth boundary expansion and provided by two individuals. The summary of verbal and written testimony is included below.

During the August 24, 2026 hearing, the planning commission recommended unanimous approval of the urban growth boundary with 73.1 acres of residential area in Subarea 1a, the full amount of park land permitting in Subarea 1a, 25.7 acres and the full amount of neighborhood commercial acreage in Subarea 1a, 3.7 acres. The planning commission also recommended that the proposed Subareas 1b, 1c, 7, 8 and 9 be included in the urban growth boundary. Subarea 1a is first priority Exception Lands/Non-EFU land.

During the September 16, 2026 hearing, the Canby City Council approved a 512.3 acres urban growth boundary expansion with the following urban growth boundary expansion areas: A total 98.81 acres in Subarea 1a (73.12 acres for residential and 25.69 acres of park land). Also, the urban growth boundary expansion included Subareas 1b, 1c, 7, 8 and the northern portion of subarea 9 (60.8 acres) for employment lands, totaling 413.5 acres. Maps of the city council approved urban growth boundary are shown below. The city council did not include any neighborhood commercial land as part of subarea 1a. Further details are provided in the September 26, 2026 Urban Boundary Report which documents the total identified need of 538 gross acres. The table below provides the proposed UGB Expansion acres by Subarea.

Attachments

1. County UGB Application Form
2. September 2026 Urban Growth Boundary Report
3. UGB Expansion Tax Lot List
4. GIS Shapefile of UGB Boundary
5. August 19, 2026, DLCD letter
6. September 2, 2026 Letter of Support from Susan Myers
7. September 16, 2026 Letter of Support from Ethan Manuel
8. Canby Adopted Housing Needs Analysis, Ordinance Number 1627, August 2024
9. Canby Adopted Economic Opportunities Analysis, Ordinance Number 1611, September 2023
10. Economic Opportunity Analysis, September 6, 2023 City Council PowerPoint
11. Clackamas County Pre-Application Conference Summary

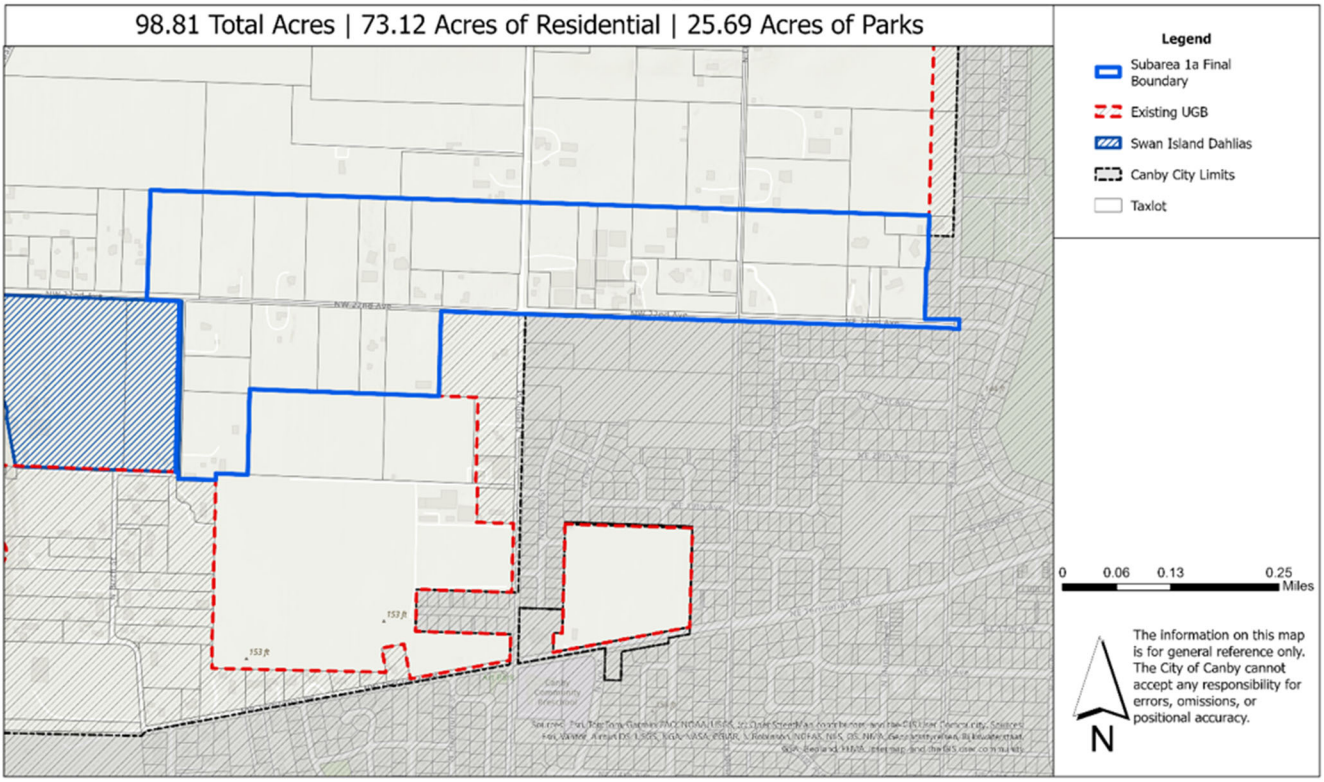


UGB
UGB Study Area
2026 UGB Expansion Recommendation
Exception Lands

Summary of Study Area and UGB Amendment Acreage

Subarea	Gross Acres	Gross UGB Acres	Unconstrained Residential Acres	Unconstrained Park Acres	Unconstrained Employment Acres	Total Unconstrained Acres
1a	115.9	98.8	73.1	25.7		98.8
1b	50.0	50.0			42.3	42.3
1c	34.3	34.3			34.3	34.3
1d	39.0					
2	13.0					
3	60.8					
4	27.8					
5	392.5					
6	345.8					
7	40.5	40.5			38.7	38.7
8	227.9	227.9			213.5	213.5
9	112.0	60.8			60.8	60.8
10	95.9					
TOTAL	**1,555.4**	**512.3**	**73.1**	**25.7**	**389.6**	**488.4**

City of Canby | Area 1A



Proponents: Jerome Simnitt and Susan Myers, and Neutral Mindy Montecucco

Jerome Simnitt, City resident and landowner, expressed support for the UGB expansion east of Holly Street. He stated that he felt the City had done a good job supporting the area, particularly with improvements and development east of Holly Street, and expressed appreciation for the City's efforts.

Susan Myers, City resident and representative for Montecucco Rentals, expressed support for the UGB expansion and supported bringing in as much land as possible. She stated that the expansion could open additional property for future development, provide opportunities to incorporate additional park land, and create more transportation routes. She also noted the potential to expand the Emerald Necklace in the future. Myers highlighted infrastructure challenges and the need for additional transportation planning within Areas 5 and 6.

Neutral Comment:

Mindy Montecucco, City resident and Chair of the Bike and Pedestrian Committee, expressed support for considerations related to the UGB expansion and discussed the importance of preserving and expanding opportunities for parks, trails, and transportation connectivity. She noted that Area 6 may be more appropriate for housing due to the lower-value agricultural soils in the area and could provide opportunities to incorporate additional valuable park land. She also discussed Area 1A, stating that its inclusion could provide additional transportation connections and create future connectivity opportunities with Areas 2 and 3. Ms. Montecucco highlighted the western portion of Area 1A as an opportunity for parkland and connectivity to adjacent state park property. She also referenced existing natural areas, wetlands, the Metro property, and potential trail connections as factors to consider in long-term planning.

Opponents: Edward Montecucco

Edward Montecucco, City resident and landowner testified in opposition to the inclusion of properties west of Holly Street, citing the lack of existing services and traffic concerns associated with the unimproved Holly Street. He stated that the land was too valuable for farming and expressed concerns regarding the impacts of additional residential development.

Montecucco also discussed the area north along Maple Street, identified as Area 6, and noted that the larger lots and potential for residential development would make the area less suitable for farming. He encouraged the Commission to consider making the existing water features a more prominent focus of future development and suggested that the lakes in Area 6 could provide opportunities for parkland or residential development.

Montecucco proposed an alternative park concept utilizing the spring-fed lake area and encouraged consideration of the existing transportation conditions, agricultural value of the land, water features, and potential recreational uses when evaluating the proposal.

City Council Testimony Verbal Testimony

Proponent: Allen Patterson
Local commercial real estate broker, testified in favor of the urban growth boundary expansion and provided testimony about the success of the Pioneer Industrial Park with air photos of the early and later development of the park and how he was part of the development of the park.

Neutral Comment: Bruce Cramer
Resident requested confirmation of why the area south of the Barlow townsite was not included in the proposed urban growth boundary expansion.

The act of updating a city's UGB is a heavily regulated process dictated by state law and the proposed boundary amendment has been crafted using the appropriate policy framework. Evaluation details of the proposed UGB expansion area are provided in the September 2026 Urban Growth Boundary Expansion Report, included with the Clackamas County pre-application submittal. As noted in the report, Canby has also enrolled in the Sequential Method for UGB expansion process, Oregon Administrative Rule (OAR) 660-025-0185 and Oregon Revised Statutes (ORS) 197.626(3) govern the Sequential Method. This allowed the City to adopt the EOA and HNA in advance of a UGB expansion. Both of these documents have been approved and acknowledged by DLCD and are no longer up for challenge. The Canby UGB Expansion process is using the OAR Chapter 660, Division 24 rules effective January 1, 2025.

Attachments to this application include the September 2026 City of Canby Urban Growth Boundary Expansion Report tax lots and GIS shapefile of the proposed urban growth boundary.

Background

In Oregon, all cities have a UGB, which is a boundary intended to efficiently manage growth, limit sprawl, and protect farm and forest land. UGBs are intended to accommodate 20 years of growth. Properties within a UGB remain in the unincorporated County until landowners choose to annex into the adjacent city. While no one in the UGB is required to annex and develop, cities are required to plan transportation, infrastructure, land uses, and other considerations within the UGB area to accommodate future annexation and development.

According to Portland State University's Population Research Center (PRC), Canby is projected to grow by approximately 6,000 new residents by the year 2043, bringing the City's total population to nearly 25,000.

Canby's 2023 Economic Opportunities Analysis (EOA) was adopted on September 6, 2023 with the medium growth scenario which identifies a deficit of 439.2 acres to meet employment land needs through 2043, including land for infrastructure. The proposed employment areas include subarea areas 1b, 1c, 7, 8 and 9. The gross acres of this area is 413.5 acres and the unconstrained area is 389.6 acres. Unconstrainted acres remove those environmental constraints noted in the September 2026 City of Canby Urban Growth Boundary Expansion Report.

The City's Housing Needs Analysis (HNA) identifies a need for 73.1 acres, including land for infrastructure. The City identified a need of 25.7 acres for parks based in part on the City's 10 acres per 1,000 residents' aspirational level of service (LOS) in the adopted 2022 Comprehensive Parks and Recreation Master Plan and in the adopted 2026 Canby Comprehensive Plan. The overall proposed combined estimate for UGB Expansion is 488.4 uncontained acres to meet the City's 20-year land need. The total gross acres proposed for UGB expansion is 512.6 acres vs. the total identified need of 538 gross acres. The difference being 25.7 acres less industrial land and this is reflective of the limited suitable employment lands within the study area. Subarea 10 is recommended to not come into the UGB at this time as employment land as it has been determined through community involvement that this area is more suitable for residential land development and the need for residential land development is all fulfilled in subarea 1a.

In compliance with the policy framework in the State of Oregon, the City has initiated the process for a UGB expansion to accommodate the 20-year land need. Following Oregon Administrative Rules (OARs), the City created a Preliminary Study Area where all lands within a one-and-a-half-mile radius were considered for the expansion of the UGB. After excluding certain lands from the Preliminary Study Area that were not appropriate for an urban level of service or use, the Study Area contained 1,555 acres. Once the final Study Area was established, the City followed State rules to prioritize lands within the Study Area for inclusion in the proposed UGB expansion. First priority lands include non-resource, and exception lands that are not designated as rural reserves. There are approximately 239 gross acres of first priority lands, less than the land deficit of 538 acres.

The final proposal for UGB amendment is a result of the above analysis, along with a robust public outreach process that was conducted between 2023 and 2026.

Discussion

The following analysis evaluates the proposed UGB amendment's consistency with Oregon Statewide Planning Goals, the City's adopted Comprehensive Plan, and the Clackamas County Comprehensive Plan.

Goal 1, Citizen Involvement

The proposed UGB, which the City has chosen to develop in tandem with a Comprehensive Plan update and Transportation System Plan (TSP) update, has involved over three years of public engagement activities. These have included public meetings, workshops, open houses, tabling at public events, a robust notification scheme, and online engagement tools such as surveys. Citizen involvement activities have included materials and meetings catering to the Spanish-speaking community and have emphasized the scheduling of regular check-ins with opportunities for in-person. two-way communication. With the UGB expansion specifically, the planning process has included interactive mapping exercises where members of the community could express their preferences and ideas related to land use patterns, community character, circulation, recreation, and other topics. Public engagement has been partially overseen by a Project Advisory Committee (PAC), which comprised of elected and appointed officials, community leaders, business owners, and other stakeholders. The urban growth boundary process included, 11 community conversations, 5 community tabling events, 7 community summits (one in Spanish), 7 Project Advisory Committee Meetings, 3 Technical Advisory Committee meetings, 7 on-line questionnaires, 3 Listening Sessions, and dozens of planning commission and city council work sessions.

Citizen involvement has been an essential part of the planning process at every stage of the UGB amendment's development. Therefore, the City of Canby finds that the proposed UGB amendment is consistent with Goal 1 of the Statewide Planning Goals.

Goal 2, Land Use Planning

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

The proposed UGB amendment was established utilizing the guidance provided by Statewide Planning Goal 14, Urbanization, which incorporates the requirements of ORS 197A.300 to 197A.325, and establishes requirements for a factual basis. The amendment is a product of extensive analysis of natural resources, development patterns, population and economic data (including recently adopted HNA and EOA), and public engagement.

Alternatives to the proposed expansion were reviewed and discussed throughout the development of the proposed UGB boundary. Furthermore, the proposed UGB amendment was developed in tandem with a new City of Canby Comprehensive Plan, which allowed both policy efforts to be underpinned by the same goals and policies.

For the above reasons, the City of Canby finds that the proposed UGB amendment is consistent with Goal 2 of the Statewide Planning Goals.

Goal 3, Agricultural Lands

Goal 3 requires local agencies to identify farmland and protect it for continued farm use to the extent possible. The study area for the UGB amendment has extensive areas that are zoned Exclusive Farm Use (EFU) by Clackamas County due to the prime soils in and around Canby. Nearly all land surrounding the existing Canby UGB is considered high-value farmland as defined by ORS 215.710. The proposed UGB amendment prioritizes non-EFU lands that are highly parcelized and already zoned for non-farm uses (i.e., the "exception lands"). However, to meet the 20-year land needs of the City, the proposed UGB amendment does include EFU-zoned properties. Final approval of the UGB amendment will require approval by Clackamas County, which is tasked with managing EFU land per Goal 3.

The City of Canby finds that the proposed UGB amendment is consistent with Goal 3 of the Statewide Planning Goals to the extent feasible.

Goal 4, Forest Lands

This goal is aimed at conserving existing forest lands. The proposed UGB amendment would not add rural reserve areas intended for exclusive forest use into the UGB. While some areas proposed to be added are zoned Residential Farm Forest (RRFF5) by Clackamas County, these areas are considered "exception lands" by the State of Oregon, which is the category of land that is required to be considered first when contemplating a UGB amendment. Furthermore, no areas within the proposed boundary are actively used for timber production.

For the above reasons, the City of Canby finds that the proposed UGB amendment is consistent with Goal 4 of the Statewide Planning Goals.

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

Goal 5 is a broad statewide planning goal that covers more than a dozen resources. The resources range from wildlife habitat, to historic places, and gravel mines. To protect and plan for them, local governments are asked to create a number of inventories.

In Canby, wetlands, riparian areas, and floodplains are concentrated along major waterways (Molalla and Willamette Rivers), particularly in Subareas 5 and 9. Canby's water supply relies on both the Molalla River and groundwater resources. Source water protection may influence the location and intensity of future development to protect water quality.

Goal 5 resource data identify four historic structures that have a Clackamas County Historic Landmark (HL) overlay within the Study Area, as shown in Figure 16 of the August 2026 Urban Growth Boundary Expansion Report. These include:

Kraft-Brandes-Culbertson Farmstead. Located at 2525 N. Baker Drive, this site includes the historic barn and water tower. (Subarea 5) and will not be within the proposed UGB. The Kraft Brandes Culbertson Farmstead, is on the National Register of Historic Places.

Olson, Olaf E & Anna House. Located at 3019 N. Holly Street, this site includes a historic garage, pumphouse, machine shed, and chicken coup. (Subarea 5), and will not be within the proposed UGB.

Bradtl, John, Farm. Located at 10012 S New Era Road, this site includes a historic pumphouse, smokehouse, granary, pig shed, and milk shed. (Subarea 1d), will not be within the proposed UGB.

Freeze, Harvey & Anna, Farm. Located at 23300 S. Blount Road, this site includes a historic woodshed and pumphouse. (Subarea 8). The farmhouse is recognized for its architectural and cultural integrity, and the property was officially designated as a Clackamas County Historic Landmark in 2007 and received a 2026 DeMuro Award for renovation. The upcoming concept planning process will address how this resource can be protected.

The upcoming concept planning process will address how these resource can be protected

For the above reasons, the City of Canby finds that the proposed UGB amendment is consistent with Goal 5 of the Statewide Planning Goals.

Goal 6, Air, Water, and Land Resources Quality

This goal instructs local governments to consider protection of air, water and land resources from pollution and pollutants when developing comprehensive plans. The pollutants addressed in Goal 6 include solid waste, water waste, noise, air pollution, industry-related contaminants, and thermal pollution.

Preliminary analysis for the proposed UGB amendment found that:

- Air quality meets federal standards and is not a significant constraint to future development.
- Compact growth and an efficient transportation system will help minimize future emissions.

- Water quality currently meets applicable standards, but continued protection will depend on managing stormwater runoff and other development-related impacts.
- Source water protection remains a key consideration, with groundwater recharge areas and wellhead protection influencing development in sensitive locations.
- The City's Stormwater Master Plan provides the framework for expanding stormwater infrastructure and managing runoff as the city grows.
- Agricultural soils, drainage patterns, and environmentally sensitive areas affect development feasibility and costs, while appropriate buffers will help maintain compatibility between industrial and residential uses.

For the above reasons, the City of Canby finds that the proposed UGB amendment is consistent with Goal 6 of the Statewide Planning Goals.

Goal 7, Areas Subject to Natural Hazards

This goal requires cities and counties to address natural hazards in their comprehensive plans with inventories, policies, and implementation measures. The preliminary analysis of the study area for the UGB amendment included an evaluation of natural hazards, including identified areas subject to floods or seismic hazards, and steep slopes susceptible to landslide activity. Several of the areas were purposely excluded from the study area, consistent with state law, due to the constraints they present for future development.

Seismic hazards, including the Cascadia Subduction Zone and regional fault systems, present long-term risks that should be considered in future development. Overall, the UGB study area is largely flat, with landslide hazards generally limited to river corridors. Subareas 5, 6, and 9 contain the greatest landslide susceptibility and may require site-specific geotechnical analysis and mitigation. The southern portion of subarea 9 has been removed from proposed UGB expansion due to floodplain limitations and subarea 5 and 6 are not proposed to be included in the UGB expansion.

For the above reasons, the City of Canby finds that the proposed UGB amendment is consistent with Goal 7 of the Statewide Planning Goals.

Goal 8, Recreational Needs

Goal 8 requires local governments to plan for the recreation needs of their residents and visitors. The goal places priority on non-motorized forms of recreation, and recreation areas that serve high-density populations with limited transportation options and limited financial resources. It also places priority on recreation areas that are free or available at a low cost to the public.

Land needed for parks, open spaces and trails is based on the City's level of service (LOS) in the adopted 2022 Comprehensive Parks and Recreation Master Plan and 2026 Comprehensive Plan, which is 10 acres of parks per 1,000 residents, plus open spaces and trails to connect all residents to a park. The 2043 population estimate of 5,931 people translates to a need for 59.3 acres of developed parks. As discussed in the preliminary analysis for the UGB amendment, some of these acres can be accommodated within Canby's existing UGB boundary. However, the proposed UGB boundary anticipates that new parkland will be paired with residential growth areas in Subarea 1A and that a regional-scaled recreational amenity may be accommodated in one of the other subareas. Concept planning for the approved UGB will further refine the best locations for parks within the UGB expansion area.

For the above reasons, the City of Canby finds that the proposed UGB amendment is consistent with Goal 8 of the Statewide Planning Goals.

Goal 9, Economic Development

This goal requires local governments to plan for economic growth and ensure that land is available to accommodate needed employment.

The adopted EOA prepared for the Comprehensive Plan update and UGB amendment projects that adopted medium

growth scenario will have a local demand for approximately 6,700 additional jobs between 2023 and 2043. To meet this projected demand, the EOA concludes that approximately 439.2 acres of additional industrial land including commercial land over the next 20 years. In the proposed UGB amendment, new nonresidential uses are proposed to be located east of the existing Pioneer Canby Industrial Park in Subareas 1B, 1C, 7, 8, and 9. 413.5 acres of employment lands are proposed for the UGB expansion and all suitable employment lands have been used, and the 25.7 acres not included based on the EOA identified need is reflective of the limited suitable employment lands within the study area. Included in the record is the September 6, 2023 Canby City Council Agenda and reports and PowerPoint that reflect the selection of the medium growth scenario. Up to 35 acres of employment land may also be used for sports complex purposes as identified in the adopted Economic Opportunities Analysis.

For the above reasons, the City of Canby finds that the proposed UGB amendment is consistent with Goal 9 of the Statewide Planning Goals.

Goal 10, Housing

Consistent with the text of Goal 10 and related Oregon Revised Statutes (ORS), the City of Canby prepared and adopted a Housing Needs Analysis (HNA) in 2024. This work product was intentionally crafted, in part, to identify the land need for future housing in the proposed UGB amendment. The HNA includes a buildable land inventory (BLI), evaluates population and housing trends, and identifies policies aimed at providing adequate land within the UGB to accommodate 20 years of population growth. The adopted HNA determined that 73.1 acres of additional residential lands are needed, and these are proposed to be accommodated in Subarea 1A (exception lands) of the UGB study area.

The sizing of the residential urban growth boundary also included housing efficiency measures in the adopted Housing Needs Analysis (2024) and Housing Production Strategy (2026), and included comprehensive plan changes for 56.8 acres of Area J. With these measures 73.1 acres of urban growth boundary housing need was determined.

Goal 11, Public Facilities and Services

The UGB Expansion includes land for provision of public roadways and infrastructure, and the July 2026 City of Canby Urban Growth Boundary Expansion Report assessed utility availability as part of the recommended urban growth boundary. The intent of this goal remains satisfied by the policies of the Comprehensive Plan and the required implementation in the Canby Zoning Ordinance.

For the above reasons, the City of Canby finds that the proposed UGB amendment is consistent with Goal 11 of the Statewide Planning Goals.

Goal 12, Transportation

The proposed UGB Expansion does not include changes to the Transportation System Plan or significantly affect a transportation facility. The proposal is to approve the UGB expansion area, but does not include land use designations or roadway alignments within the UGB area. A more detailed analysis of transportation system impacts will be forthcoming as part of the on-going UGB Concept Planning. Approval of the proposed UGB Expansion and Comprehensive Plan Text Amendment will comply with the Transportation Planning Rule.

For the above reasons, the City of Canby finds that the proposed UGB amendment is consistent with Goal 12 of the Statewide Planning Goals.

Goal 13, Energy Conservation

There are no identifiable energy consequences of this land use action. As noted under Goal 6, more compact growth and an efficient transportation system will help minimize future emissions and energy use. The city continues to be in compliance with Goal 13 through adopted Comprehensive Plan policies.

For the above reasons, the City of Canby finds that the proposed UGB amendment is consistent with Goal 13 of the Statewide Planning Goals.

Goal 14, Urbanization

The 1992 Clackamas County and City of Canby Urban Growth Management Agreement (UGMA) establishes a site-specific Urban Growth Management Boundary (UGMB) that includes unincorporated land within Canby's UGB; and procedures for city and county governance of the unincorporated areas. The purpose of the UGMA is to ensure that land in the UGB still under county jurisdiction can be urbanized in an orderly and efficient manner, and prevent parcelization and significant rural developments. The September 2026 City of Canby Urban Growth Boundary Expansion Report identifies the elements and procedures, and the proposed Canby Urban Growth Boundary Expansion is consistent with these procedures.

The on-going Urban Growth Boundary Concept Planning will ensure the efficient and effective provision of infrastructure to serve newly annexed areas.

For the above reasons, the City of Canby finds that the proposed UGB amendment is consistent with Goal 14 of the Statewide Planning Goals.

Goal 15, Willamette River Greenway

While portions of the study area for the UGB amendment are within the Willamette River Greenway (i.e., Subarea 6 near Molalla River State Park), the subareas proposed to be added to the UGB boundary are not within the greenway. The areas proposed for inclusion in the boundary that are closest to the Willamette River Greenway are Subareas 1b, and 7, which are both located east of Highway 99E. Therefore, the proposed UGB amendment would not adversely affect the resources protected by this goal.

For the above reasons, the City of Canby finds that the proposed UGB amendment is consistent with Goal 15 of the Statewide Planning Goals.

Goal 16, Estuarine Resources

Canby is approximately 50 miles east of the state's estuaries; therefore, this goal does not apply.

Goal 17, Coastal Shorelands

Canby is approximately 50 miles east of the coastal shore; therefore, this goal does not apply.

Goal 18, Beaches and Dunes

Canby does not feature any beaches or dunes; therefore, this goal does not apply.

Goal 19, Ocean Resources

Canby is approximately 50 miles east of the Pacific Ocean; therefore, this goal does not apply.

The June 2026 Canby Urban Growth Boundary Expansion is consistent the following Canby Comprehensive Plan Urbanization Policies:

City of Canby Comprehensive Plan Goal 14 Urbanization

POLICY NO. 1 Coordinate growth and development plans with Clackamas County as defined in the Clackamas County-City of Canby Urban Growth Management Agreement (UGMA), and other government and tribal agencies.

Finding: The 1992 Clackamas County and City of Canby Urban Growth Management Agreement (UGMA) establishes a site specific Urban Growth Management Boundary (UGMB) that includes unincorporated land within Canby's UGB; and procedures for city and county governance of the unincorporated areas. The purpose of the UGMA is to ensure that land in the UGB still under county jurisdiction can be urbanized in an orderly and efficient manner, and prevent parcelization and significant rural developments. The September 2026 City of Canby Urban Growth Boundary

Expansion Report identifies the elements and procedures, and the proposed Canby Urban Growth Boundary Expansion is consistent with these procedures.

POLICY NO. 2 Use accepted growth management techniques in a manner that will implement the Comprehensive Plan vision, goals, and policies.

Finding: Canby is completing a concurrent urban growth boundary expansion concept planning process which will ensure consistency with this policy.

POLICY NO. 3 Ensure the efficient and effective provision of infrastructure to serve newly annexed areas.

Finding: Canby is completing a concurrent urban growth boundary expansion concept planning process which will ensure consistency with this policy.

The proposed Canby Urban Growth Boundary Expansion is also consistent with the following Clackamas County Comprehensive Plan Goals and Policies:

4.A General Urbanization Goals and Policies.

I. Urbanization Goals from Chapter 4 Land Use, Clackamas County Comprehensive Plan

The Urbanization Goals are addressed below and the consistency analysis links to applicable county policies.

Adopted goal: Clearly distinguish Urban and Urban Reserve areas from non-urban areas.

Finding: The proposed amendment changes the City of Canby Urban Growth Boundary but does not annex property, apply City Comprehensive Plan designations or zoning, or authorize urban development. The City and Clackamas County have coordinated on the amendment because Canby is outside Metro's jurisdiction, consistent with General Urbanization Policy 4.A.2. The recommendation identifies Subarea 1a for residential and park needs and subareas 1b, 1c, 7, 8, and 9 for employment needs. Subareas 1a, 1b, and 1c are first-priority exception lands; Subareas 7, 8, and 9 are high-value farmland selected only after first-priority land proved insufficient. Rural Reserve lands were excluded, and the recommendation does not include subareas 4, 5, 6, 10, or 1d due to feasibility, land use type, access concerns and urban boundary area needs noted in the September 2026 City of Canby Urban Growth Boundary Expansion Report. The adopted boundary map will clearly distinguish the land inside the expanded UGB from land remaining outside it, while applicable County planning and zoning will continue to distinguish unannexed Future Urban land from land immediately available for urban use. The proposal is consistent with this adopted goal.

II. Orderly and Economic Provision of Public Services and Facilities

Adopted goal: Encourage development in areas where adequate public services and facilities can be provided in an orderly and economic way.

Finding: The project record evaluates the general feasibility of serving the selected areas with water, wastewater, stormwater, transportation, parks, emergency services, and other public facilities. The utility analysis finds that the areas can generally be served by extensions of existing or planned facilities. Subarea 1a can be served through facilities in the Holly Street and Locust Street areas, along with improvements to 22nd and Birch in the future; Area 8 has a nearby water/sewer and storm water connection; Area 9 is near a water/sewer main and the Mulino Road pump station; and Area 7 can be served through adjoining expansion land. Site-specific improvements will be determined through UGB expansion concept planning and subsequent annexation, capital planning, and development review. The preliminary transportation analysis considered connectivity, safety, multimodal access, reliability, efficiency, and fiscal responsibility. The eastern and southeastern employment areas have access to arterial and collector roads and 99E, while Subarea 1a can be served through planned improvements to 22nd Avenue and Holly Street identified by DKS Associates. Detailed street connections, bicycle and pedestrian facilities, emergency access, rights of-way, project phasing, agency coordination, and proportional funding will be established post-UGB amendment in their later respective processes with concurrent UGB concept planning occurring. Development will remain subject to annexation and requirements that adequate services and facilities be provided prior to or concurrent with

development. Area 1d, despite being recognized as priority land/exception land, was excluded due to a lack of serviceability and prior existing development. The proposal therefore satisfies Policies 4.A.2.9, 4.A.3, 4.C.3, and 4.C.4 at this boundary-planning stage and is consistent with this adopted goal.

III. Immediate and Future Urban Land Supply

Adopted goal: Ensure an adequate supply of land to meet immediate and future urban needs.

Finding: The adopted Housing Needs Analysis (HNA) and Economic Opportunities Analysis (EOA) identify a total 20-year land need. The analyses rely on the applicable coordinated population forecast and evaluate the housing and employment land required within Canby's planning boundary, consistent with Policies 4.A.2.1, 4.A.2.2, and 4.G.2. As identified in the September 2026 Urban Growth Boundary Expansion Report, the proposal provides sufficient land for the documented 20-year needs and is consistent with this adopted goal.

IV. Orderly and Efficient Transition to Urban Land Use

Adopted goal: Provide for an orderly and efficient transition to urban land use.

Finding: The City and our contractor, 3J Consulting, evaluated first-priority exception land before considering high-value farmland and excluded Rural Reserve lands and areas that were impracticable to serve. Areas 7, 8, and 9 were selected only after exception lands proved insufficient to meet the employment need. The recommendation avoids Swan Island Dahlia Farm/Subarea 4 and limits conversion of resource land to the areas selected through the Statewide Planning Goal 14 location analysis. The analysis also considered environmental, energy, economic, and social consequences; agricultural-land retention; compatibility with nearby agricultural activities; infrastructure feasibility; transportation access; and the relationship between future housing and employment areas, consistent with Policies 4.A.2.4 through 4.A.2.8. The UGB proposal tentatively identifies that we should place future housing near existing neighborhoods, planned parks, neighborhood services, and extensions of the City street network, while the employment areas are near existing industrial development. This pattern supports efficient use of public facility investments and can reduce unnecessary travel and dispersed infrastructure extensions, consistent with Policies 4.A.3.1 through 4.A.3.4. UGB expansion concept planning will occur, to identify use designations, streets, and infrastructure. Therefore, the proposal is consistent with this adopted goal.

V. Immediate Urban and Future Urban Lands

Adopted goal: Distinguish lands immediately available for urban uses from Future Urban areas within Urban Growth Boundaries.

Finding: This UGB amendment clearly separates lands available for urban development from lands that are not within a 20-year timeframe unless additional exceptions occur. By going through this multi-year process to identify priority exception lands and lands designated as Exclusive Farm Use that would meet the needs of the city without disrupting the agricultural economy, the City continues the land distinguishment process through this goal that has been ongoing. Until annexation and the required subsequent planning occur, the lands will remain subject to applicable County zoning for rural, agricultural, or forest uses with a five-acre minimum lot size or larger under Policy 4.C.1.3. Policy 4.C.3 requires annexation to Canby before conversion to Immediate Urban status unless the City and County agree otherwise, and Policy 4.C.4 retains applicable compatibility, function, and aesthetic standards. These safeguards clearly separate UGB inclusion and Future Urban status from land that is annexed, planned, zoned, serviced, and available for urban development. Therefore, the proposal is consistent with this adopted goal.

4.F Rural Reserve area policies

4.F.1 (Land established as a Rural Reserve area shall not be included in an urban growth boundary).

Finding: The proposed Canby urban growth boundary expansion does not include rural reserve designated land.

4.F.2 (Land established as Rural Reserve area shall not be included in an Urban Reserve area established pursuant to either OAR 660, Division 21, Division 27).

Finding: The proposed Canby urban growth boundary does not propose any urban reserve areas.

Goal 11 The Planning Process

Finding: The proposed Canby Urban Growth Boundary has been coordinated with county staff throughout the three-year update process and is consistent with statewide planning goals as described above. The established urban growth boundary needs are documented in detail in the September 2026 Urban Boundary Report that is part of this application.

The proposed Canby Urban Growth Boundary Expansion is also consistent with the following Oregon Revised Statues:

State Rules and Statues

ORS 660-012-0060, Plan and Land Use Regulation Amendments

(9) Notwithstanding section (1) of this rule, a local government may find that an amendment to a zoning map does not significantly affect an existing or planned transportation facility if all of the following requirements are met. (a) The proposed zoning is consistent with the existing comprehensive plan map designation and the amendment does not change the comprehensive plan map; (b) The local government has an acknowledged TSP and the proposed zoning is consistent with the TSP; and (c) The area subject to the zoning map amendment was not exempted from this rule at the time of an urban growth boundary amendment as permitted in OAR 660-024-0020(1)(d), or the area was exempted from this rule but the local government has a subsequently acknowledged TSP amendment that accounted for urbanization of the area.

Findings: Pursuant to OAR 660-024-0020, the proposed UGB amendment is exempt from transportation planning rule requirements under OAR 660-012-0060 because the land that will be added will remain under Clackamas County zoning upon entry into the Canby UGB. Development allowed under the [UAR] zone will not generate more vehicle trips than the development allowed under the current county zoning designations that apply to the properties proposed for UGB inclusion.

ORS 660-024-0050, Land Inventory and Response to Deficiency

> Including but not limited to this subsection: *(4) If the inventory demonstrates that the development capacity of land inside the UGB is inadequate to accommodate the estimated 20-year needs determined under OAR 660-024-0040, the local government must amend the plan to satisfy the need deficiency, either by increasing the development capacity of land already inside the city or by expanding the UGB, or both, and in accordance with ORS 197.296 where applicable. Prior to expanding the UGB, a local government must demonstrate that the estimated needs cannot reasonably be accommodated on land already inside the UGB. If the local government determines there is a need to expand the UGB, changes to the UGB must be determined by evaluating alternative boundary locations consistent with Goal 14 and applicable rules at OAR 660-024-0060 or 660 024-0065 and 660-024-0067.*

Findings: The September 2026 Urban Growth Boundary Expansion Report documents the need for the Canby urban

UGB Expansion September 16, 2026 City Council Hearing Approval

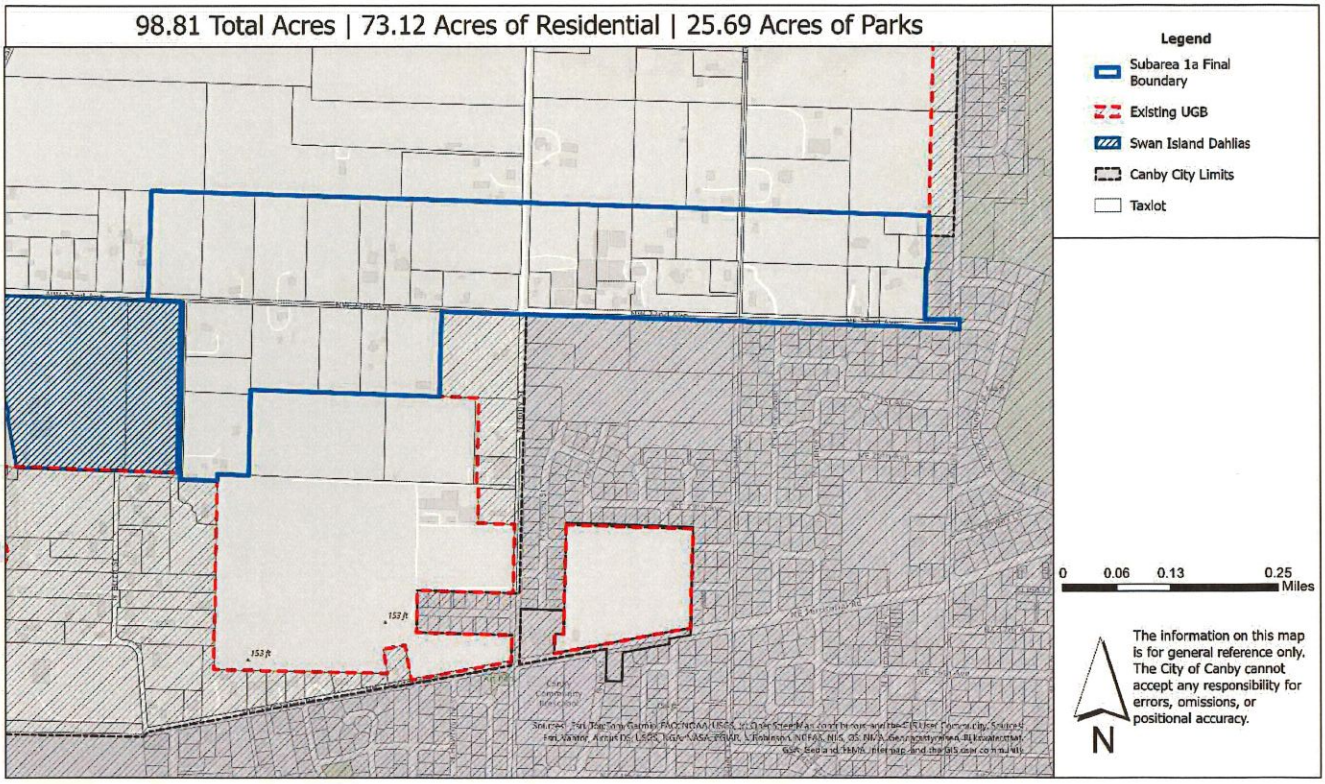
- Total land need up to 538 acres.
- UGB Recommendation up to 512.3 gross acres and 488.4 unconstrained acres (assuming all 98.8 acres of land from Subarea 1a come into the UGB, 73.1 acres of residential required and up to 25.7 acres of park land). This assumes that there will be no neighborhood commercial designated land in Subarea 1a.

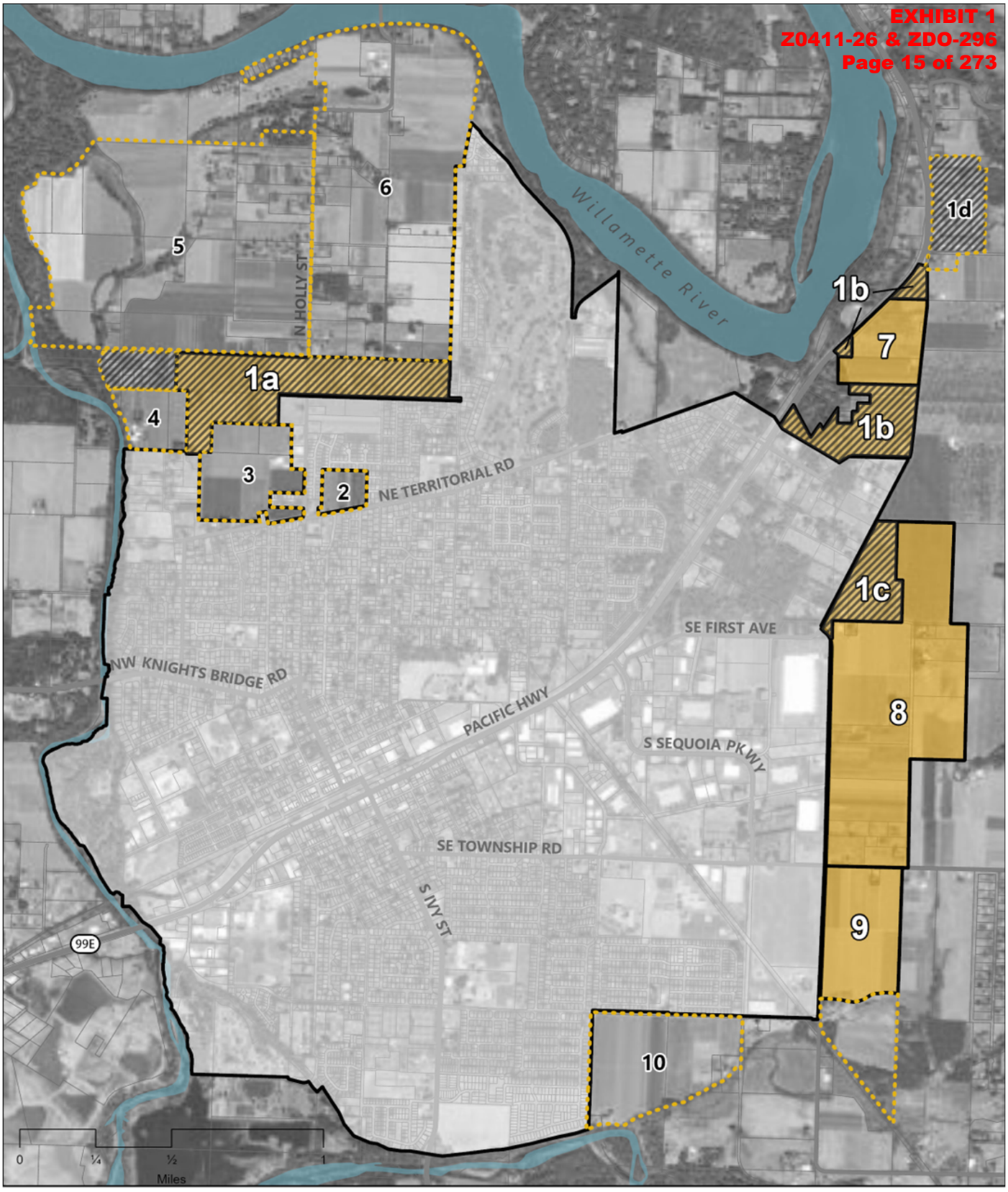
The Canby City Council approved a 512.3 acres urban growth boundary expansion with the following urban growth boundary expansion areas: A total 98.81 acres in Subarea 1a (73.12 acres for residential and 25.69 acres of park land). Also, the urban growth boundary expansion included Subareas 1b, 1c, 7, 8 and the northern portion of subarea 9 (60.8 acres) for employment lands, totaling 413.5 acres. Maps of the subarea are shown below.

Further details are provided in the September 2026 Urban Boundary Report. The city council second reading will be on October 7, 2026 and final findings will be provided to Clackamas County after the final findings are completed. The urban growth boundary process has been occurring over the last three years and has involved substantial community involvement and has been largely supported by the community. Canby requests that Clackamas County approve the urban growth boundary expansion and is available to answer any questions.

Ryan Potter, AICP, Planning Manager for
Don Hardy, Planning Director

City of Canby | Area 1A





UGB
UGB Study Area
2026 UGB Expansion Recommendation
Exception Lands

City of Canby
Urban Growth Boundary Expansion Report

September 2026

3J CONSULTING

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Executive Summary

The City of Canby has experienced consistent population increases over the last 20 years, prompting a series of analyses to identify economic and residential growth trends and opportunities. These are documented the Canby 2023 Economic Opportunity Analysis (EOA), and 2024 Housing Needs Analysis (HNA). The analyses identify a land deficit to accommodate 20 years of growth within the current Urban Growth Boundary (UGB). The preliminary land need was 545.6 acres, including: 73.1 acres of residential land need identified in the HNA, 446.8 acres of employment land need identified in the EOA, and 25.7 acres of park land need based on the City's aspirational level of service.

Land use efficiency measures reduced the employment need to 439.2 acres resulting in a total land need of 541.6 acres, as shown in Table ES1.

Table ES1. Canby Residential and Employment Land Need

Land Use	Land Need
Residential (including public facilities)	73.1 acres
Parks	25.7 acres
Employment (including commercial and industrial properties and public facilities)	439.2 acres
Total Preliminary UGB Expansion Land Need	538.0 acres

In compliance with the policy framework in the State of Oregon, the City has initiated the process for a UGB expansion to accommodate the 20-year land need. Following Oregon Administrative Rules (OARs), the City created a Preliminary Study Area where all lands within a one-and-a-half-mile radius were considered for the expansion of the UGB. After excluding certain lands from the Preliminary Study Area that were not appropriate for an urban level of service or use, the Study Area contained 1,555 acres.

Once the final Study Area was established, the City followed State rules to prioritize lands within the Study Area for inclusion in the proposed UGB expansion. First priority lands include non-resource, and exception lands that are not designated as rural reserves. There are approximately 239 gross acres of first priority lands, less than the land deficit of 542 acres.

The next priorities for UGB inclusion are low value farmland (third priority) followed by high value farmland (fourth priority). The City values farmland as an important resource in the region and understands that farmland is of great significance to the State economy. State rules dictate a process for establishing farmland value based on soil types and capability class. The Canby UGB expansion analysis determined that nearly all of the 1,355 acres of non-exception land within the Study Area is high value farmland, and therefore of equal priority for inclusion in the UGB expansion as fourth priority lands.

Since the 1,316 acres of non-exception land within the Study Area exceeds the remaining land need, State rules require a Goal 14 boundary location analysis to determine what land will be included in the UGB expansion. Goal 14 Boundary Location Factors include: efficient accommodation of the identified land need; orderly and economically sound provision of public facilities and services; comparative environmental, energy, economic, and social consequences of expansion lands; and compatibility of expansion lands with surrounding and nearby agricultural and forest activities.

Urban Growth Boundary Amendment Recommendation

First Priority: Exception Lands

Subareas 1a, 1b, 1c, and 1d are the first priority for adding to the Canby UGB. The City recommends the following for each first priority subarea.

Subarea 1a
Located in the northwest portion of the Study Area, the 115.9 unconstrained acres in Subarea 1a are more than enough land to accommodate the entire 73.1 acres of residential need and 25.7 acres of park land. The City will need to decide how many acres of park need will be accommodated in this subarea. Any remaining lands will be left out of the Canby UGB as the area is unsuitable for employment uses.

Recommendation: Add 73.1 acres from Subarea 1a to the UGB to accommodate the entire residential land deficit.

Recommendation: Add 25.7 acres of park land from Subarea 1a to the UGB to accommodate some or all of the park land deficit.

Subarea 1b
Since the City's entire residential need is accommodated in Subarea 1a, the 50.0 acres in Subarea 1b will need to be brought in as employment lands.

Recommendation: Add the 50.0 acres (42.3 unconstrained acres) in Subarea 1b to the UGB to accommodate a portion of the employment land deficit. This area could also include parks.

Subareas 1c
Since the City's entire residential need is accommodated in Subarea 1a, the 34.3 unconstrained acres in Subarea 1b will need to be brought in as employment lands.

Recommendation: Add the 34.3 unconstrained acres in Subareas 1c to accommodate a portion of the employment land deficit. This area could also include parks.

Subarea 1d
The 39.0 acres in Subarea 1d are not ready for efficient urban development. The subarea contains a manufactured home park, cemetery, and historic structure, leaving very little buildable land. Connectivity to transportation infrastructure to the southwest is limited by the need for significant urban upgrades along Haines Road and at the OR 99E intersection with Haines Road. Existing infrastructure is not suitable for more intensive development and would require utility extensions.

Recommendation: Do not add any land from Subarea 1d into the Canby UGB.

Fourth Priority: High Value Farmland

The following subareas are candidates to accommodate some or all of the employment land need 439.2 acres. The City recommends the following for each fourth priority subarea.

Subarea 2
Located entirely within city limits, the 13.0 unconstrained acres in Subarea 2 are appropriate for residential development. The subarea has the potential to tie into existing Canby transportation, water, sewer, and stormwater infrastructure. Residential development in Subarea 2 would promote good urban form and the parcels that surround it have been developed as residential subdivisions. However, the City's entire residential land need can be accommodated on first priority lands.

It is possible for the City to add Subarea 2 to the UGB through a Goal 3, 11, and 14 irrevocably committed exception process. An "irrevocably committed" exception does not require demonstration of land need; instead, it can be added to the UGB because it is irrevocably committed to urban uses. OAR 660-004-0028 contains criteria for this type of exception.

If the City uses a goal exception to add this subarea before or at the same time as the larger UGB amendment, the UGB expansion report would need to factor in the 13 acres of land provided here, reducing the land needed in other subareas.

Recommendation: Do not add any land from Subarea 2 into the Canby UGB.

Subarea 3

Surrounded on three sides by Canby city limits and adjacent to residential development, the 60.8 unconstrained acres in Subarea 3 are appropriate for residential development. It has the potential to tie into the existing transportation, water, sewer, and stormwater infrastructure, with some transportation connectivity limitations to the south. However, the City's entire residential land need can be accommodated on first priority lands.

Subarea 3 is located between the existing UGB and part of subarea 1a. The City could rely on OAR 660-024-0067(3)(a) regarding the inclusion of "small" priority 4 areas in a UGB:

> *(3) Notwithstanding section (2)(c) or (d) of this rule, land that would otherwise be excluded from a UGB may be included if:*
>
> *(a) The land contains a small amount of third or fourth priority land that is not important to the commercial agricultural enterprise in the area and the land must be included in the UGB to connect a nearby and significantly larger area of land of higher priority for inclusion within the UGB; or*

Subarea 1a lies north of the Holly Street Development Concept Plan Area boundary and appears to be serviceable by sewer and water line extensions in the Holly Street right of way, which is already inside the UGB. If the City can demonstrate that parts of Subarea 3 are needed to connect to parts of Subarea 1a due to the need for efficient development patterns and infrastructure extensions, a portion of subarea 3 could be added to the UGB.

However, given the City's plans for utilities in Holly Street extending up to 22nd Avenue, as described in the Holly Street Development Concept Plan, this may not be possible.

If all of Subarea 1a is added to the UGB, Subarea 3 would become a "hole" in the UGB. In future UGB amendments, it is likely that subarea 3 would be added to the UGB either through a goal exception or because it will be highly suitable based on a Goal 14 analysis.

If the City uses a goal exception to add this subarea before or at the same time as the larger UGB amendment, the UGB expansion report would need to factor in the 61 acres of land provided here, reducing the land needed in other subareas.

Recommendation: Do not add any land from Subarea 3 into the Canby UGB.

Subarea 4

Subarea 4 (27.8 acres) is home to Swan Island Dahlia Farm, which is an important social, cultural, and economic institution in Canby with farm and commercial operations. It requires more urban standard roadway upgrades in the existing UGB to provide accessible, safe, and convenient multimodal access to essential destinations in the established portion of Canby. It does not have good access to existing infrastructure.

Recommendation: Do not add any land from Subarea 4 into the Canby UGB.

Subarea 5
Of the 392.5 acres in Subarea 5, 206.3 acres are unconstrained and appropriate for residential development, but it is not currently ready for efficient residential development since the subarea is not adjacent to Canby's UGB. It has potential to connect into the existing Canby transportation infrastructure, but not as well as Subareas 2 or 3 as more urban standard roadway upgrades would be required. It does not have good access to existing infrastructure. In addition, the City's entire residential land need can be accommodated on first priority lands.

Recommendation: Do not add any land from Subarea 5 into the Canby UGB.

Subarea 6
292.9 of the 345.8 acres in Subarea 6 are unconstrained and appropriate for residential development. The eastern portion of the subarea abuts Canby city limits and is adjacent to residential development so it would promote good urban form. It has good potential to tie into existing transportation infrastructure with multiple north-south travel routes but would require urban standard roadway upgrades. It has access to water, sewer, and stormwater infrastructure. However, the City's entire residential land need can be accommodated on first priority lands.

Recommendation: Do not add any land from Subarea 6 into the Canby UGB.

Subarea 7
Subarea 7 is 40.5 acres and includes 38.7 acres are unconstrained and appropriate for industrial development. It does not currently abut city limits but is surrounded by exception land (Subarea 1b) that will be brought into the UGB for employment uses as described above. Connectivity to established infrastructure in the existing UGB to the southwest is limited by the need for significant urban upgrades along Haines Road and at the OR 99E intersection with Haines Road. It will require utility extensions through Subarea 1b for water and sewer infrastructure.

Recommendation: Add Subarea 7 (40.5 acres) to the UGB, including 38.7 unconstrained acres to accommodate a portion of the employment land deficit. This area could also include parks.

Subarea 8
213.5 of the 227.9 acres in Subarea 8 are unconstrained and appropriate for industrial development. 14.5 acres are constrained by a historic landmark and land with slopes greater than 10%. The western boundary of Subarea 8 abuts city limits and northern boundary abuts Subarea 1c. It is adjacent to industrial development and farm uses. Subarea 8 has strong regional mobility potential due to its proximity to nearby arterial and collector roadways, and multiple connections to OR 99E. Subarea 8 has access to existing or planned water and sewer services, but there is no existing stormwater infrastructure.

Recommendation: Add Subarea 8 (227.9 acres) to the UGB, including 213.5 unconstrained acres to accommodate a portion of the employment land deficit. This area could also include parks.

Subarea 9
Of the 112.0 acres in Subarea 9, 68.0 are unconstrained and appropriate for industrial development. 43.1 acres fall within a Goal 5 stream buffer and the 100-year floodplain. The western boundary of Subarea 9 abuts city limits. It is adjacent to industrial development and farm uses. Subarea 9 has strong regional mobility potential due to its proximity to nearby arterial and collector roadways, and multiple connections to OR 99E. Subarea 9 has access to existing or planned water and sewer services, but there is no existing stormwater infrastructure.

Recommendation: Add 60.8 acres of Subarea 9 to the UGB to accommodate a portion of the employment land deficit. This area could also include parks.

Subarea 10
Subarea 10 has 94.8 unconstrained acres that are appropriate for residential or industrial development and ready for efficient urban development as it abuts Canby city limits to the north and west. It has strong potential to tie into transportation infrastructure with limited urban upgrades. The subarea has existing or planned water, sewer, and stormwater infrastructure. It's adjacent to residential development, farm uses, and the Canby Rod & Gun Club property.

Recommendation: Do not add any land from Subarea 10 into the Canby UGB at this time as it may be more appropriate for future residential use.

Table ES2. UGB Expansion Recommendation by Subarea

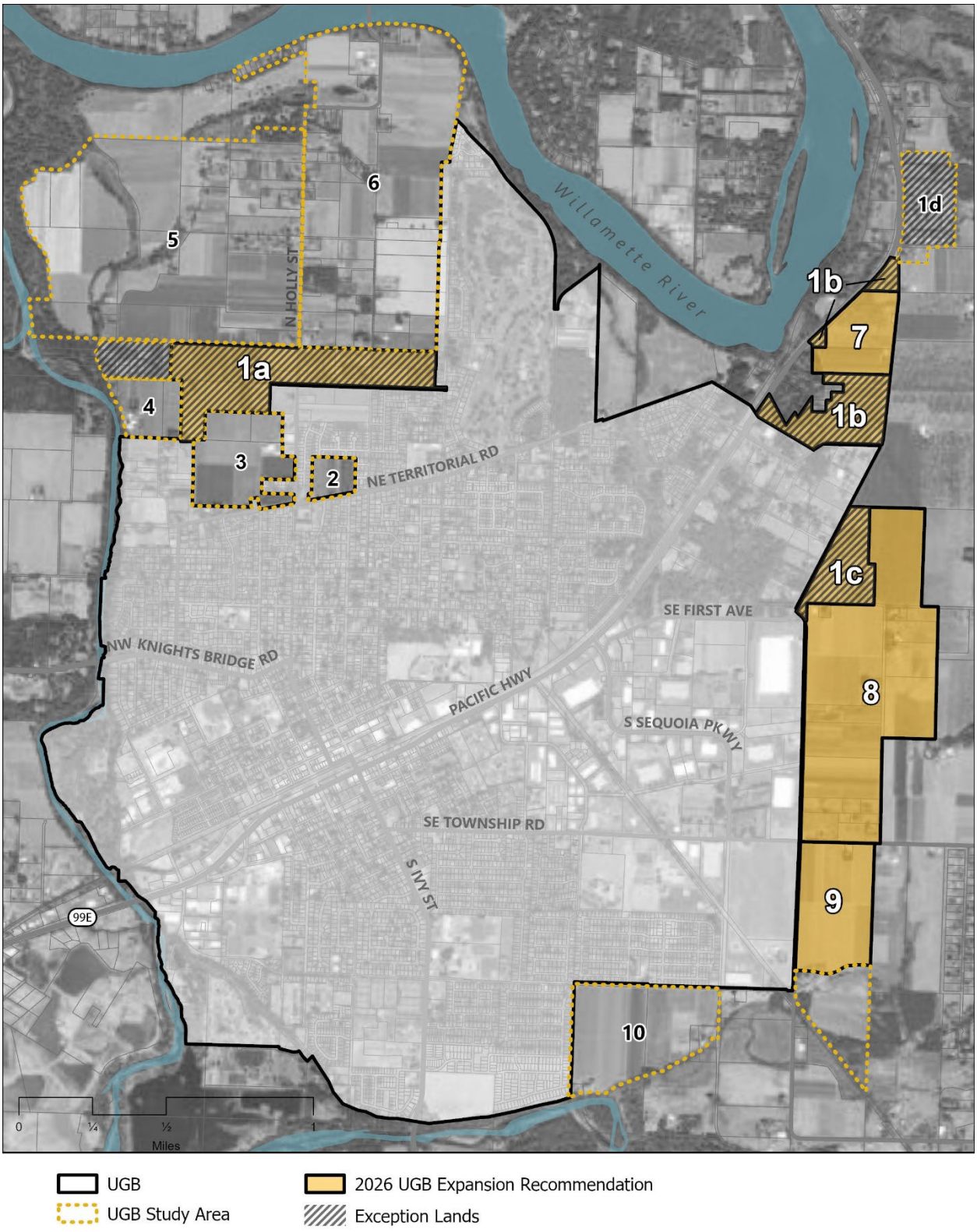
Subarea	Gross Acres	Gross UGB Acres	Unconstrained Residential Acres	Unconstrained Park Acres	Unconstrained Employment Acres	Total Unconstrained Acres
1a	115.9	98.8	73.1	25.7		98.8
1b	50.0	50.0			42.3	42.3
1c	34.3	34.3			34.3	34.3
1d	39.0					
2	13.0					
3	60.8					
4	27.8					
5	392.5					
6	345.8					
7	40.5	40.5			38.7	38.7
8	227.9	227.9			213.5	213.5
9	112.0	60.8			60.8	60.8
10	95.9					
TOTAL	**1,555.4**	**512.3**	**73.1**	**25.7**	**389.6**	**488.4**

As shown in Table 33, the Canby UGB Expansion Recommendation is for 488.4 acres, including 73.1 acres for residential needs, 25.7 acres for park needs, and 389.6 acres for employment needs. The 488.4-acre total of unconstrained land is 23.9 acres less than the identified land need.

Table 33. UGB Expansion Recommendation by Subarea

Land Use	Land Need	UGB Expansion Recommendation	
		Gross Acres	Unconstrained Acres
Residential	73.1 acres	73.1 acres	73.1 acres
Parks	25.7 acres	25.7 acres	25.7 acres
Employment	439.2 acres	413.5 acres	389.6 acres
TOTAL	**538.0 acres**	**512.3 acres**	**488.4 acres**

Figure ES1. Urban Growth Boundary Expansion Recommendation



1. Introduction

Population increases in Canby, Clackamas County, and Oregon have remained steady for the past 20 years. According to Portland State University's Population Research Center (PRC), the trend will continue. The 2022 PRC forecast for Canby shows the population within Canby's Urban Growth Boundary (UGB) increasing by approximately 6,000 new residents by the year 2043, bringing the total to nearly 25,000.

Canby's 2023 Economic Opportunities Analysis (EOA) identifies a deficit of 446.8 acres to meet employment land needs through 2043, including land for infrastructure. This number was reduced to 439.2 acres through efficiency measures. The City's Housing Needs Analysis (HNA) identifies a need for 73.1 acres, including land for infrastructure, schools, and other public facilities. The City also identified a need of 25.7 acres for parks based in part on the City's aspirational level of service (LOS) in the adopted 2022 Comprehensive Parks and Recreation Master Plan. The combined estimate is for 538.0 acres to meet the City's 20-year land need.

This Urban Growth Boundary Expansion Report follows the guidance provided by Statewide Planning Goal 14: Urbanization, which incorporates the requirements of ORS 197A.300 to 197A.325 Amendment of Urban Growth Boundary Outside Metro. The report answers the following questions to justify an urban growth boundary (UGB) expansion for Canby: Is any additional land needed for one or more urban uses, and if so, how much? If additional land is needed, how much can be accommodated within the current UGB? If additional land is needed outside the UGB, where is the best place to expand the boundary? What other amendments are needed to comply with the Statewide Planning Goals?

The Canby UGB Expansion Report provides information to meet the following steps in the UGB expansion process:

1. Establish Land Need
2. Establish Study Area
3. Analyze Study Area
    a. Establish Parcel Prioritization
    b. Apply Suitability Analysis
    c. Apply Goal 14 Location Factors
4. Evaluate Urbanization Potential

Policy Framework

Statewide Planning Goal 14: Urbanization guides UGB expansions in Oregon. The purpose of Goal 14 is "to provide for an orderly and efficient transition from rural to urban land use, to accommodate urban population and urban employment inside urban growth boundaries, to ensure efficient use of land, and to provide for livable communities."

To amend a UGB, a city must complete a boundary location analysis, comparing alternative locations and considering which addition to the UGB will result in the most accommodating and cost-effective boundary, while creating the fewest conflicts with neighboring land uses, and causing the fewest negative environmental and economic impacts.

Through discussions with staff from the Department of Land Conservation and Development (DLCD), the City determined that the Standard Method for UGB expansions best suits Canby. The Standard Method is governed by Oregon Administrative Rule (OAR) 660-024. The rule regulates how to establish a Study Area to evaluate land for inclusion in the UGB and the priority

of land for inclusion in the UGB. In addition, the four boundary location factors of Goal 14 must be applied. OAR 660-024 has been amended, but Canby is working under the version that is effective through December 31, 2026.

Canby has also enrolled in the Sequential Method for UGB expansions. Oregon Administrative Rule (OAR) 660-025-0185 and Oregon Revised Statutes (ORS) 197.626(3) govern the Sequential Method. This allowed the City to adopt the EOA and HNA in advance of a UGB expansion.

The 1992 Clackamas County – City of Canby Urban Growth Management Agreement (UGMA, Appendix A) establishes a site-specific Urban Growth Management Boundary (UGMB) that includes unincorporated land within Canby's UGB, and procedures for City and County governance of the unincorporated areas within the UGMB. The UGMA does not stipulate any specific procedure for amending the UGMA and/or the UGMB other than a general description of planning and coordination responsibilities.

Relevant Clackamas County Comprehensive Plan, Land Use: Urbanization policies include:

4.A.2 Coordinate with affected cities in designating urban areas outside of Metro. Land designated as a Rural Reserve, as shown on Map 4-9, shall not be designated as an Urban Reserve or added to an urban growth boundary. The following areas may be designated as Urban:

4.A.2.1 Land needed to accommodate 20 years of future urban population growth.

4.A.2.2 Land needed for increased housing, employment opportunities and livability from both a regional and subregional view.

4.A.2.3 Land to which public facilities and services can be provided in an orderly and economic way.

4.A.2.4 Land which insures efficient utilization of land within existing urban areas.

4.A.2.5 Land which is best suited for urban uses based on consideration of the environmental, energy, economic and social consequences.

4.A.2.6 Agricultural land only after considering retention of agricultural land as defined, with Class I having the highest priority for retention and Class VI the lowest priority.

4.A.2.7 Land needed after considering compatibility of proposed urban uses with nearby agriculture activities.

4.A.2.8 Land where the strategic location of employment and living opportunities can minimize commuting distance, traffic congestion, pollution and energy needs.

4.A.3 Land use planning for urban areas shall integrate all applicable policies found throughout the Plan including the following:

4.A.3.1 Locate land uses of higher density or intensity to increase the effectiveness of transportation and other public facility investments.

4.A.3.2 Encourage infilling of Immediate Urban Areas with a minimum of disruption of existing neighborhoods (see infill policies in the Housing Chapter).

4.A.3.3 Enhance energy conservation and transportation system efficiency by locating opportunities for housing near work and shopping areas.

4.A.3.4 Integrate developments combining retailing, office, and medium and high density housing at places with frequent transit service and pedestrian facilities.

4.A.4 Establish Urban Growth Management Areas and Urban Growth Management Agreements to clarify planning responsibilities between the County and cities for areas of mutual interest.

4.A.5 Establish agreements with cities and service districts to clarify service and infrastructure responsibilities for areas of mutual interest.

The Canby Comprehensive Plan also governs UGB expansions and implements the UGMA. The Urban Growth Element of Canby's Comprehensive Plan [1] includes two goals: 1. To preserve and maintain designated agricultural and forest lands by protecting them from urbanization; 2. To provide adequate urbanizable area for the growth of the city, within the framework of an efficient system for the transition from rural to urban land use.

Relevant Canby Comprehensive Plan, Urban Growth Element policies include:

1.1 Coordinate growth and development plans with Clackamas County as defined in the Clackamas County-City of Canby Urban Growth Management Agreement (UGMA), and other government and tribal agencies.

Strategies

1.1.1 Periodically review and update the UGMA. Proposed changes to the urban growth management area shall be based upon an analysis of both short-term and long-term need for urban expansion in accordance with state law. This area, lying immediately outside the Urban Growth Boundary, represents the general geographical area where Canby and Clackamas County will continue to coordinate planning activities, including those pertaining to requests for changes in land use.

1.1.2 Comprehensive Plan changes for the unincorporated areas within the Urban Growth Management Boundary will be coordinated City-County planning efforts.

1.1.3 Take an active role in the land use planning and development process for lands located in the urban growth management area. Intergovernmental agreements with Clackamas County will be used for planning, land division, land uses, and management of land uses and provision of public facilities and services within the area of interest.

1.1.4 Provide timely notice to DLCD of annexation and UGB amendments, as required in OAR 660-018.

1.2. Use accepted growth management techniques in a manner that will implement the Comprehensive Plan vision, goals, and policies.

Strategies

1.2.1 Update and amend the Urban Growth Boundary when conditions satisfy adopted local and state standards for urban growth boundary amendments.

1.2.2 Areas eligible for annexation should be located within the Canby Urban Growth Boundary and contiguous to the existing city limits.

[1] The Canby Comprehensive Plan is currently being updated but will continue to implement the UGMA.

1.2.3 An adequate quantity and quality of urban services must be available to serve the subject site, or have evidence that it is feasible that adequate urban services can be made available within a reasonable period of time after annexation. Increased levels of urban service shall not place unreasonable burdens on the service providers or existing users. An adequate level of urban services shall be defined as:

- Municipal sanitary sewer and water service
- Power and other private utility service
- Multimodal roads with an adequate design capacity for the proposed use and projected future uses
- Police and Fire
- School facilities and services

The burden of providing the above findings is placed upon the applicant.

1.2.4 Where such public facilities as sewer and water lines are provided within a road right-of-way, annexation should be encouraged simultaneously on both sides of the road to assure maximum efficiency in the use of those services and to reduce development costs.

1.3 Ensure the efficient and effective provision of infrastructure to serve newly annexed areas.

Strategies

1.3.1 Canby's Annexation Development Map should continue to require Development Concept Plan (DCP) for properties for annexed properties to ensure adequate city infrastructure and development patterns.

Process Overview

The UGB Expansion project commenced in January 2023. A Project Advisory Committee (PAC) convened to guide the process and make recommendations for Planning Commission and City Council consideration. The PAC met 7 times through June 2026. All meetings were noticed and open to the public, The PAC reviewed the Preliminary and Final UGB Study Area, parcel prioritization, draft Goal 14 Boundary Location Analysis, and the revised Goal 14 Analysis with UGB expansion recommendation.

The PAC is made up of the following representatives:

- Mayor Brian Hodson
- City Councilor Jason Padden
- Jason Bristol
- Kari Duncan
- Matt English
- Dan Ewert
- Tony Helbling
- Hether Hill
- Sam Johnston
- Ray Keen
- Ron LeBlanc
- Mitch Magenheimer
- Sarah Magenheimer
- Ethan Manuel
- Mindy Montecucco
- Cindy Moore
- Susan Myers
- Kirk Olsen
- Jennifer Patterson
- Tom Scott
- Audrey Traaen
- Ben Wiley

The Technical Advisory Committee (TAC) consists of City Department staff, county staff, and state agency representatives, as well as members of other transportation organizations. The TAC met 4 times through June 2026. TAC members reviewed the final UGB Study Area, parcel prioritization, Land Use Efficiency Measures, draft Goal 14 Boundary Location Analysis, and the revised Goal 14 Analysis with UGB expansion recommendation.

The TAC is made up of the following representatives:

- Don Hardy, City of Canby
- Jerry Nelzen, City of Canby
- Ryan Potter, City of Canby
- Jeff Snyder, City of Canby
- Heidi Muller, Canby Area Transit
- Matt English, Canby Fire
- Karen Buehrig, Clackamas County
- Stephen Williams, Clackamas County
- Kelly Reid, DLCD
- Seth Brumley, ODOT
- Debbie Martisak, ODOT Freight Mobility
- Avi Tayar, ODOT

Community Summits

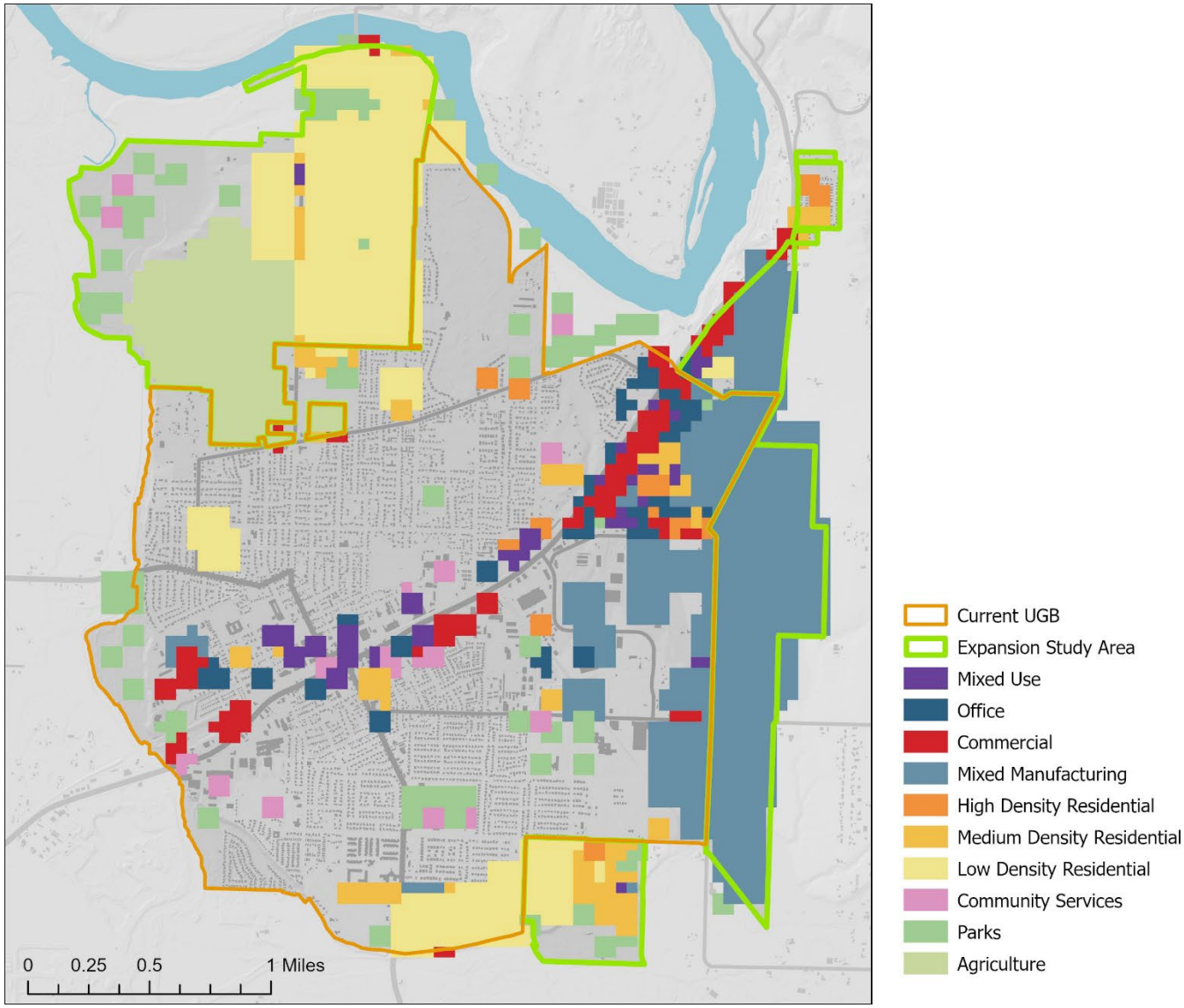
At key milestones in the project. Community Summits engaged the public around a potential UGB expansion for Canby. At two of the summits, a mapping activity was used to gather feedback from community members on the location, land uses, and residential densities of a potential UGB expansion. The mapping activity included information about known opportunities and constraints of land within the UGB Expansion Study Area and stickers were designed to mimic land use designations and with densities necessary to meet the forecasted need. It was also used to gain feedback from the community on needed improvements to local systems and infrastructure.

An online mapping activity was provided on the *Cultivating Canby* website for community members unable to attend an in-person summit. It asked participants to place "pins" where they would like to see different types of development occur. The map included both city boundaries and the UGB Study Area. Development patterns supported by participants were very similar to those indicated at the in-person summits.

- Community Summit #2 occurred in November of 2023 and hosted approximately 150 people.
- Community Summit #3 occurred in January of 2024 and hosted approximately 50 people
- Online mapping exercise garnered approximately 44 placements for desired development types from November of 2023 to February of 2024.

Figure 1 is a composite of land use vision maps created at Summits #2 and #3.

Figure 1. Cultivating Canby Summits Composite Map



Source: Canby Community Summits #2 and #3.

Summit participants placed residential uses in the northwest portion of the Study Area, and spoke about preserving farmlands for the northwest portion of the UGB Study Area, specifically focusing on Swan Island Dahlias and associated nurseries. Participants generally located manufacturing and industrial uses in the eastern and southeastern portions of the UGB Study Area. Participants placed commercial uses and mixed use development along Highway 99E. Participants also grouped office uses, commercial uses, high and medium density residential uses, and community services together. These clusters generally occurred in the eastern and southern regions of the city, moving into the UGB Study Area.

Participants identified street improvements, including the Walnut Street Extension and improvements to Highway 99E. They also advocated for the creation of Canby's "Emerald Necklace" trail system to increase accessibility and convenience by connecting existing parks, trails, and greenways. Connecting the Logging Road Trail with Molalla River State Park was a goal of many community members. Participants also discussed traffic modifications, such as creating roundabouts, providing an overpass or underpass for Canby's train tracks, and creating a bypass around Canby.

Questionnaire respondents located low density residential in the northern region of the UGB Study Area and mixed use development along the Willamette River, near the Canby Ferry, as some wanted to see waterfront businesses with housing above. Respondents located mixed manufacturing and some office space in the eastern portion of the UGB Study Area. Medium and high density residential was located along Highway 99E, in downtown Canby, and in the southern portion of the UGB Study Area. Respondents added parks in the northern and southern regions of the city near housing developments, noting that parks should be connected to trails and other open spaces.

At Summit #4, community members viewed a presentation of the final Study Area and parcel prioritization. Summit #5 was designed to accommodate Canby's Spanish speaking community members and covered a wide range of topics including the potential UGB expansion. At Summit #6, community members reviewed and provided feedback on the revised Goal 14 Analysis and UGB expansion recommendation. Summit #7 is scheduled for August 2026 to review the UGB expansion recommendation.

UGB Listening Sessions. The City hosted the first of three listening sessions in November 2023. The listening session provided an opportunity for property owners outside of city limits to ask questions about their properties and the overall process. To advertise for the first listening session, a postcard was sent out to addresses within the UGB Expansion Study Area, and approximately 50 people attended the first listening session. The City presented an overview of the UGB expansion process and maps of the Preliminary Study Area. The City also distributed a Frequently Asked Questions (FAQ) document to provide an overview of the UGB expansion process. The FAQ was updated to incorporate questions asked at the listening session and will continue to be updated throughout the project.

The second listening session was held in June 2024, where the City presented the final Study Area and parcel prioritization results. Property owners in the UGB Study Area asked more detailed questions about their properties due to a better understanding of parcel prioritization and a depiction of the Final Study Area.

At the third listening session in June 2026, more than 60 property owners reviewed and provided feedback on the revised Goal 14 Analysis and UGB expansion recommendation.

2. Establish Land Need

This chapter details the steps taken to establish Canby's land need:

- Analyze population growth forecast
- Identify residential land need
- Identify other land need, including parks, schools, and public facilities
- Identify employment land need
- Identify site characteristics of needed land

This analysis focuses on estimating the acres needed to accommodate the 20-year population forecast as set by the Portland State University Population Research Center (PRC). It addresses housing, employment, and additional factors including livability, parks, public facilities, and land and parcel suitability.

Population Growth Forecast

The land needed to accommodate the projected growth of residential and employment uses in the 20-year planning horizon is based on the official population forecast, housing type mix, and employment land needs identified in the City's adopted 2024 Housing Needs Analysis (HNA) and adopted 2023 Economic Opportunities Analysis (EOA). The EOA was adopted by City Council in September 2023 and the HNA was adopted by City Council in August 2024. Both studies were subsequently acknowledged by DLCD.

These two studies used the 2022 population forecast prepared by PRC, which projected a population of 24,586 in 2043. This is an increase of 5,931people from 2022, at an average annual growth rate of 1.3%. This growth rate is a larger population increase compared to Clackamas County as a whole.

Land Need: Residential and Public Facilities

The 2024 HNA states that population growth will require the addition of 2,286 new dwelling units between 2023 and 2043. The forecasted housing need of 2,286 dwelling units is partially addressed by 412 units currently in the development pipeline. Once pipeline developments are completed, the remaining housing demand over the next 20 years is expected to consist of 1,874 dwellings.

The forecasted housing mix to address the 20-year demand is expected to consist of: 555 standard lot detached homes, 596 small lot homes and cottages; 364 manufactured homes, townhomes, and plexes (2-4 units per structure); and 359 apartments or condominiums (5+ units per structure) and group quarters units.

These findings result in an overall residential UGB deficiency in Canby of 73.1 acres including right-of-way for roads and public facilities (23%), but not including parks.

Other Land Need: Schools

The City of Canby consulted with the Canby School District and was informed that the School District does not need any additional lands or facilities to accommodate 20-year growth.

Other Land Need: Parks

Land needed for parks, open spaces, and trails is based in part on the City's aspirational level of service (LOS) in the adopted 2022 Comprehensive Parks and Recreation Master Plan, which is 10 acres of parks per 1,000 residents, plus open spaces and trails to connect all residents to a park. Using this standard, estimated 2043 population growth of 5,931 people translates to 59.3 acres of developed core parks.

The City conducted a study of opportunities to develop additional park land within the current UGB. As shown in Table 1, there are three parcels that are city-owned and dedicated for parks but have not yet been developed: Ivy Ridge Park (0.8 acres), Auburn Farms Park (2.3 acres), and Faist Park (0.3 acres); a combined 3.4 acres. Additional city-owned parcels that may be used for future park use include the Walnut Street Extension property (2.4 acres after right-of-way is removed) and the Police Station/Honda Pits property (10.4 acres after the existing police station and skate park are removed); a combined 12.8 acres. In total, the City has identified 16.2 acres of potential park land within the existing UGB.

Table 1. Potential Park Land within Existing Canby UGB

Park	Tax Lot	Description	Acres
Ivy Ridge Park	41E04DC10400	Dedicated through Ivy Ridge subdivision. Ivy Ridge received parks SDC credits.	0.8
Auburn Farms Park*	31E28C0200	Identified as Dodds Park in the Parks and Recreation Master Plan.	2.3
Faist Park	41E03BD13400	Land dedicated as part of Faist 5 subdivision. Identified as Faist Park in the Parks and Recreation Master Plan.	0.3
Walnut St. Extension Property	31E34A01600	Right-of-way acres removed.	2.4
Police Station/Honda Pits	41E0500405	Police station and skate park acres removed.	10.4
Total			16.2

*Auburn Farms Park has been constructed and opened in August 2026

Subtracting 16.2 acres of potential park land within the current UGB from the 59.3 acres of identified need to accommodate population growth results in a net parks land need of 43.1 acres.

The City of Canby also examined the population growth park need relative to specific park projects and associated funding sources. As shown in Table 2, 76.9 acres of park projects appear in the 2026 Capital Improvement Plan based on existing budgetary capacity. Subtracting the 16.2 acres of potential parks to occur within the current UGB results in 60.7 acres of available park expansion. The employment land need includes 35.0 acres for a sports/recreation center, leaving 25.7 acres of park land to be accommodated in the UGB expansion area. While less than the total park land needed to accommodate 20 years of growth (43.1), the 25.7 acres included in the UGB amendment aligns with the City's available fiscal resources at the time of expansion.

Table 2. Canby UGB Parks Land Need

Description	Acres
2026 Capital Improvement Plan Parks Projects	76.9
Potential Park Land In Current UGB	16.2
Remaining Park Land Need	60.7
Employment Zone Athletic Facility	*35.0*
UGB Expansion Park Need	***25.7***

Land Need and Site Characteristics: Employment and Public Facilities

The 2023 Canby EOA estimates future employment land need including the number of sites required and typical site characteristics based on expected land uses (Statewide Planning Goal 9). The Canby City Council adopted the EOA on September 6, 2023, identifying the medium growth scenario deficit of 446.8 acres of employment land in the 20-year planning period (2023-2043), . as shown in Table 3. This includes 8.3 acres for commercial uses and 438.5 acres for industrial uses. These totals include an allowance for needed infrastructure right-of-way estimated at 25% of the acreage needed for employment uses.

Table 3. UGB Employment Land Needs (gross buildable unconstrained acres)

Land Use	Acres
Commercial (RC, DC, HC)	8.3
Industrial/Other Employment (CM, LI, HI)	438.5
Total Employment Land Need	446.8

In addition to the amount of land needed, the 2023 EOA also identifies target services and industries for future economic growth consistent with market trends and stakeholder priorities. These industry clusters include:

- Advanced Manufacturing: Energy Systems, Electronic Component Manufacturing, Fabricated Metal Product Manufacturing, Navigational, Measuring, Electromedical, and Control Instruments
- Food/Beverage Processing
- Health Care

The EOA identifies specific site suitability characteristics needed to accommodate these services and industries. Page 24 states, “In light of the fact that the remaining land supply within the City is primarily comprised of smaller tax lots (only 5 vacant commercial tax lots exist with over 1 acre in size), the City should explore strategies that support “special site” preferences for strategic uses, such as a new neighborhood shopping center, lifestyle center, hotel(s), and a medical/health campus that typically require sites ranging from 4-8 acres in size.” This also pertains to desired tourism-related facilities listed in the EOA, including trails, parks, camping/RV facilities, sports complex, and amphitheater.

The EOA goes on to say that city policies should “consider whether special site requirements are needed over the long-term that would require additional land area to be annexed in locations to accommodate large industrial uses that cannot be located on existing or planned industrial areas.”

Combined, the preliminary 20-year land need for residential and associated uses and employment land needs is approximately 549 acres, as shown in Table 4.

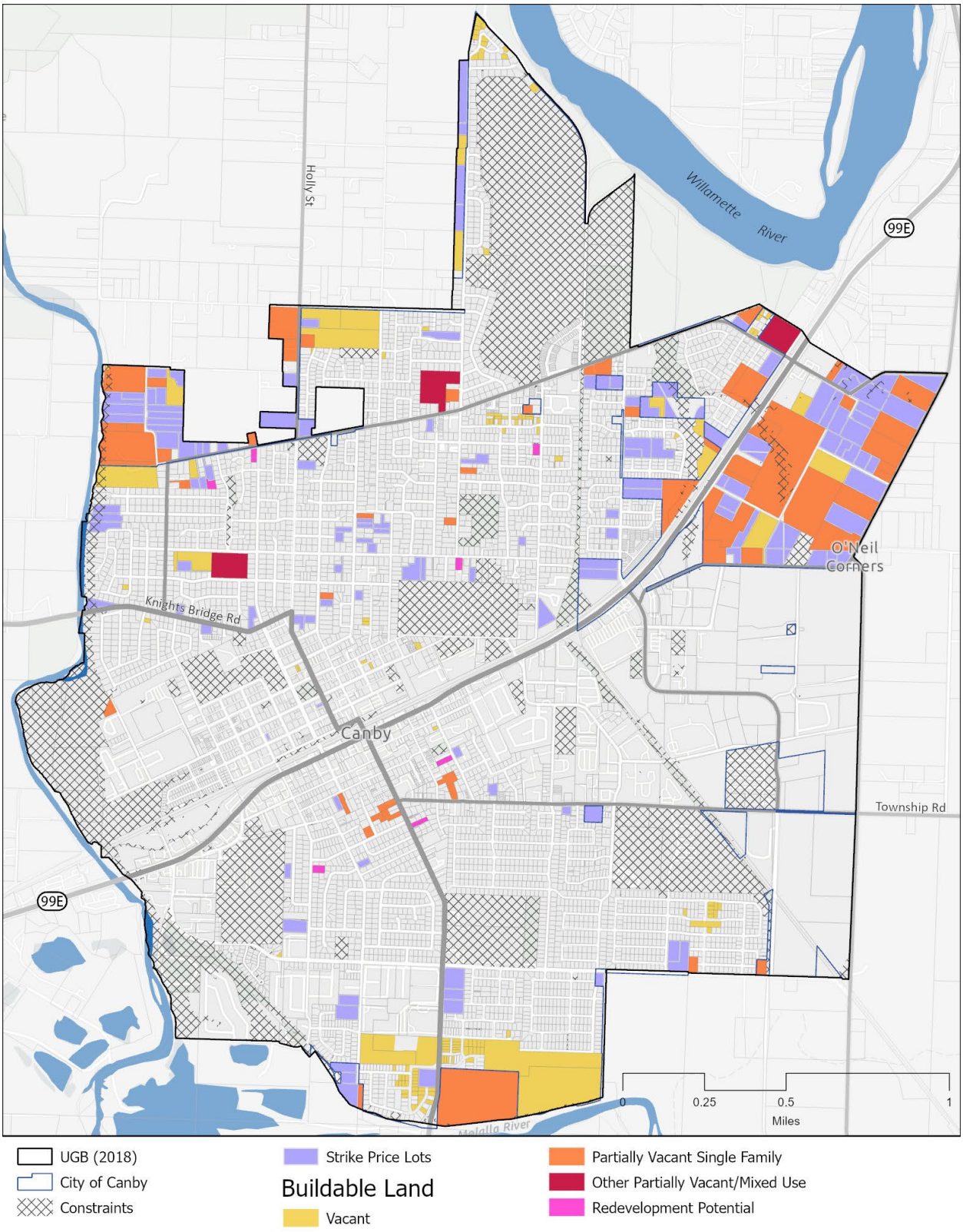
Table 4. Canby Preliminary Residential and Employment Land Need

Land Use	Land Need
Residential (including public facilities)	73.1 acres
Parks	25.7 acres
Employment (including commercial and industrial properties and public facilities)	446.8 acres
Total Preliminary UGB Expansion Land Need	545.6 acres

Examine Sites within Existing UGB

Prior to pursuing a UGB expansion, the City must demonstrate that the land need cannot reasonably be accommodated on land already inside the UGB. The City is required to evaluate opportunities to provide efficient development of residential land within the existing UGB. The 2024 HNA found that Canby has approximately 439 acres of buildable residential land inside the UGB, as illustrated on the Buildable Land Inventory map (Figure 2).

Figure 2. Residential Buildable Land Inventory



"Land use efficiency measures" increase the capacity for growth within the existing UGB thus reducing the need for UGB expansion. Canby previously adopted efficiency measures that provide additional housing production opportunities including:

- A provision in the zoning code (Chapter 16.82) that allows deviations from development standards for "Special Housing Projects for the Elderly or Handicapped."
- Mixed use development in a specifically defined Downtown Core area of the C-1 Zone is not required to provide parking.
- The R-2 (High Density) residential zone was amended to require a minimum density of 14 du/ac, preventing lower density development.
- The City amended its zoning code to allow duplexes in all low density residential zones to fully comply with HB 2001.

The City is currently pursuing the following land use efficiency measures:

Low Density Residential Zone (R-1)

- Allow cottage cluster developments as permitted use outright.
- Add minimum lot size and modified lot dimensions for townhouses as part of a PUD.
- Establish a maximum residential density standard of six (6) units per acre.
- Increase maximum impervious surface area to 60%.
- Require that townhouse developments shall not exceed six (6) consecutive attached dwellings separated by at least 10 feet if part of a PUD.

Medium Density Residential Zone (R-1.5)

- Allow cottage cluster developments as a permitted use outright.
- Allow fourplexes as a permitted use outright.
- Increase the maximum townhouse grouping from three (3) to six (6) dwelling units.
- Decrease the minimum townhouse lot size from 3,000 to 1,800 square feet as part of a PUD.
- Require that townhouse development shall not exceed six (6) consecutive attached dwellings in a row and that groupings should be separated by at least 10 feet.

Planned Unit Development (PUD)

- All uses permitted outright or conditionally may be permitted with a PUD.
- Allow uses to be spread across a PUD site, regardless of the underlying base zone.
- Create exception for cottage clusters in PUDs for the purpose of calculating the minimum open space requirement.
- Add approval criteria for a density bonus.
- Create exception that cottage cluster units do count toward maximum density allowance within a PUD.
- Allow the total base zone density to be spread throughout the PUD site, regardless of the underlying base zone.
- The 20% density bonus requires a minimum of 5% of the PUD dwelling units to be single-story with one accessible entrance.

Upzone Parcels within Area J

Area "J" is an 183-acre master planned area within the Canby UGB located northeast of the City and bounded on the west side by Highway 99E, SE 1st Avenue to the south, Haines Road to the east, and the UGB to the north. City Council recently confirmed that staff should pursue Comprehensive Plan Map changes for 56.8 acres within Area J. Proposed changes will reduce the number of acres designated Low Density Residential (LDR) and increase the number of acres designated Medium Density Residential (MDR), High Density Residential (HDR), and Commercial (C) as shown in Table 5.

Table 5. Canby Area J Comprehensive Plan Map Changes

Comprehensive Plan Designation	BLI Buildable Acres	New Buildable Acres	Net Change Buildable Acres
Low Density Res	36.56	20.20	-16.36
Medium Density Res	20.24	24.00	3.76
High Density Res		5.00	5.00
Commercial		7.60	7.60
Total	56.80	56.80	0.00

The Comprehensive Plan Map changes will result in a net increase of 43 dwelling units in the area, with 89 fewer single family detached units and an additional 129 middle housing units.

Table 6 shows that these changes:

- Increase the need for LDR by 8.8 acres, decrease the need for MDR by 3.8 acres, and decrease the need for HDR by 5.0 acres.
- Result in no change to the residential land need.
- Result in a 7.6 acre decrease of commercial land need.

Table 6. Canby UGB Expansion Land Need Adjustments

Land Use Categories	Comp Plan Designations	Preliminary UGB Land Need*	Area J Changes	Final UGB Land Need
Residential Categories				
Single Family Standard Lot	LDR	(22.62)		(22.62)
Single Family Small Lot & Cottages		(33.93)	(8.80)	(42.73)
Townhomes/Plexes (2-4 units)	MDR	(8.10)	3.80	(4.30)
Multifamily/Other	HDR/varies	(8.42)	5.00	(3.42)
Residential Subtotal		**(73.07)**		**(73.07)**
Employment Categories				
Commercial	RC, DC, HC	(8.30)	7.60	(0.70)
Industrial/Other	CM, LI, HI	(438.50)		(438.50)
Employment Subtotal		**(446.80)**		**(439.20)**

Source: FCS GROUP
**Derived from HNA and EOA*

The land use efficiency measures result in a 7.6-acre reduction to the commercial land need, bringing that total to less than one acre (0.70). Canby still has a deficit of 538.0 acres to accommodate projected growth over a 20-year planning period, including a residential deficit of 73.1 acres, a parks deficit of 25.7 acres, and an employment deficit of 439.2 acres as shown in Table 7.

Table 7. Canby Residential and Employment Land Need

Land Use	Land Need
Residential (including public facilities)	73.1 acres
Employment (including commercial and industrial properties and public facilities)	439.2 acres
Total Preliminary UGB Expansion Land Need	538.0 acres

3. Establish Study Area

This chapter establishes the Canby UGB Expansion Study Area evaluation to satisfy the land needs identified in Chapter 2. The process of establishing a study area is dictated by Oregon Administrative Rules, and includes the following:

- Establish Preliminary Study Area
- Exclude Lands from Preliminary Study Area
- Establish Study Area

Create Preliminary Study Area

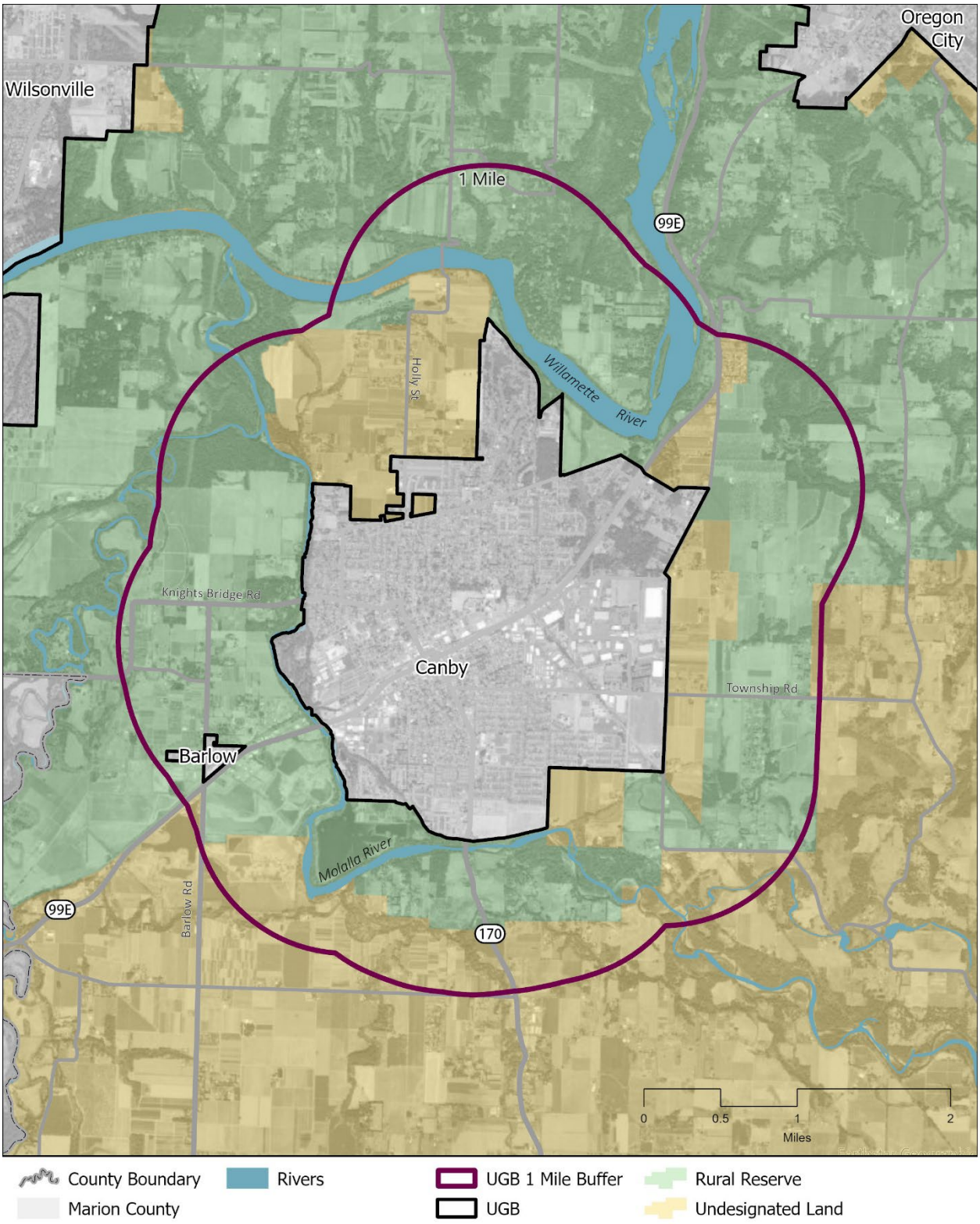
Rules for defining the area to be considered for expansion, known as the Preliminary Study Area, are established by OAR 660-024-0065. The provisions of the administrative rule state that the Preliminary Study Area must include all lands in the City's acknowledged urban reserves and land that is within a certain distance from the acknowledged UGB: one-half mile for jurisdictions of less than 10,000 and one mile for jurisdictions of more than 10,000, or land beyond specified distances at the discretion of the jurisdiction.

As of the 2020 PSU PRC population estimates, the City of Canby had a population of 18,171 residents [2], as stated in both the City of Canby's most recent HNA and EOA. Therefore, the City considered land within one mile of the current UGB, known as the "one mile buffer" for the Preliminary Study Area.

Canby has no urban reserves and is surrounded by a combination of rural reserves and "undesignated" areas, as illustrated in Figure 3.

[2] "2020 ANNUAL OREGON POPULATION REPORT TABLES," Population Research Center, Portland State University, April 15, 2023, https://www.pdx.edu/population-research/sites/populationresearch.web.wdt.pdx.edu/files/2023-04/2022%20Annual%20Population%20Report%20Tables%20.pdf.

Figure 3. Preliminary Study Area with Undesignated Lands and Rural Reserve Lands



The Canby UGB Expansion Preliminary Study Area contains “exception areas” with existing county zoning designations: Rural Residential Farm Forest 5-Acre (RRFF5), Rural Area Residential 2-Acre (RA2), and Rural Industrial (RI). Exception areas are rural lands that have the physical properties that make it suitable for farm or forest use but are approved by a county with an "exception” to zone the land for urban uses. Exception areas are lands that are either “physically developed" or "irrevocably committed" to non-farm and non-forest uses and have the appropriate corresponding county zoning. [3]

In determining the Preliminary Study Area, OAR 660-024-0065(1)(c) directs cities to include exception areas within the one-mile buffer, and exception areas within one and one-half miles from the current UGB that are contiguous to an exception area within the one-mile buffer.

The Preliminary Study Area for Canby contains exception areas within the established one-mile buffer that extend contiguously beyond that one mile. A secondary buffer was added to the Preliminary Study Area to demonstrate the additional half mile in accordance with OAR 660-024-0065(1)(c). These contiguous exception areas are generally located north of the existing UGB across the Willamette River, and to the northeast of the existing UGB abutting Highway 99E and the Willamette River, as illustrated below in Figure 4.

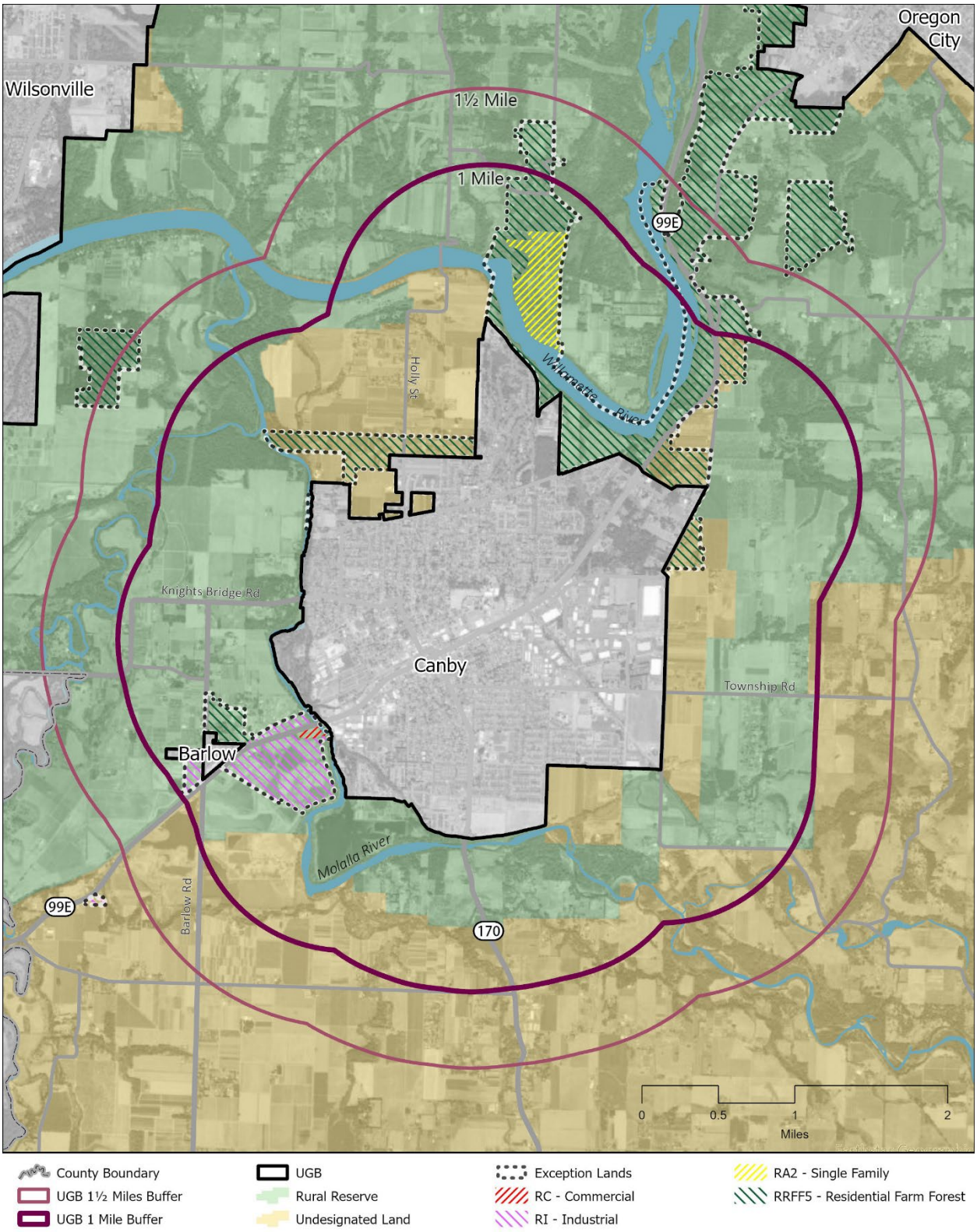
Some of the contiguous exception lands that are included in the Preliminary Study Area within the additional half mile buffer are designated as Rural Reserves. Rural reserves are intended to provide long-term protection for large blocks of agricultural land, forest land, and other important natural landscape features that limit urban development. [4]

Figure 4 illustrates the Undesignated Lands, Rural Reserves, and exception lands and demonstrates where there is overlap between the land categorizations. The contiguous exception area lands are shown grouped together with a dashed line in Figure 4.

[3] “Exception Areas,” Department of Land Conservation and Development: Rural Planning and Development: State of Oregon, accessed November 1, 2023, https://www.oregon.gov/lcd/rp/pages/index.aspx#:~:text=In%20some%20cases%2C%20a%20county,farm%20and%20non%2Dforest%20uses.

[4] “UGBs and Urban/Rural Reserves,” Department of Land Conservation and Development: State of Oregon, accessed November 1, 2023, https://www.oregon.gov/lcd/up/pages/ugbs-and-urbanrural-reserves.aspx.

Figure 4. Preliminary Study Area with Exception Areas Overlap



Exclusion of Lands from the Preliminary Study Area

The rules for establishing the Study Area allow for certain lands to be excluded from the Preliminary Study Area, as established in OAR 660-024-0065(4). The reasons for excluding from the Preliminary Study Area include:

- Lands are impracticable to provide necessary public facilities and services to;
- Lands are subject to natural hazards (flooding); or
- Lands contain specific scenic, natural, cultural or recreational resources.

The City of Canby determined that certain areas within the Preliminary Study Area meet the exclusion criteria of OAR 660-024-0065(4)(a & b) and may be excluded and no longer considered in the UGB Expansion. After completing an exclusion analysis, the City determined that some areas have overlapping criteria that meet the threshold for exclusion.

Areas excluded from the Preliminary Study Area include all rural reserves surrounding the existing UGB and lands across the Willamette River and Molalla River from the existing UGB that are undesignated. There is some overlap between lands considered undesignated and exception lands (based on their existing county zoning designation), and lands that are excluded. These lands are excluded due to their location and impracticability to be served.

Also excluded from the Preliminary Study Area are lands located within the Special Flood Hazard Area (SFHA) identified on the Flood Insurance Rate Map (FIRM).

Additional lands are excluded from the Preliminary Study Area based on the impracticability to provide them with necessary public facilities or services. This determination is based on existing steep slopes, impediments to service provisions based on the likely amount of development that could occur; and the likely cost of facilities and services.

The specific reasons for each exclusion and how these lands meet the thresholds for exclusion in OAR 660-024-0065(4)(a-c) and OAR 660-024-0065(7)(a-c) is discussed in further detail below.

Exclusion of Rural Reserves: Impracticable to Provide Services

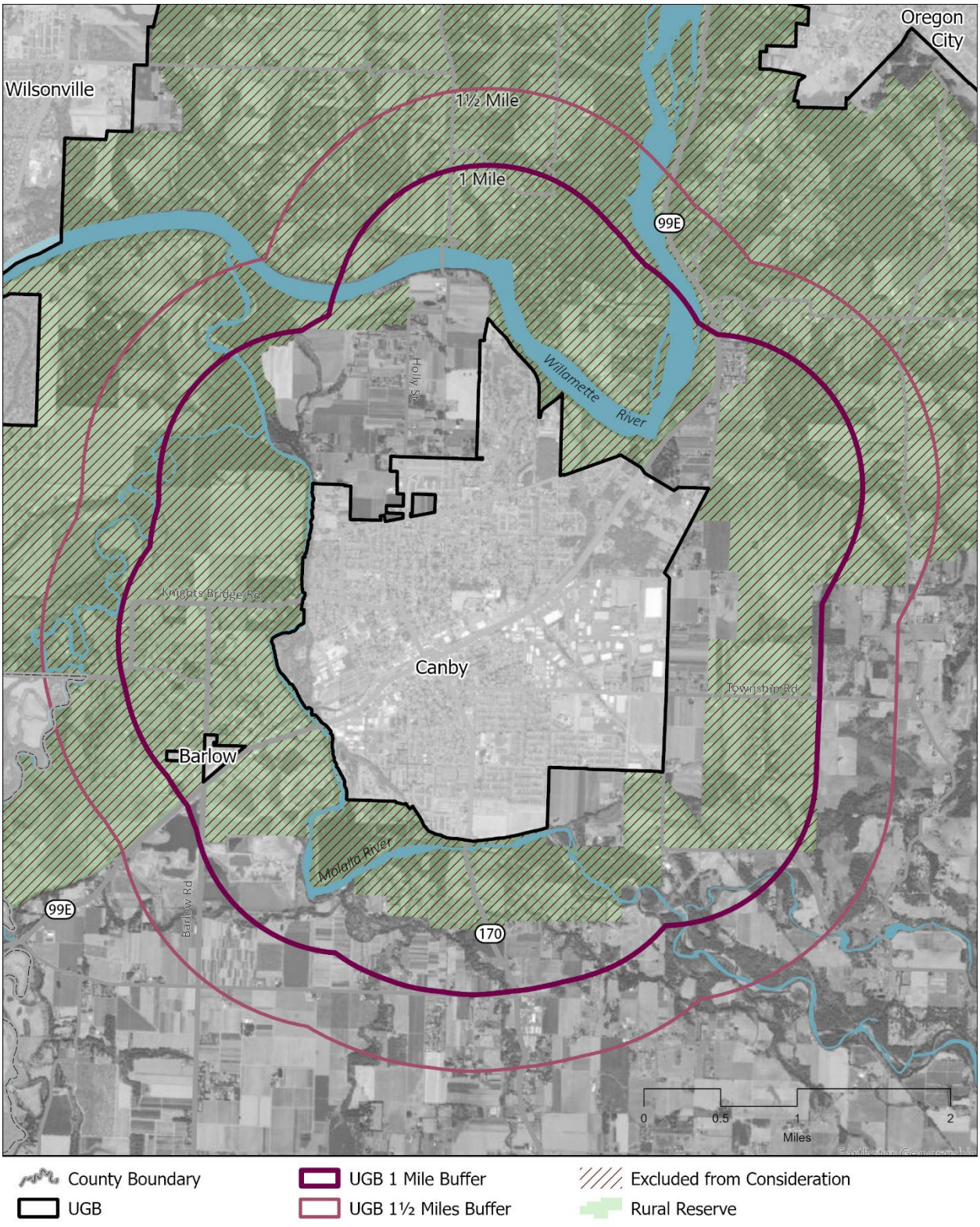
In accordance with OAR 660-024-0065(4)(a), lands that are impracticable to provide necessary public facilities or services to the land may be excluded from the Preliminary Study Area. OAR 660-024-0065(7) describes several reasons why cities may consider land impracticable to provide necessary public facilities or services to. Subsection (b) identifies land that is isolated from existing service networks such that it is impracticable to provide the necessary services.

The rural reserves that surround the existing Canby UGB cannot be included in any UGB amendments pursuant to OAR 660-027-0040(4), which states:

> *(4) Neither Metro nor a local government may amend a UGB to include land designated as rural reserves during the period described in section (2) or (3) of this rule, whichever is applicable.*

The City finds that due to the inability to include rural reserves in a UGB, these lands are isolated from existing services and are considered impracticable to provide services to. All lands that are designated as Rural Reserves are excluded from the Preliminary Study Area. The excluded Rural Reserve areas are illustrated in Figure 5.

Figure 5. Exclusion of Rural Reserves



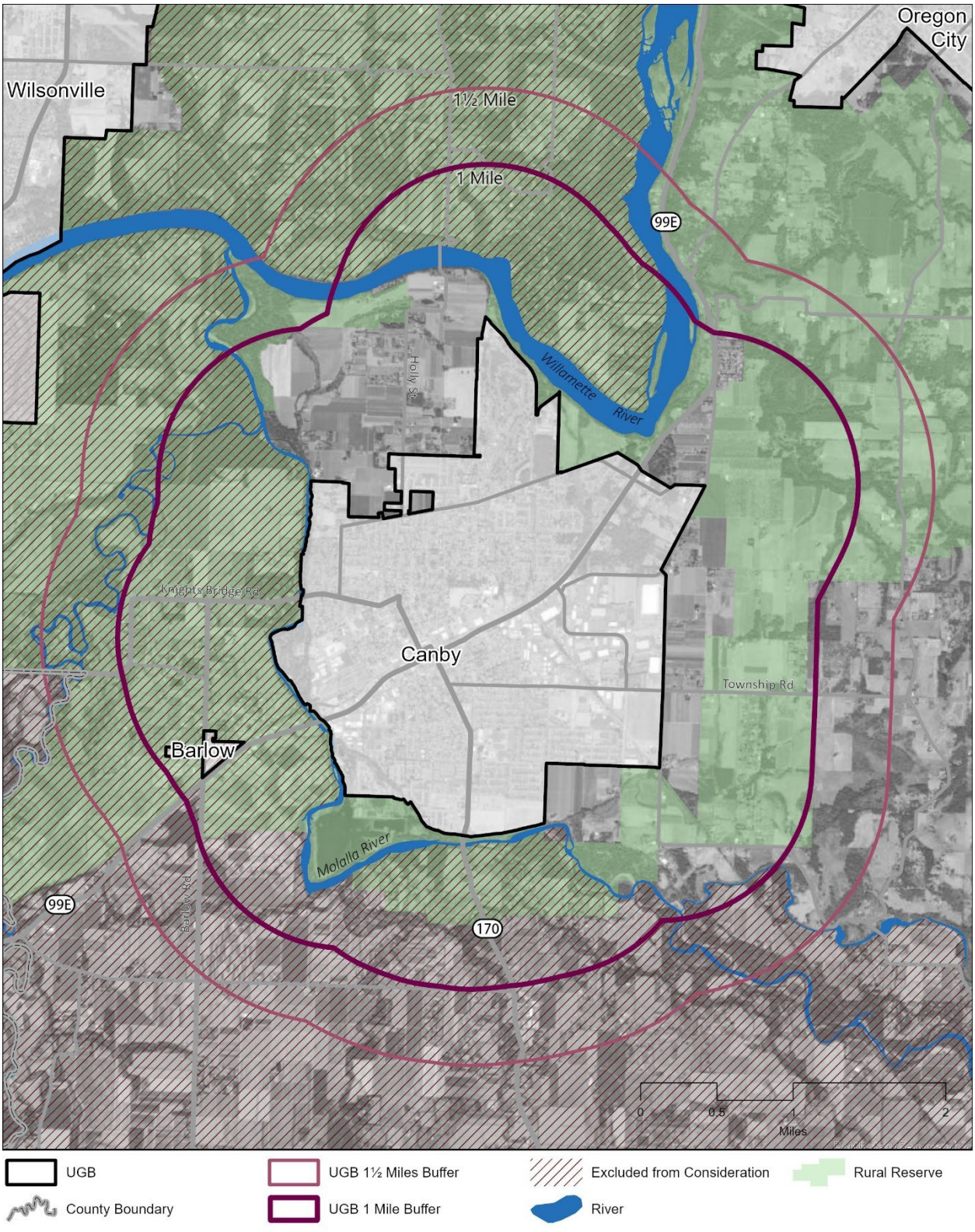
Exclusion of Major Rivers: Impracticable to Provide Services – Impediments to Service

Land in the Preliminary Study Area that is across the Willamette or Molalla rivers from the current City and UGB are excluded due to the areas being impracticable to provide with necessary public facilities. The exclusion of these lands from the Preliminary Study Area is allowed under OAR 660-024-0065(7)(b & c) due to these areas being isolated from existing service networks by "physical impediments" to service provision.

Major rivers or other water bodies that would require a new bridge crossing to serve planned urban development are included as an example of "impediments to service provision" in OAR 660-024-0065(7)(c). The City's determination to remove these lands from the Preliminary Study Area is based on the likely cost of facilities and services that would be necessary to serve the areas across the two rivers.

All lands that are across the Willamette River and the Molalla River from the existing UGB are excluded from the Preliminary Study Area. The excluded areas are illustrated in Figure 6. Overlap exists between the land across the two rivers from the existing UGB, and lands excluded to the Rural Reserve designation.

Figure 6. Exclusion of Major Rivers



Exclusion of Madrona Road Area: Impracticable To Provide Services – Impediments To Service – Amount Of Development And Cost Of Facilities And Services

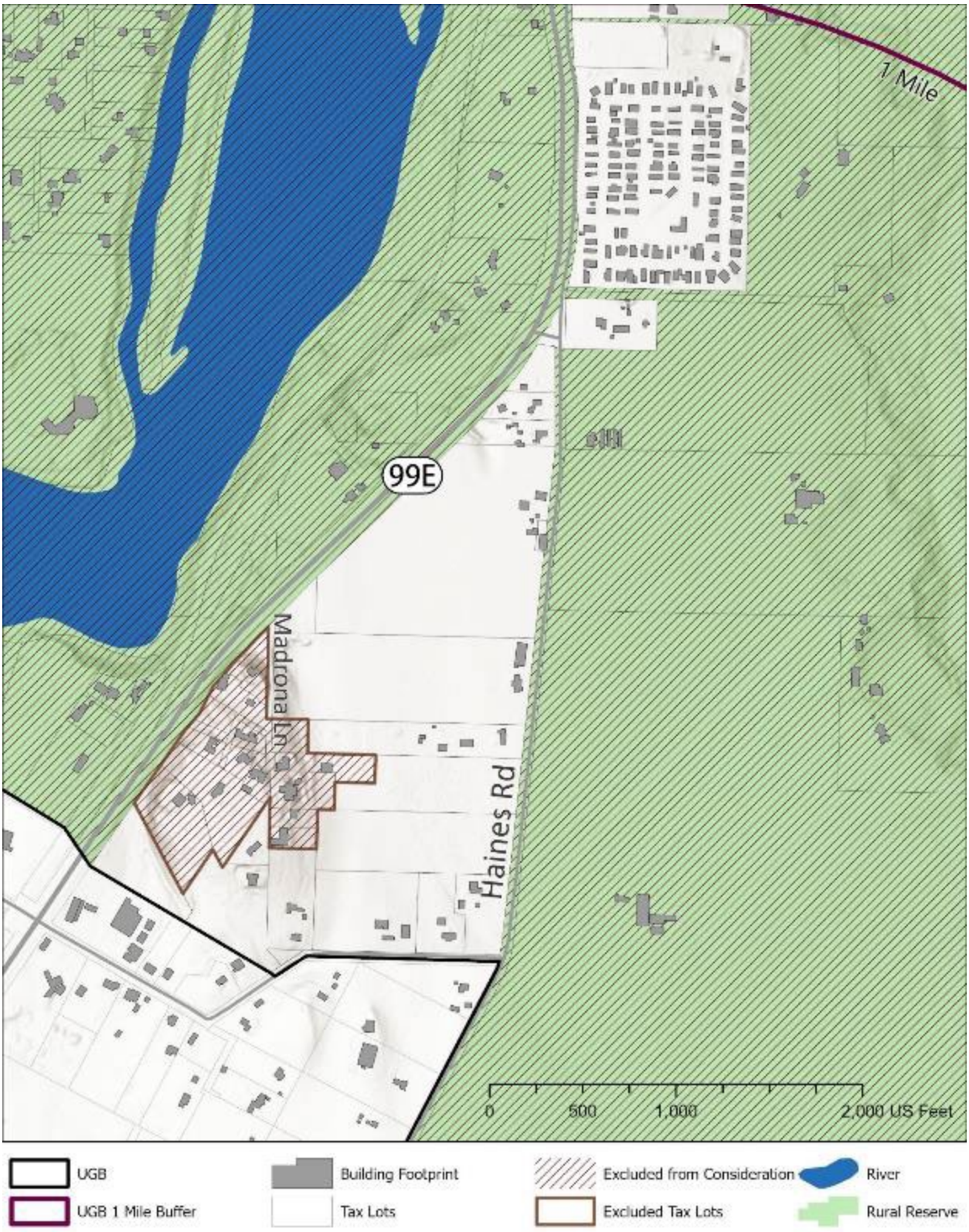
The City may exclude land from the Preliminary Study Area based on an evaluation of the likely amount of development that could occur on the land within the planning period (OAR 660-024-0065(7)(b)(A)) and the likely cost of facilities and services (OAR 660-024-0065(7)(b)(B)). The following tax lots north of the current Canby UGB and east of Highway 99-E that abut Madrona Lane are excluded from the Preliminary Study Area:

31E26: 1401, 1501, 1502, 1601, and 1603
31E27DA: 100, and 102
31E27AD: 300, 400, 500, 501, 600, 700, 800, and 900

The City of Canby City Engineer of Record, Curt J. McLeod, PE, from CURRAN-McLEOD, INC. found the tax lots to be impracticable to serve within the planning period due to extremely high construction costs to extend infrastructure to the area due to rock excavation, steep slopes, many required easements, and disruption to landscaping. In addition, the area would yield few additional development sites due to the existing development pattern and unbuildable steep slopes. The infrastructure cost per new lot would exceed the value of the lots. The full letter from Curt McLeod, PE is included with this memo as Appendix B.

The excluded area described in this section is demonstrated in Figure 7.

Figure 7. Exclusion of Madrona Road Area



Exclusion of Special Flood Hazard Areas: Significant Development Hazards – Flooding

Lands may be excluded from the Preliminary Study Area if the City determines that there are significant development hazards due to a risk of flooding including inundation during storm surges. There are several areas that meet the definition in OAR 660-024-0065(4)(b)(B) that are excluded because they are within the SFHA identified on the FIRM. The City excluded the areas within the SFHA on the following tax lots:

> 31E29A: 200, 300, 401, and 500 located along the Molalla River to the west of the City.
> 31E29D: 300, and 200 located along the Molalla River to the west of the City.
> 41E03: 2400, 2500, 2600, 2601, and 2602 located along the Molalla River to the south-east of the City.

The excluded areas on these properties are illustrated in Figures 8 and 9. Only the areas subject to identified SFHA are excluded from these properties.

The City decided not to exclude all areas within the Preliminary Study Area that contain identified SFHA land at this stage of the process in order to keep these lands in the Study Area for further analysis.

Exclusion of Steep Slopes: Impracticable to provides necessary public facilities or services

The City may exclude land from the Preliminary Study Area because it is impracticable to provide necessary facilities or services to the land within the planning period based on an evaluation of the likely amount of development that could occur on the land within the planning period (OAR 660-024-0065(7)(b)(A)). Areas with steep slopes are excluded for this reason.

The same areas described above as excluded due to presence of SFHA land contain areas of land that have slopes of 25 percent or greater. These areas do not meet the definition of buildable land as they are over 25 percent slope. While this term is only applied to residential land in this context, this heavily sloped land, if kept in the Preliminary Study Area, would not be considered suitable for industrial uses because it contains slopes of more than 10 percent.

Based on the likely amount of development that could occur during the planning period, the City excluded the areas with steep slopes on the following tax lots:

> 31E29A: 200, 300, 401, and 500 located along the Molalla River to the west of the City.
> 31E29D: 300, 200, and 210 located along the Molalla River to the west of the City.
> 41E03: 2400, 2500, 2600, 2601, and 2602 located along the Molalla River to the south-east of the City.

The excluded areas on these properties are illustrated in Figures 8 and 9. Only the areas with slopes of more than 25 percent are being excluded from these properties.

The City decided not to exclude all areas within the Preliminary Study Area that contain slopes of 25 percent at this stage of the process in order to keep these lands in the Study Area for further analysis.

Figure 8. Exclusion of SFHAs and Steep Slopes West of the Existing UGB

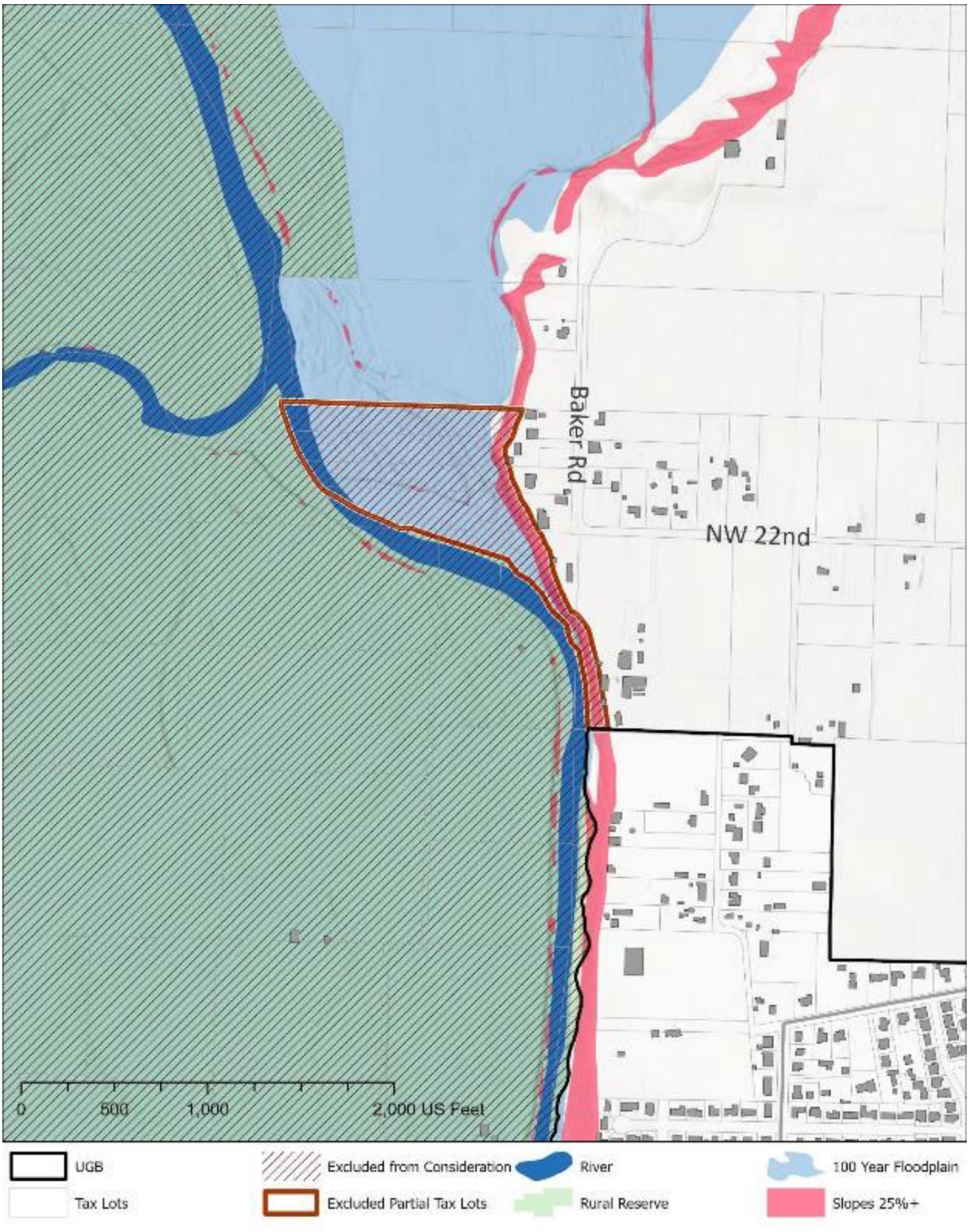
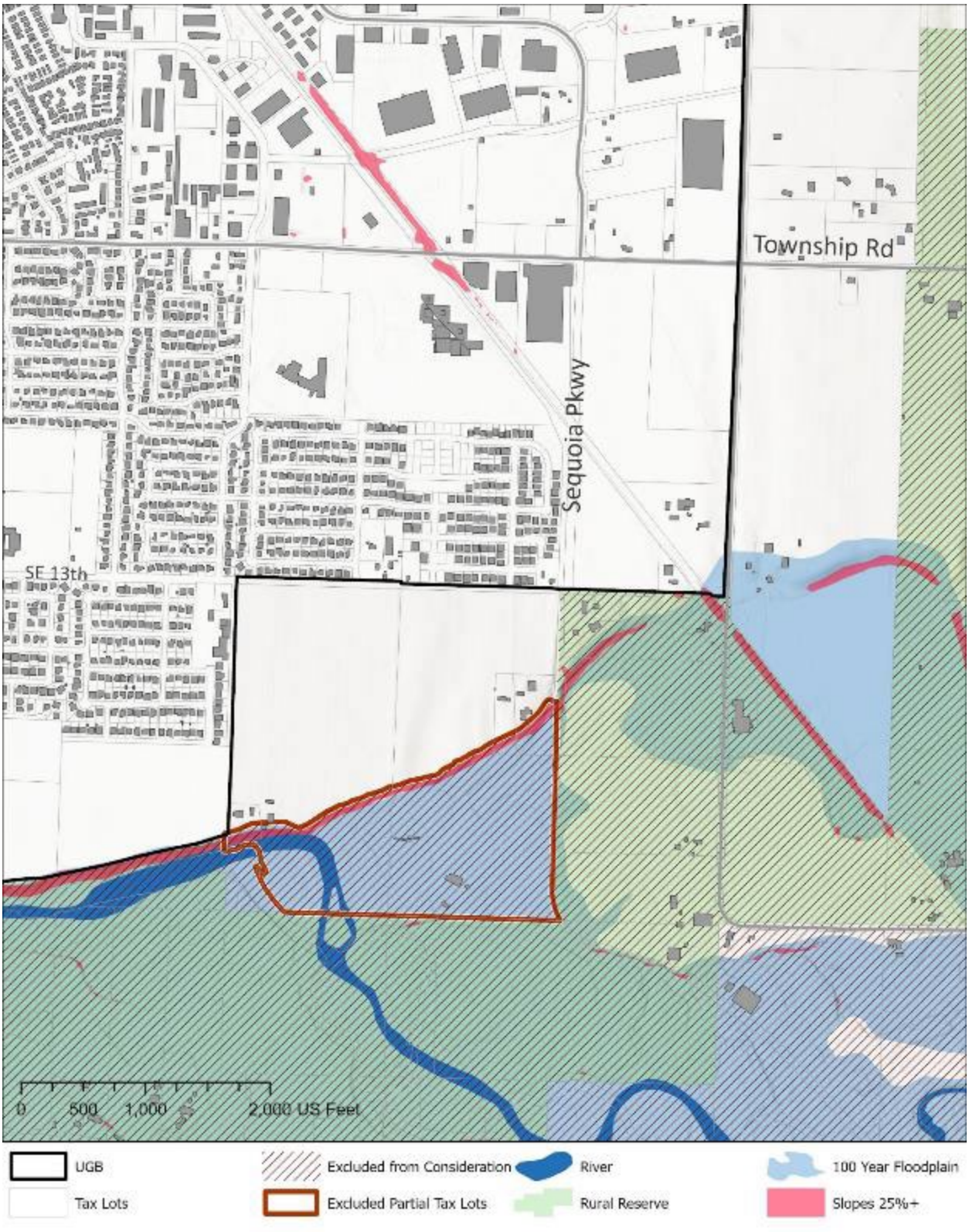


Figure 9. Exclusion of SFHAs and Steep Slopes Southeast of the Existing UGB.



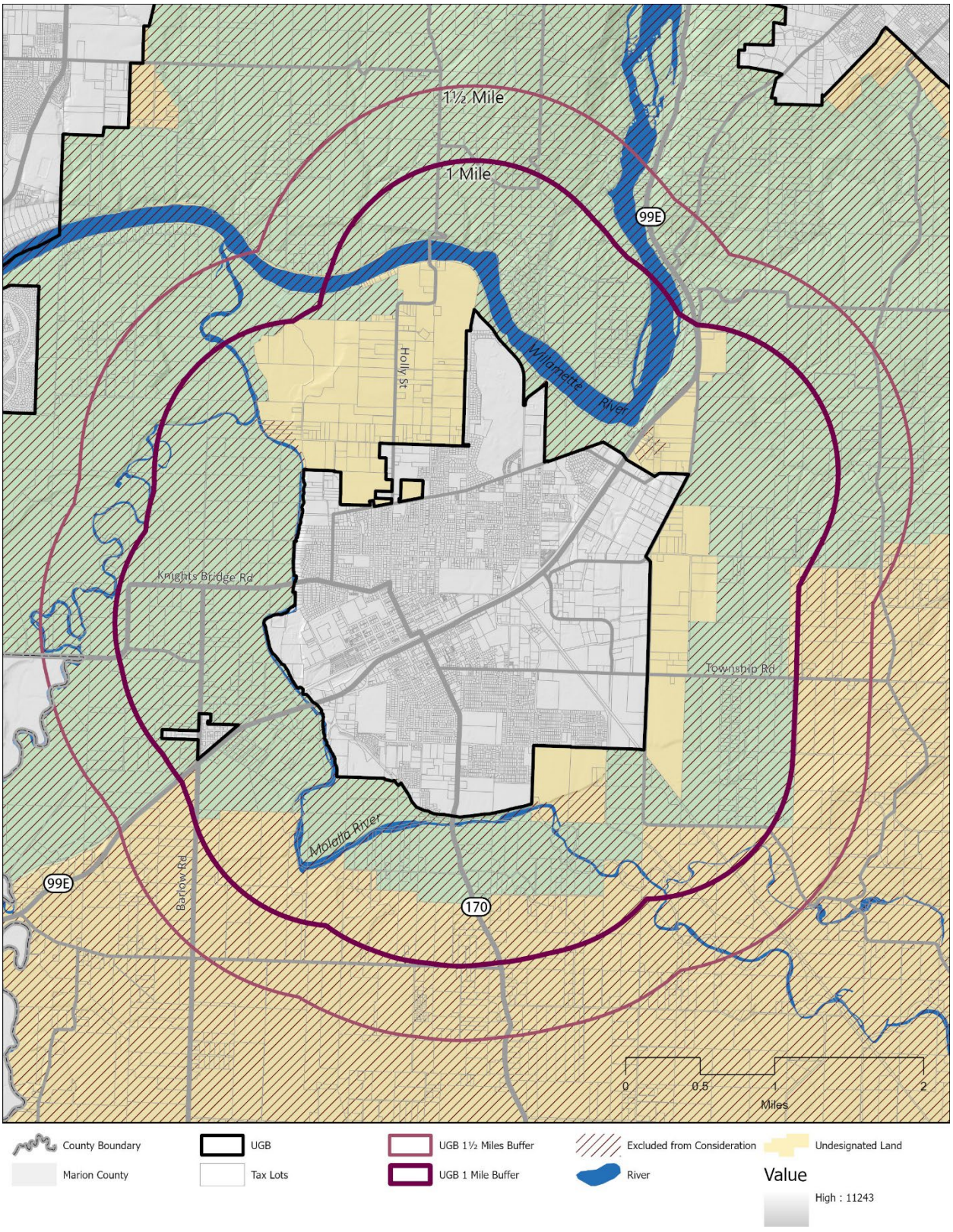
Exclusion Areas Conclusion

In summary, lands from the Preliminary Study Area were excluded using the provisions allowed in OAR 660-024-0065. All excluded lands are shown in the above figures. Upon exclusion of these lands, several locations that are inside the one-and-a-half-mile Preliminary Study Area buffer are now physically separated from the existing UGB. Lands that are physically separated through the above exclusions are no longer considered for inclusion into the UGB as there would not be a contiguous boundary. Providing necessary services to non-contiguous areas within the Study Area is impracticable.

Other areas of land within the Preliminary Study Area, specifically those that are within the SFHA, or contiguous areas of at least 5 acres where 75 percent or more of the land has a slope of 25 percent or greater, remain in the Study Area for further analysis. There are no further adjustments or exclusions to the Study Area.

All excluded areas from consideration are illustrated in Figure 10.

Figure 10. Land Excluded from the Preliminary Study Area



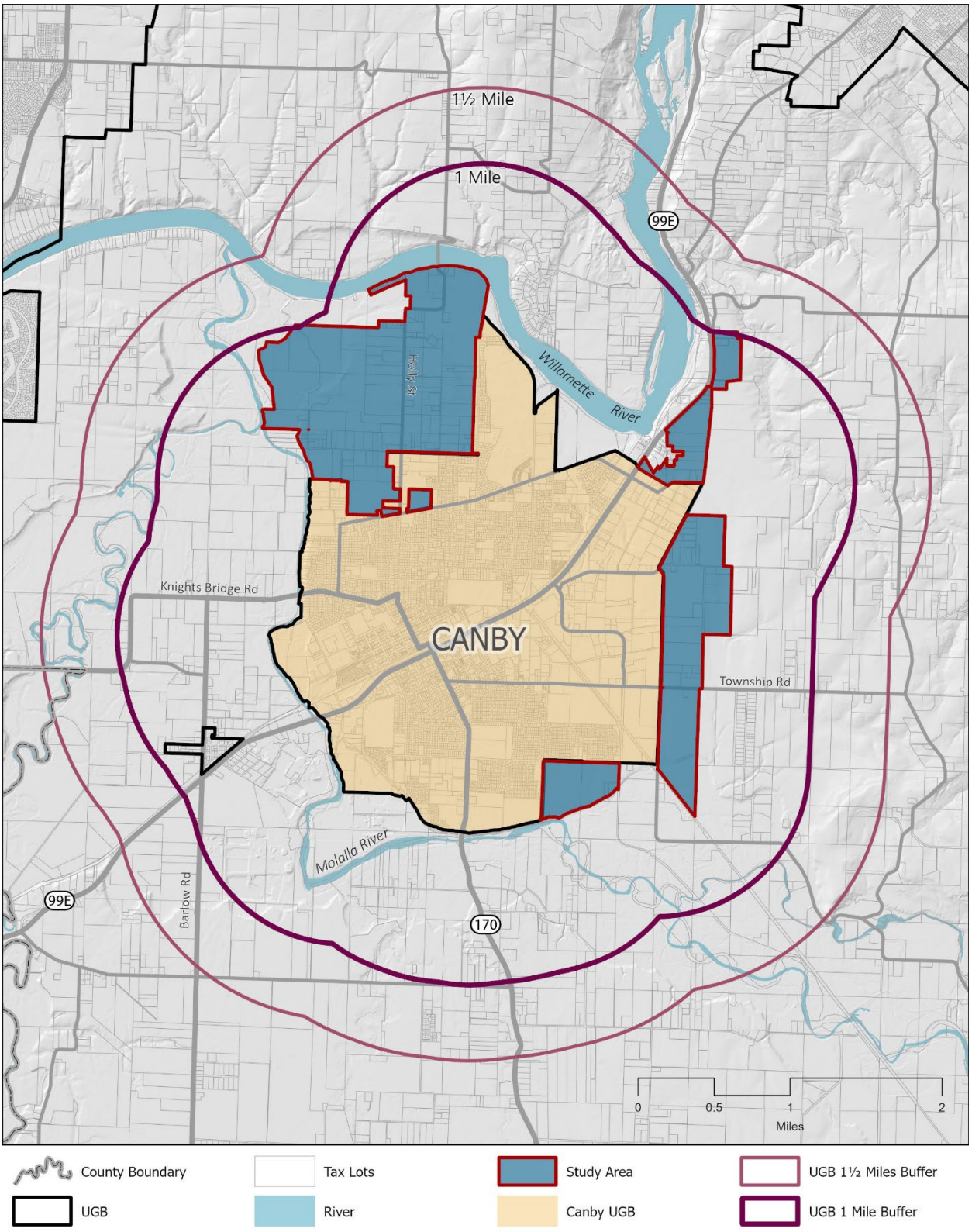
Create Study Area

The land need after applying efficiency measures, as determined in Chapter 2, is 538.0 acres. Total acreage in the final Study Area is 1,555.4 acres after all exclusions. OAR 660-024-0065(5) requires that the Study Area contains at least twice the amount of land needed for the deficiency determined in OAR 660-024-0050(4) and described in Chapter 2. The amount of land in the Study Area meets this threshold.

Figure 12 illustrates the Study Area, which includes 1,555.4 gross acres on 201 tax lots. The Study Area consists only of undesignated lands that currently have Clackamas County zoning designations of Rural Residential Farm Forest 5-Acre (RRFF5) or Exclusive Farm Use (EFU).

The City finds that the Study Area shown in Figure 11 complies with the requirements of OAR 660-024-0065 by establishing a Study Area to evaluate land for inclusion to a UGB.

Figure 11. Canby UGB Expansion Study Area



4. Analyze Study Area

The process for evaluating and prioritizing land for inclusion in the UGB is described in OAR-660-024-0067(2). The highest priority land for inclusion is analyzed for suitability to meet the deficiency for both the employment and residential land need. If there is no excess of suitable first priority land, then all of those lands are established as areas for inclusion into the UGB. If a deficiency of land still exists after the highest priority suitable lands are established for inclusion, the next highest priority of land is analyzed for suitability. If there is an excess of suitable land in a particular priority category, the City will choose which lands in that priority to include into the UGB by applying the boundary location factors of Goal 14. The Goal 14 boundary location factors are used to compare alternative locations and determine which of the excess lands in a particular priority category are most suitable for inclusion into the UGB.

Establish Subareas

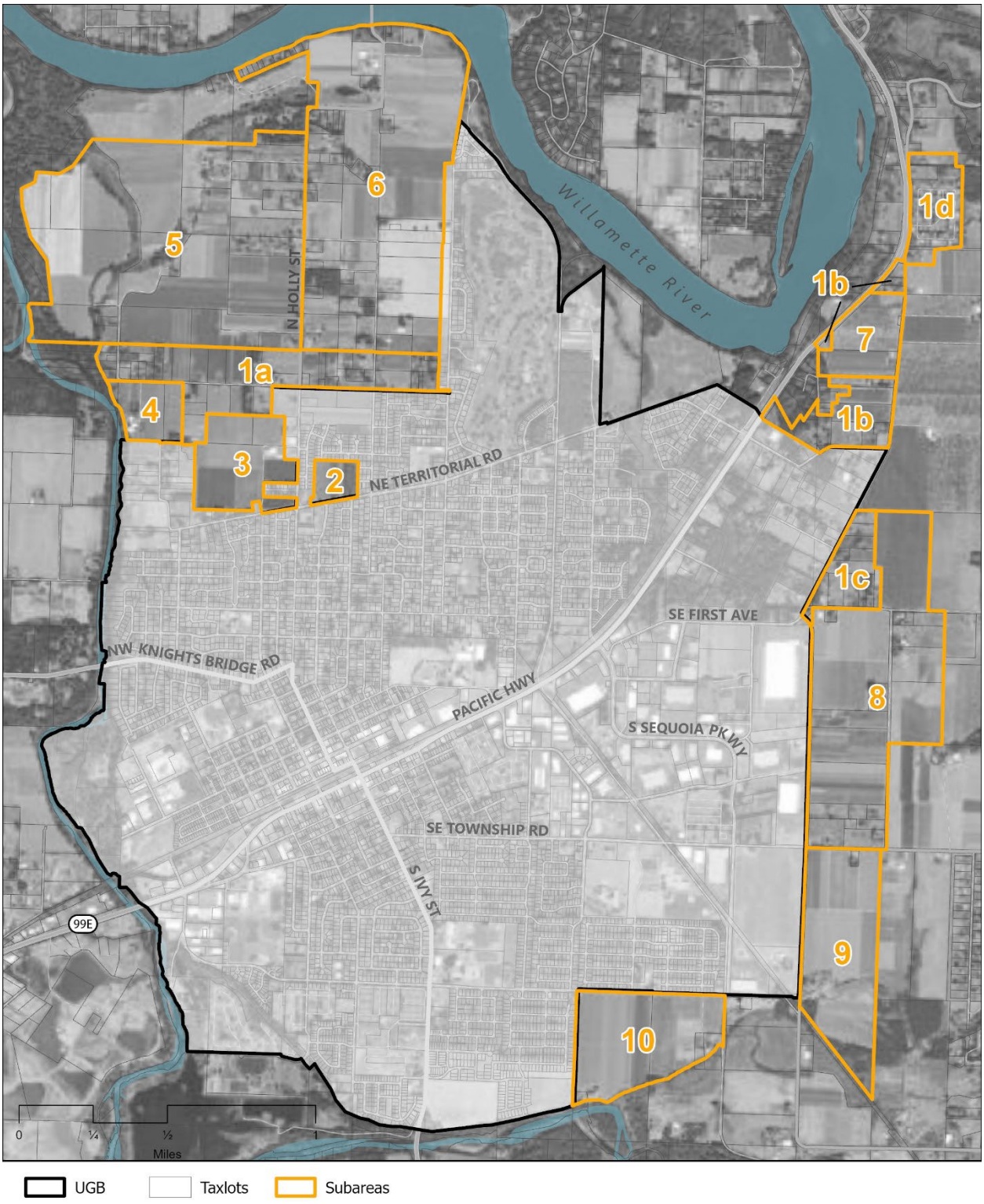
This section provides details about soils and other boundary related considerations to describe the basis for establishing subareas within the Study Area. The boundaries of the subareas are determined by the existing edges of undesignated lands, exception lands, tax lots, and soil types. For non-exception lands, soil types and classifications are considered so that areas of predominantly higher capability soils are not grouped together with areas of soils predominantly of lower capability. The subareas do not contain a mix of exception land and resource lands, and do not include any land designated as rural reserves.

Figure 12 shows the subareas within the Study Area. The subareas and their size in acres are demonstrated in Table 8.

Table 8. Subarea Tax Lots and Acres

Subarea	Number of Tax Lots	Total Acres (Gross)
1a	49	115.9
1b	16	50.0
1c	14	34.3
1d	7	39.0
2	1	13.0
3	3	60.8
4	3	27.8
5	26	392.5
6	60	345.8
7	3	40.5
8	19	228.0
9	2	112.0
10	5	95.9
Total	208	1,555.4

Figure 12. Study Area Subareas



Suitability Criteria

Suitability criteria are defined in OAR 660-024-0067(5)(a-g):

- Parcelization: land consisting primarily of parcels 2-acres or less in size
- Existing development patterns: land that cannot be reasonably redeveloped or infilled within the planning period due to the location of existing structures and infrastructure
- Land that could have been excluded from the Preliminary Study Area, but was included pending more detailed analysis
- Land subject to Goal 5 protections
- For industrial uses, land that is over 10 percent slope or is smaller than 5 acres
- For industrial uses, land that cannot be improved to provide a specific site characteristic
- Land subject to a conservation easement
- Land committed to a use, such as public park, church, school, cemetery, or airport

First Priority for Inclusion (OAR 660-024-0067(2)(a)

The First Priority includes urban reserves, exception lands, and non-resource lands. Canby does not have any acknowledged urban reserves. The Study Area contains areas of exception lands and non-resource lands which are described as subareas 1a, 1b, 1c, and 1d in Figure 13.

There is a gross total of 239.2 acres of exception land in the Study Area, all with existing County zoning designation of Rural Residential Farm Forest 5-Acre (RRFF5). The exception lands are grouped into subareas determined primarily by their county zoning designations. Consideration was also given to existing tax lot boundaries, existing rights-of-way, and soil types when determining the separate exception land subareas.

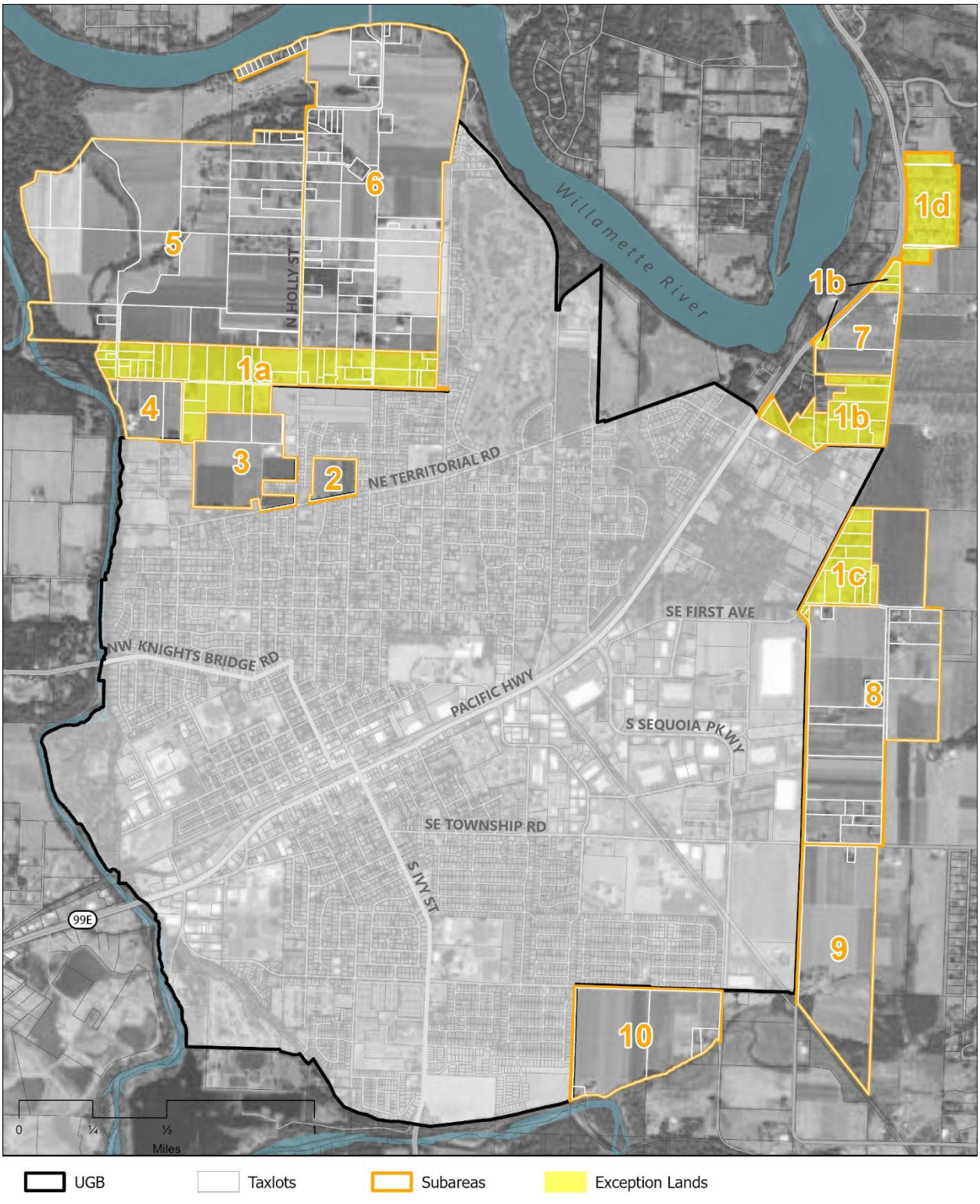
Other exception lands that are within the one mile, and one and one-half mile buffers were previously excluded as described in Chapter 3, using the exclusion criteria of OAR 660-024-0065.

In accordance with OAR 660-024-0067(2)(a), these land areas are the highest priority for inclusion into the UGB. With respect to the suitability criteria of OAR 660-024-0067(5-6) the City determined how much of that land is suitable to meet the need deficiency.

First Priority Suitability Criteria

As established, the exception lands in the Study Area are the highest priority for inclusion due to their non-resource Clackamas County zoning designation. Tables 9, 10, and 11 demonstrate suitability for inclusion to meet the land need, which are separated into commercial, industrial, and residential uses. The columns in each table are based on suitability criteria in OAR 660-024-0067(5).

Figure 13. Exception Land and Subareas



Acres that are considered unsuitable include areas that could have been previously excluded from the Study Area. These acres are unsuitable as lands subject to natural hazards (flooding) or lands that are contiguous of at least 5 acres where 75 percent or more of the land has a slope of 25 percent or greater. These unsuitable lands are grouped together in the "Exclusion Acres" column in the tables and are subtracted from the amount of suitable lands in a given subarea.

Wetlands within the Study Area are also unsuitable based on Canby Development Code Chapter 16.140. The Willamette River Greenway, and streams with regulatory buffers are all unsuitable.

Some overlap exists between unsuitable lands that qualify for exclusion, and unsuitable lands that contain Goal 5 resources. The analysis makes note of these overlapping unsuitable areas and does not count them twice in the tables. There are no historic resources in subareas 1a, 1b, 1c, and 1d.

None of the lands in the Study Area contain conservation easements or committed uses, as described in OAR 660-024-0067(5)(f-g), therefore they are not included in any of the tables.

Table 9 shows that there are 239.1 acres of exception land in the Study Area, of which 200.0 acres are considered suitable to meet the less than an acre of employment land need for commercial uses, after applying the suitability criteria of OAR 660-024-0067(5)(f-g). Subarea 1d is unsuitable for commercial use due to the existing development pattern. The land cannot be reasonably redeveloped or infilled within the planning period due to the existing manufactured home park, cemetery, and Goal 5 resource (historic structure).

Table 9. First Priority Lands Suitability – Commercial

Subarea	Total Acres	# of Tax Lots	# of Tax Lots ≤ 2 acres	Primarily 2 Acres or Less	Exclusion Acres	Goal 5 Acres	Suitable Acres
1a	115.9	49	24	No	0.0	0.0	115.9
1b	50.0	16	7	No	0.0	0.2	49.8
1c	34.3	14	7	No	0.0	0.0	34.3
1d	39.0	14	3	No	39.0	2.9	0.0
Total	239.1	79	38	-	2.9	2.9	200.0

Suitability criteria for industrial uses for employment land need based on the large amount of industrial land need determined in the EOA is shown below in Table 10.

Table 10. First Priority Lands Suitability – Industrial

Subarea	Total Acres	Acres of Tax Lots <5 Acres	Exclusion Acres	Goal 5 Acres	10% Slope	Suitable Acres
1a	115.9	103.2	0.0	0.0	0.4	12.6
1b	50.0	26.1	0.0	0.1	7.6	22.8
1c	34.3	31.5	0.0	0.0	0.0	2.7
1d	39.0	11.4	39.0	2.9	3.5	0.0
Total	239.1	172.2	39.0	3.0	11.5	38.1

Of the 239.1 acres of exception land in the Study Area, 38.1 acres are suitable for industrial employment uses after applying the suitability criteria of OAR 660-024-0067(5)(d). Much of this exception land is parcelized, more than 170 acres being made up of parcels of 5 acres or less. For this reason, the City determined that the exception land in subareas 1a, 1b, and 1c are not well-suited for heavy industrial uses, but may be suitable for a business park or other lighter

industrial uses. Subarea 1d is unsuitable for any industrial use due to the existing manufactured home park, cemetery, and Goal 5 resource (historic structure).

Table 11 shows that exception land in the Study Area has sufficient capacity to meet the residential land need and that the entire residential need can be accommodated in Subarea 1a.

Table 11. First Priority Lands Capacity – Residential

Subarea	Total Acres (Gross)	Total Lots	Lots >2 Acres	Capacity for New Housing – Units	% of Land Need Available in Subarea
1a	115.8	49	25	693	110%
1b	49.9	16	9	328	52%
1c	34.3	14	7	163	26%
1d	39.0	7	4	0	0%
Total	200.0	86	45	1,184	-----

With a land need of 538.0 acres (73.1 acres/614 new residential units, 25.7 acres parks, 439.2 acres employment), the maximum 200.0 acres of exception land are not sufficient to accommodate the entire land need. Furthermore, the exception lands are not suitable for industrial development and therefore only accommodate 98.8 acres of the land need. The analysis proceeds to the next highest priority category to determine suitability and select sufficient land in that priority to satisfy the remaining acres of land need.

Second Priority for Inclusion (OAR 660-024-0067(2)(b)

Second Priority for inclusion into the UGB are marginal lands as determined by OAR 660-024-0067(2)(b). Marginal land only applies in Lane and Washington counties. Canby is in Clackamas County and thus does not have marginal land.

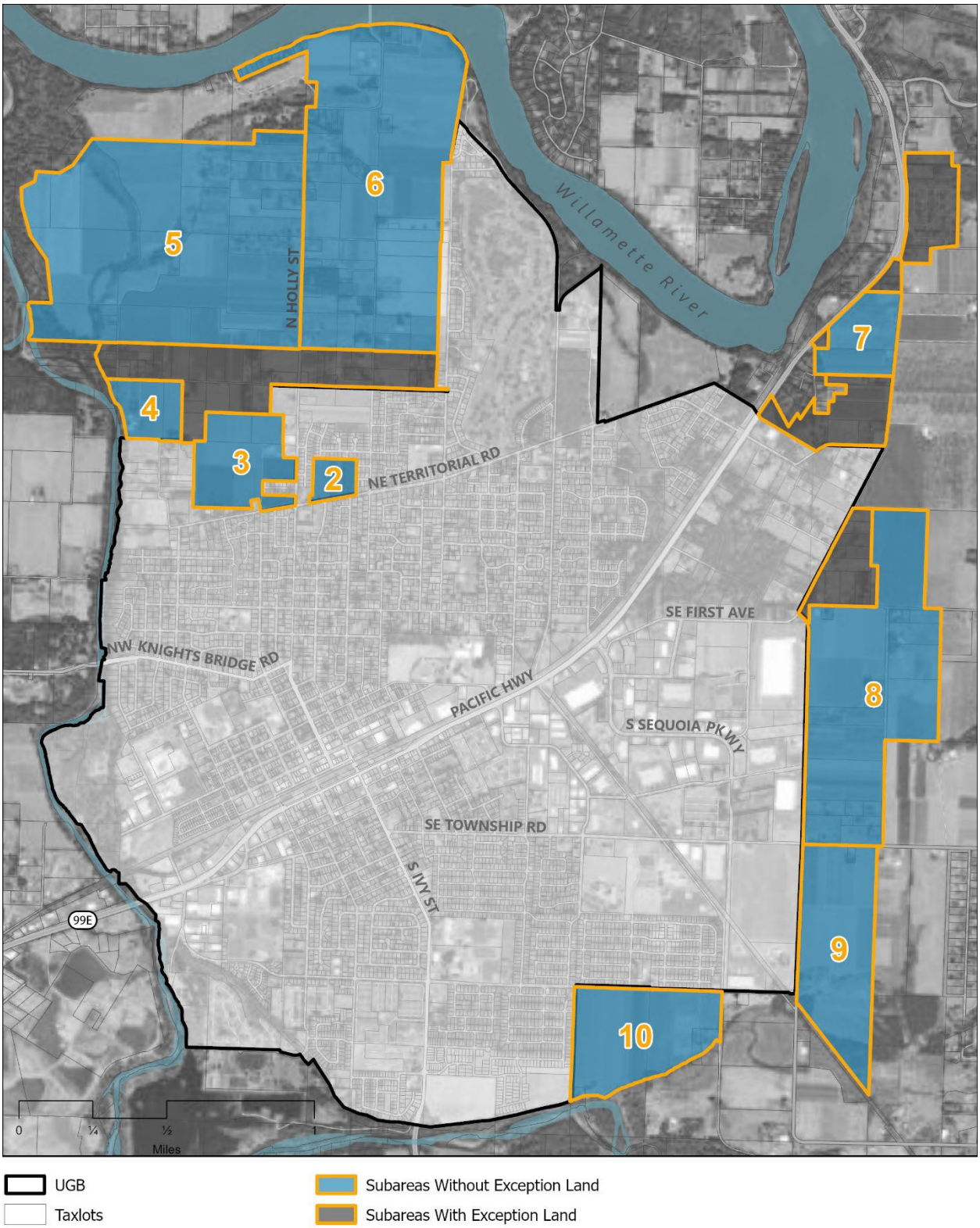
The City finds that there is no second priority land within the Study Area to meet the identified land need and proceeded to the next highest priority category to determine and select for UGB inclusion.

Third Priority for Inclusion (OAR 660-024-0067(2)(c)

Third Priority for inclusion into the UGB are agriculture or forest lands that are not predominantly high-value farmland (as defined in ORS 195.300 and ORS 215.710) or lands that do not consist predominantly of prime or unique soils (as determined by the United States Department of Agriculture Natural Resources Conservation Service).

Subareas 2-10, illustrated in Figure 14: Subareas Without Exception Land, are lands within the Study Area that are evaluated for the presence of third priority lands. Nearly all of lands surrounding the existing Canby UGB are considered high-value farmland as defined by ORS 215.710, which includes prime or unique farmland, consistent with the definitions from the United States Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS). Therefore, all of the subareas include land that is classified as high-value farmland by one or more of the definitions in ORS 195.300(10).

Figure 14. Subareas without Exception Land



An overlap of lands considered high-value farmland based on varying definitions is demonstrated in Figure 15. These areas are primarily made up of irrigated or not irrigated soils that are classified as: prime, unique, Class I, or Class II (ORS 215.710(1)(a & b)).

Third priority analysis is focused on the non-exception lands in subareas 2-10. The City used the agricultural land capability classification system to conduct the analysis per state rules.

OAR 660-024-0067(4)(a) allows for areas of land not larger than 100 acres to be grouped together and studied as a single unit of land. In accordance with this rule, subareas 2, 3, 4, and 7 that are not larger than 100 acres are grouped together for the purposes of categorizing and evaluating land pursuant to the third and fourth priority categories.

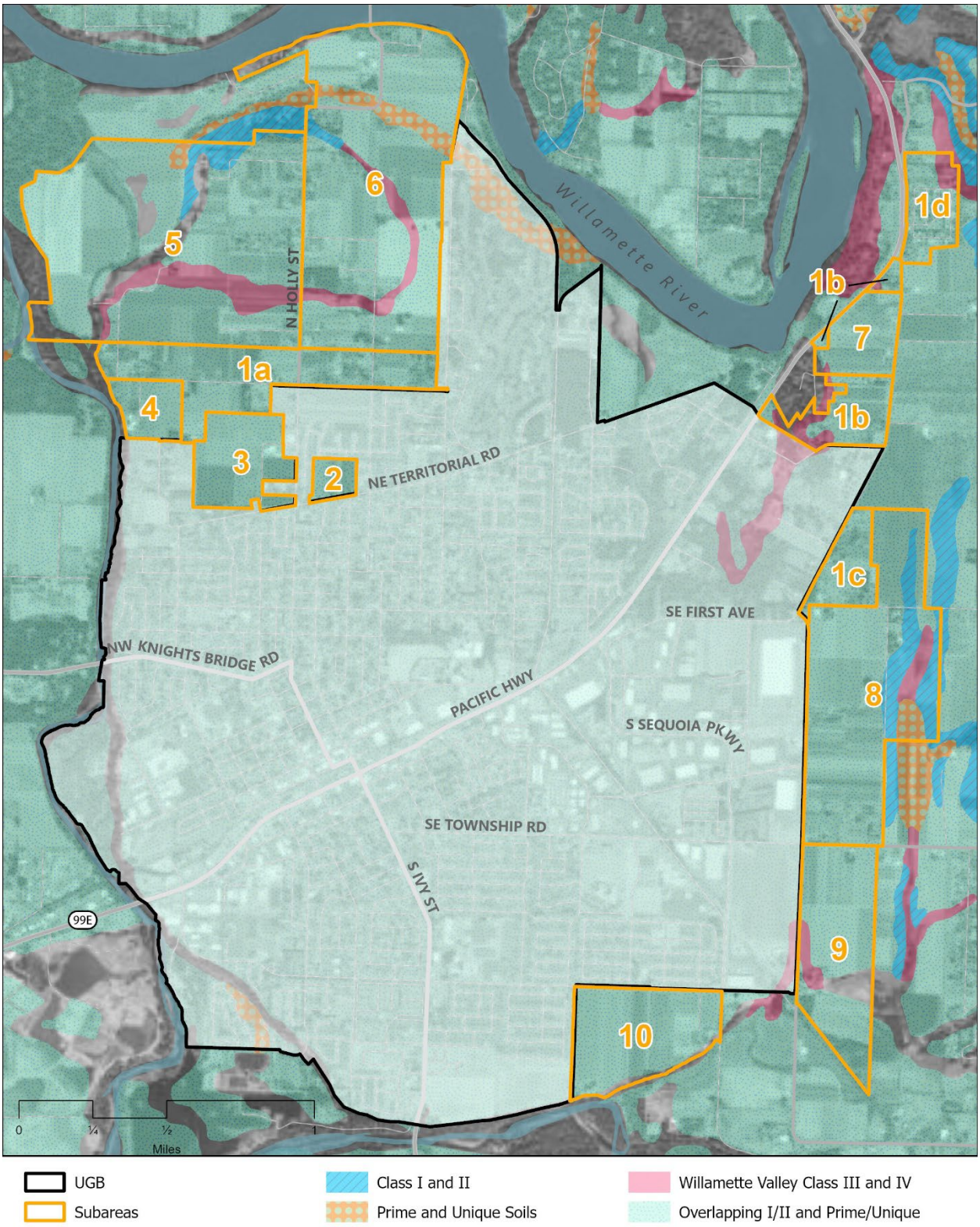
OAR 660-024-0067(4)(b) allows for areas of land larger than 100 acres that are similarly situated to be grouped together for analysis. Most of the subareas over 100 acres in size have portions of soils of higher and lower capability grouped together. Separating the lands into smaller subareas based on agricultural land capability classification would not change the prioritization for inclusion into the UGB because the characteristics of the subareas still meet the definition of containing predominantly high-value farmland as defined in ORS 217.715. Therefore, subareas that group higher and lower capability resource lands can be grouped together and remain consistent with the intent of prioritization rule in OAR 660-024-0067(2). Table 12 demonstrates that each subarea is predominantly high-value farmland, based on the amount of prime or unique soils (acres) for each of the remaining subarea.

Table 12. Prime or Unique Soils

Subarea*	Total Acres in Subarea	Prime or Unique Soils (Acres) in Subarea	Percent Acres with Prime or Unique Soils
2	13.0	13.0	100%
3	60.8	60.8	100%
4	27.8	27.5	99%
5	392.5	308.4	79%
6	345.8	313.6	91%
7	40.5	39.1	97%
8	228.0	183.5	81%
9	112.0	96.7	86%
10	95.9	90.7	95%
Total	1,316.3	1,133.2	86%

*Exception land subareas not included

Figure 15. High-Value Farmland and Subareas



The subareas have considerable overlap between the various definitions that designate land as high-value farmland. Table 13 identifies the amount of high-value farmland in each subarea with each definition separated.

Table 13. High-Value Farmland by Varying Definitions

Subarea*	High Value Farmland Areas				Non High Value Farmland Acres	Total Acres	Percent High Value Farmland
	Class I & II Soils	Willamette Soils Class III & IV	Prime or Unique (not in soil subclass)	Viticultural Area (not in soil subclass/ prime or unique			
2	13.0	0.0	0.0	0.0	0.0	13.0	100%
3	60.8	0.0	0.0	0.0	0.0	60.8	100%
4	27.5	0.0	0.0	0.0	0.4	27.8	99%
5	319.7	33.9	3.4	0.0	35.5	392.5	91%
6	299.5	22.0	17.7	0.0	6.5	345.8	98%
7	39.1	0.5	0.0	0.1	0.9	40.5	98%
8	211.8	8.7	7.4	0.0	0.0	228.0	100%
9	96.7	6.7	0.0	0.0	8.7	112.0	92%
10	90.7	0.0	0.0	0.0	5.1	95.9	95%
Total	1,158.8	71.7	28.6	0.1	57.0	1,316.3	96%

*Exception land subareas not included

Each of the subareas are predominantly high-value farmland for the purposes of determining third and fourth priority of land for inclusion in a UGB as outlined in OAR 660-024-0067(2).

The remaining non-exception land subareas were evaluated for third priority inclusion. Conclusions for each subarea are as follows:

Subarea 2 – Soils on the lands in this subarea are predominantly high-value, due to the status of "Prime farmland if irrigated", and Class I or II soils.

The City finds that Subarea 2 does not qualify as having predominantly third priority land.

Subarea 3 – Soils on the lands in this subarea are predominantly high-value, due to the status of "Prime farmland if irrigated", and Class I or II soils.

The City finds that Subarea 3 does not qualify as having predominantly third priority land.

Subarea 4 – Soils on the lands in this subarea are predominantly high-value, due to the status of "Prime farmland if irrigated", and Class I or II soils.

The City finds that Subarea 4 does not qualify as having predominantly third priority land.

Subarea 5 – Soils on the lands in this subarea are predominantly high-value, due to the status of "All areas are prime farmland", "Prime farmland if irrigated", Class I or II soils, or subclass III or IV of Latourell loam.

Approximately 35 acres of the 392.4-acre subarea are not considered high-value farmland. This non-high-value farmland is separated from the existing UGB and consists of an "island" within the SFHA boundary and a "band" of soil type that runs north to south roughly along the SFHA boundary of the subarea.

Pursuant to OAR 660-024-0067(4)(b), areas of land larger than 100 acres that are similarly situated and have similar soils may be grouped together provided soils of lower agricultural or forest capability may not be grouped with soils of higher capability in a manner inconsistent with

the intent of section (2) of this rule, which requires that higher capability resource lands shall be the last priority for inclusion in a UGB.

Because the "island" and "band" of non-high-value soil is isolated from other similar types of soils, it would not present a logical separate subarea and was grouped into the greater Subarea 5. The 35.5 acres of non-high-value farmland out of the 392.4-acre subarea does not meet the threshold to be considered not predominantly high-value farmland.

The City finds that Subarea 5 does not qualify as having predominantly third priority land.

Subarea 6 – Soils on the lands in this subarea are predominantly high-value, due to the status of "All areas are prime farmland", "Prime farmland if irrigated", Class I or II soils, or subclass III or IV of Latourell loam.

In this subarea, 6.5 acres of non-high-value farmland exist, located on the very north portion of the subarea that is abutting the Willamette River. Pursuant to OAR 660-024-0067(4)(b), areas of land larger than 100 acres that are similarly situated and have similar soils may be grouped together provided soils of lower agricultural or forest capability may not be grouped with soils of higher capability in a manner inconsistent with the intent of section (2) of this rule, which requires that higher capability resource lands shall be the last priority for inclusion in a UGB.

Because the area of non-high-value soil along the Willamette River is isolated from other similar types of soils, it would not present a logical separate subarea and was grouped into the greater Subarea 6. The 6.5 acres of non-high-value farmland out of the 345.8-acre subarea does not meet the threshold to be considered not predominantly high-value farmland.

The City finds that Subarea 6 does not qualify as having predominantly third priority land.

Subarea 7 – Soils on the lands in this subarea are predominantly high-value, due to the status of "All areas are prime farmland", Class I or II soils, or subclass III or IV of Latourell loam.

There are 0.9 acres of non-high-value farmland in this subarea, located to the east of East Madrona Lane in tax lot: 31E26 01300. Pursuant to OAR 660-024-0067(4)(a), areas of land not larger than 100 acres may be grouped together and studied as a single unit of land. The 0.9 acres of non-high-value farmland in the 40.5-acre subarea does not meet the threshold to be considered not predominantly high-value farmland.

The City finds that Subarea 7 does qualify as having predominantly third priority land.

Subarea 8 – Soils on the lands in this subarea are predominantly high-value, due to the status of "All areas are prime farmland", "Farmland of unique importance", Class I or II soils, or subclass III or IV of Dayton silt loam. Additional analysis conducted in September 2026 indicates a presence of "Humaquepts" characterized by very poorly drained, hydric soils that experience prolonged periods of standing surface water. This soil type makes up only 3.2% of the soils in Subarea 8 and does not impact the recommended UGB amendment. A map of nonirrigated soil capability classes is included as Appendix C.

The City finds that Subarea 8 does not qualify as having predominantly third priority land.

Subarea 9 – Soils on the lands in this subarea are high-value, due to the status of "All areas are prime farmland", Class I or II soils, or subclass III or IV of Latourell loam.

Approximately 9 acres of non-high-value resource lands exist in this subarea, located to the east of South Mulino Road in tax lot: 41E02 00600. Pursuant to OAR 660-024-0067(4)(b), areas of land larger than 100 acres that are similarly situated and have similar soils may be grouped together provided soils of lower agricultural or forest capability may not be grouped with soils of

higher capability in a manner inconsistent with the intent of section (2) of this rule, which requires that higher capability resource lands shall be the last priority for inclusion in a UGB.

The 8.7 acres of non-high-value farmland within the 112.0-acre subarea does not meet the threshold to be considered not predominantly high-value farmland. Subarea 9 was created with the lower capability soils intentionally included. The City finds that there is no practical way to create the subarea to separate the higher and lower capability soils based on the location of the lower capability soils in the subarea.

The City finds that Subarea 9 does not qualify as having predominantly third priority land.

Subarea 10 – Soils on the lands in this subarea are predominantly high-value due to the status of "All areas are prime farmland" or are Class I or II soils.

Approximately 5 acres of non-high-value farmland exist in this subarea, located to the south of Southeast 13th Avenue along the boundary of the subarea in tax lots: 41E03 02400, 41E03 02500, 41E03 02600, 41E03 02601, and 41E03 02602. Pursuant to OAR 660-024-0067(4)(a), areas of land not larger than 100 acres may be grouped together and studied as a single unit of land. The 5.1 acres of non-high-value farmland within the 95.9-acre subarea does not meet the threshold for farmland that is not predominantly high-value. Subarea 10 was created with the lower capability soils intentionally included. There is no practical way to create the subarea to separate the higher and lower capability soils.

The City finds that Subarea 10 does not qualify as having predominantly third priority land.

Third Priority Conclusion

The City finds that through using the agricultural land capability classification system, there are no subareas that are not predominantly high-value farmland that can be prioritized for inclusion in the UGB to meet the land need. No lands are included using the Third Priority criteria. The City analyzed the remaining land for Fourth Priority inclusion.

Fourth Priority for Inclusion (OAR 660-024-0067(2)(d)

As dictated by ORS 195.300 and 215.710, defining high-value farmland relies on a series of soil, crop, water, and topographic analyses. Included in the 12 definitions of high-value farmland in state statutes, high-value farmland is defined as areas predominantly composed of soils classified as Class I or Class II by NRCS. Class I and Class II soils are high-value soils because they are resilient to damage, easy to manage, and have few limitations for field crops. Pursuant to OAR 660-024-0067(4)(d), predominantly means more than 50 percent of the land being evaluated. Based on these definitions, Canby's UGB Study Area is predominantly composed of Class I or Class II soils.

The Study Area is evaluated against the remaining sections of ORS 195.300 and 215.710. Land located in EFU zones within irrigation districts or water use permit holdings, the prevalence of wine grape crops, and land containing named high-value soils or specific elevations, slopes, and aspects within the Willamette Valley viticultural area are determined as high-value farmland.

Table 12 demonstrates acreage high-value Prime or Unique soils separated. Table 13 shows the different categories of high-value farmland that make up each remaining subarea. As determined, most of the remaining lands have Prime and/or Unique soils overlapping with the other definitions of high-value farmland. The presence of Prime or Unique soils are considered in the determination of farmland value; however, the predominance of Class I or Class II soils is enough to consider the entire Study Area to be predominantly high-value farmland.

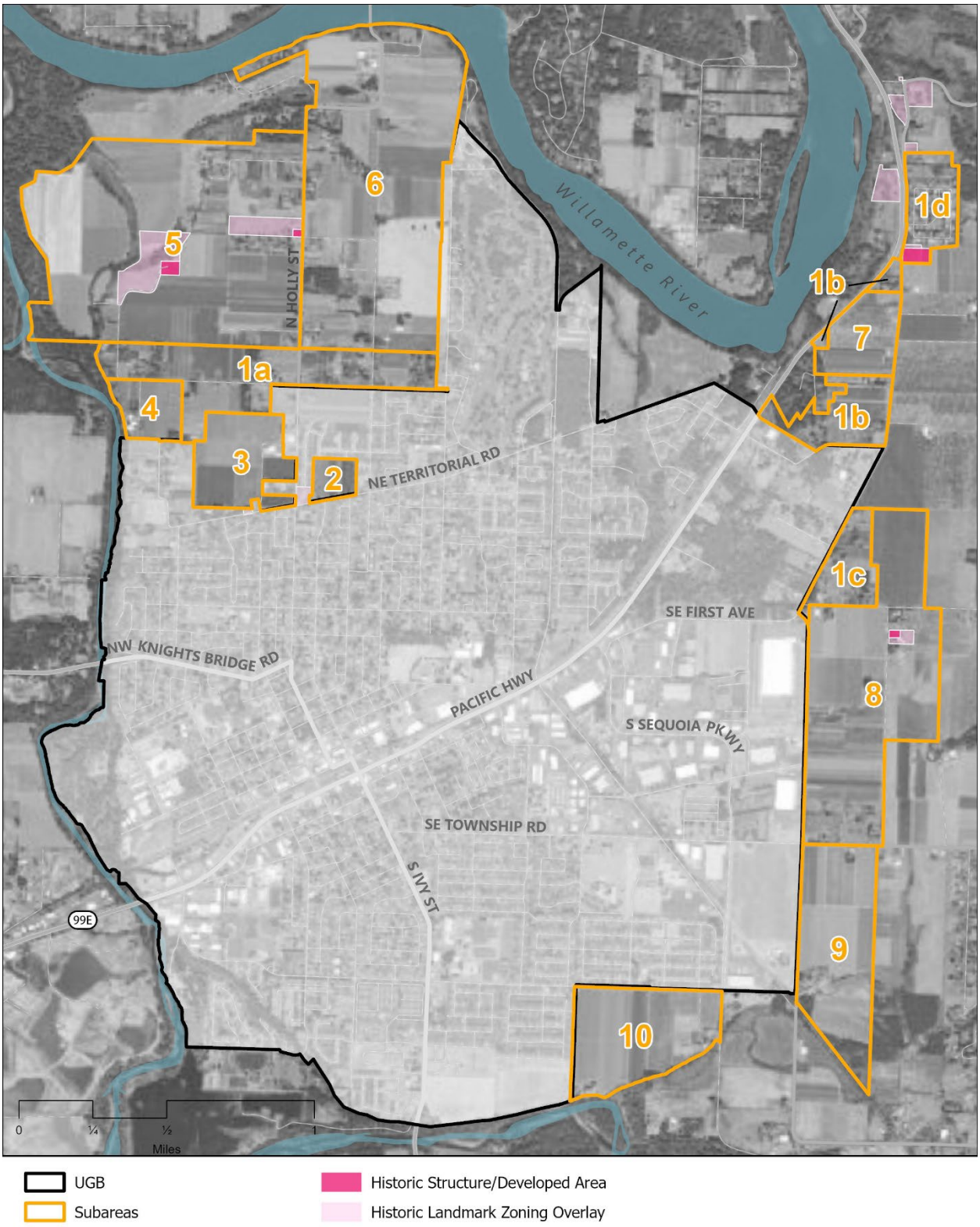
Fourth Priority for inclusion into the UGB are areas of predominantly high-value farm or forest land. The Fourth Priority inclusion criteria state that a city may not select land that is predominantly made up of prime or unique farm soils, as defined by the USDA NRCS, unless there is an insufficient amount of other land to satisfy its land need. With 98.8 acres of land need accommodated in the First Priority lands, there is a remaining land need of up to 439.2 acres after the suitability analysis for first priority lands determined that all exception lands are suitable for inclusion. The remaining non-exception resource land is being considered for Fourth Priority inclusion into the UGB to meet the land need.

Subareas 2, 3, 4, 5, 6, 7, 8, 9, and 10 collectively have more than enough land to satisfy the identified need. The following tables demonstrate the suitability for inclusion to meet the remaining land need using the suitability criteria of OAR 660-024-0067(5). For residential and commercial uses, parcels of less than 2 acres, parcels that meet exclusion criteria (slopes of 25% or more), and parcels with Goal 5 resources are excluded. For industrial uses, parcels of less than 5 acres, parcels that meet exclusion criteria (slopes of 10% or more), and parcels with Goal 5 resources are excluded.

Goal 5 resources considered unsuitable include portions of parcels that contain historic resources. Clackamas County Goal 5 resource data identifies four historic structures that have a Clackamas County Historic Landmark (HL) overlay within the Study Area, as shown in Figure 16.

- **Kraft-Brandes-Culbertson Farmstead.** Located at 2525 N. Baker Drive, this site includes the historic barn and water tower. (Subarea 5)
- **Olson, Olaf E & Anna House.** Located at 3019 N. Holly Street, this site includes a historic garage, pumphouse, machine shed, and chicken coup. (Subarea 5)
- **Bradtl, John, Farm.** Located at 10012 S New Era Road, this site includes a historic pumphouse, smokehouse, granary, pig shed, and milk shed. (Subarea 1d)
- **Freeze, Harvey & Anna, Farm.** Located at 23300 S. Blount Road, this site includes a historic woodshed and pumphouse. (Subarea 8). The farm house is recognized for its architectural and cultural integrity and the property was officially designated as a Clackamas County Historic Landmark in 2007 and received a 2026 DeMuro Award for renovation.

Figure 16. Exclusion of Historic Landmarks.



The tax lots on which the historic structures are located are much larger than the structure(s) or Clackamas County Historic Landmark Zoning Overlay (HLZO) protections. For each of the four sites, the acreage of the footprint of the historic structure(s) was removed from the site as undevelopable, but the rest of the Clackamas County Historic Landmark Zoning Overlay (HLZO) and tax lot was left in the inventory (Table 14). One of the properties, the Kraft Brandes Culbertson Farmstead, is on the National Register of Historic Places.

Table 14. Historic Resources Sites and Acreage

Site	HLZO Acres	Structure(s) Acres
Kraft Brandes Culbertson Farmstead	19.98	1.89
Olson, Olaf & Anna House	9.86	0.47
Bradtl, John Farm	2.51	2.51
Freeze, Harvey & Anna, Farm	2.48	0.61
TOTAL	34.83	5.48

Fourth Priority Suitability Criteria

As shown in Table 15, there are 1,316.3 acres of fourth priority land in the Study Area, of which 1,077.1 acres are considered suitable to meet the land need for commercial uses after applying the suitability criteria of OAR 660-024-0067(5)(f-g). This amount of land exceeds the amount necessary to satisfy the less than one acre commercial land deficiency.

Table 15. Fourth Priority Lands Suitability – Commercial

Subarea	Total Acres	# of Tax Lots	# of Tax Lots ≤2 Acres	Primarily 2 Acres or Less	Exclusion Acres [5]	Goal 5 Acres [6]	Suitable Acres [7]
2	13.0	1	0	No	0.0	0.0	13.0
3	60.8	3	0	No	0.0	0.0	60.8
4	27.8	3	1	No	0.0	0.0	27.8
5	392.5	26	4	No	163.1	18.9	226.6
6	345.8	60	29	No	8.4	28.0	315.6
7	40.5	3	1	No	0.0	0.2	40.3
8	288.0	19	3	No	0.0	0.6	227.4
9	112.0	2	1	No	42.0	4.3	69.9
10	95.9	5	2	No	0.0	0.1	95.8
Total	1,316.3	129	44	-	213.7	52.0	1,077.1

The City also considered the specific suitability criteria for Industrial Uses for employment land need because there is a high need for industrial land determined in the EOA, as shown in Table 16.

[5] Goal 5 resources include (Clackamas County GIS): Willamette River Greenway, Riparian Buffer (based on Stream Creeks Buffer attribute), Wetlands (via Title3_Wetlands layer), Historic Landmarks (via Zoning reduced to developed area of parcel).

[6] Exclusion/Constraints include: Open Water, Floodplain, 25% slopes /10% for industrial.

[7] Acreage deductions may overlap (e.g., Exclusion Acres, Goal 5 Acres, 25%/10% Slope Acres) so that Suitable Acres do not reflect a total deduction of each deduction column.

Table 16. Fourth Priority Lands Suitability – Industrial

Subarea	Total Acres	# of Tax Lots	Acres of Tax Lots <5 Acres	Exclusion Acres	Goal 5 Acres	10% Slope Acres	Suitable Acres
2	13.0	1	0.0	0.0	0	0	13.0
3	60.8	3	0.0	0.0	0	0	60.8
4	27.8	3	1.2	0.0	0	0	26.6
5	392.5	26	11.6	163.1	18.9	20.7	195.3
6	345.8	60	87.6	8.4	28.0	27.9	227.1
7	40.5	3	0.2	0.0	0.2	1.6	38.5
8	228.0	19	21.3	0.0	0.6	13.9	192.9
9	112.0	2	0.9	42.1	4.3	1.0	68.0
10	95.9	5	5.2	0.0	0.1	1.1	90.1
Total	1,316.3	122	128.0	213.6	52.1	66.2	912.3

Of the 1,316.3 acres of fourth priority land in Study Area 912.3 acres are suitable for industrial employment uses after applying the suitability criteria of OAR 660-024-0067(5)(d). This amount of land exceeds the amount necessary to satisfy the need deficiency.

Table 17 shows that the 1,316.3 gross acres of fourth priority land has the capacity to meet the residential land need, however, 100% of Canby's residential land need can be accommodated in first priority lands.

Table 17. Fourth Priority Lands Capacity – Residential

Subarea	Total Acres (Gross)	Total Lots	Lots >2 Acres	Capacity for New Housing – Units
2	13.0	1	1	78
3	60.8	3	3	374
4	27.8	3	2	160
5	392.4	26	22	1,405
6	345.8	60	31	1,795
7	40.5	3	2	232
8	227.9	19	16	1,313
9	112.0	2	1	463
10	95.9	5	3	546
Total	1,316.3	122	88	6,366

5. Goal 14 Location Factors Analysis

With an excess of suitable fourth priority lands, the subareas must be analyzed with the Goal 14 Location Factors pursuant to OAR 660-024-0067(1)(c) to determine which of the subareas are best suited for inclusion into the UGB to satisfy the remaining land need.

A boundary location analysis compares alternative locations and considers which addition to the UGB will result in the most accommodating and cost-effective boundary, while creating the fewest conflicts with neighboring land uses, and causing the least amount of negative environmental, economic, social, and energy consequences through expansion.

The boundary location analysis process is governed by Goal 14 and ORS 197A.285 and with consideration of the following factors:

- Efficient accommodation of identified land needs;
- Orderly and economic provision of public facilities and services;
- Comparative environmental, energy, economic and social consequences; and
- Compatibility of the proposed urban uses with nearby agricultural and forest activities occurring on farm and forest land outside the UGB.

These factors are weighed equally to form a balanced analysis and considered sequentially. The analyses do not provide definitive conclusions as to where the UGB should expand, but rather, provide data necessary for an informed decision about how the City should grow over the coming decades.

Combined, the 20-year land need for residential and associated uses and employment land needs is 538.0 acres. The first priority for inclusion is the 199.9 acres of exception lands, leaving 341.8 acres of unmet land need.

The following sections provide the necessary evaluation of proposed lands being considered for the expansion area.

Goal 14 Location Factor 1

Several criteria determine the efficiency of subarea inclusion – proximity to the existing UGB and city center, average parcel size, and compatibility with adjacent land uses.

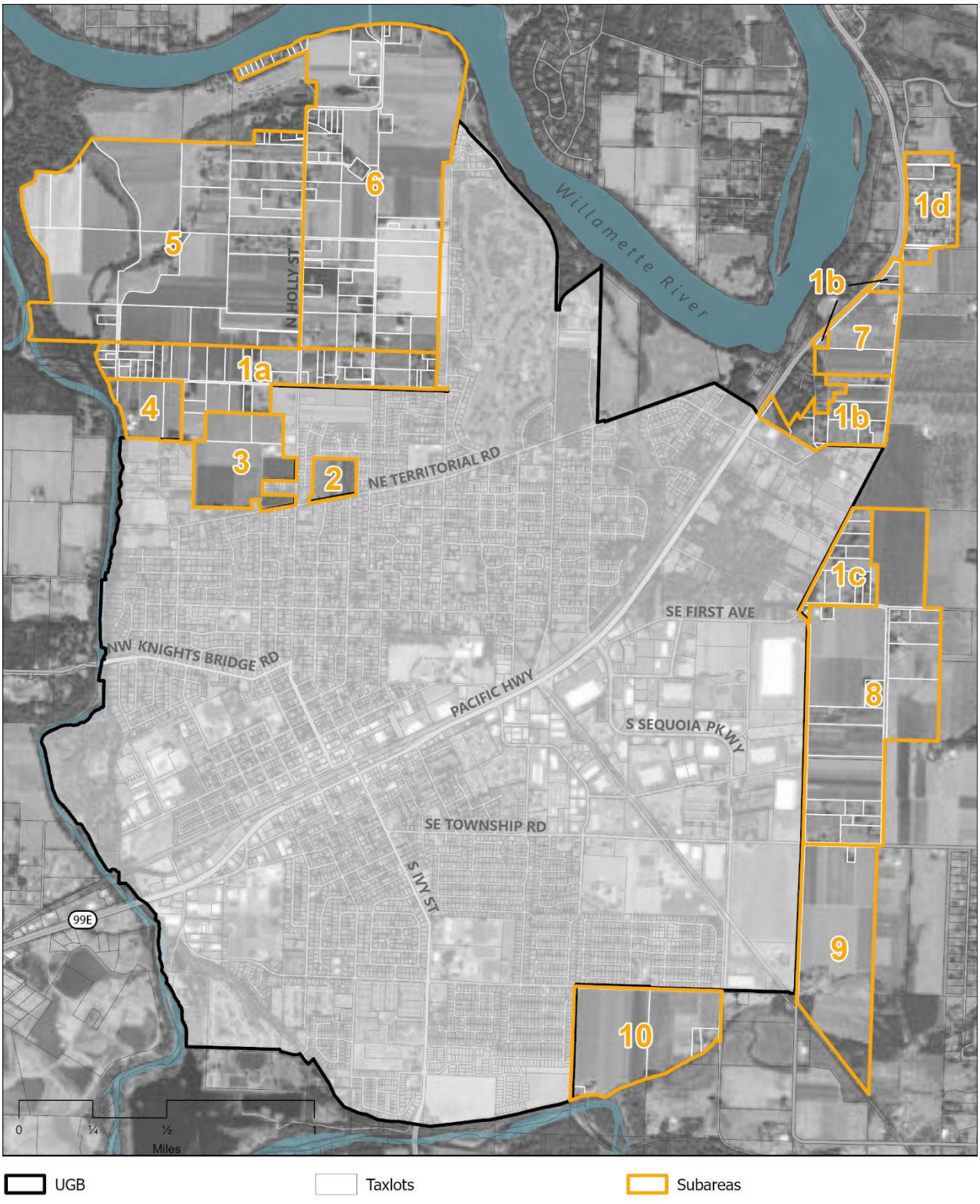
Proximity

Land adjacent to the existing UGB offers multiple benefits:

- Leverages prior infrastructure investments
- Provides access to current services and amenities
- Supports downtown businesses
- Reduces VMT and supports active modes of transportation (walking and biking)
- Increases housing choice and promotes affordability
- Preserves valuable agriculture and forest land

An ideal expansion area is directly adjacent to a current UGB free of major barriers and with all land within ¼ mile of the UGB. “Leapfrog” development is growth that bypasses closer available land, relies on new infrastructure investments, increases car-dependency, and results in greater overall land consumption. Subarea locations and tax lots are shown in Figure 17.

Figure 17. Study Area Subareas and Tax Lots



Parcel Size

Larger parcels facilitate development more efficiently, since smaller parcels often need to be consolidated. Large tracts tend to offer a higher rate of return on investment for developers and as stated above in Chapter 2, the EOA identifies large lots for industrial in the land need. Diversity of tract sizes can also be advantageous for residential and neighborhood-scale commercial land need. Parcel size is also used in calculating the capacity of each subarea to supply new residential units in Table 18. Capacity calculations rely on OAR 660-024-0067(6)(a) for assumptions on parcels less than 2 acres. Parcels greater than 2 acres are calculated on an average density by zone from the Housing Needs Analysis for buildable land (gross acres for all parcels greater than 2 acres minus environmental constraints common to residential development, minus existing structures and right-of-way).

Compatibility

Ensuring that new development is compatible with adjacent uses is an essential component of Location Factor 1 – the efficient accommodation of identified land needs. While the specific focus of Location Factor 4 is compatibility with nearby farm and forest activities, this factor looks at compatibility with adjacent urban uses. Compatibility is essential for maintaining protecting public health, reducing land use conflicts, and the effective use of infrastructure more effectively.

Based on community feedback, residential uses are more appropriate for subareas in the northwest portion of the Study Area (1a, 2, 3, 4, 5, 6). Subareas to the northeast (1b, 1c, 7) could be appropriate for either residential or employment uses. Subarea 1d is currently developed with a manufactured home park, cemetery, and historic structure. Employment uses are more appropriate in the eastern subareas (8, 9). Subarea 10 to the south could be compatible with residential or employment uses.

Table 18 summarizes subareas 2-10 relative to efficiently accommodate identified land needs.

Table 18. Evaluation of Factor 1 Characteristics

Subarea	Evaluation/Comments (Proximity, Parcel Size, Suitable Land)
2	Subarea 2 is very well-suited for efficient residential development • Located entirely within Canby city limits • One 13-acre parcel • All of the 13 acres are suitable for residential development
3	Subarea 3 is very well-suited for efficient residential development • Surrounded on three sides by Canby city limits • 3 parcels totaling nearly 61 acres • Nearly all of the 61 acres are suitable for residential development
4	Subarea 4 is well-suited for efficient residential development • South boundary abuts Canby city limits; north and east boundaries abuts exception land (subarea 1a) • 3 parcels totaling 27.8 acres • All 27.8 acres are suitable for residential development • Subarea 4 is currently operating as a very successful dahlia farm. Swan Island Dahlias is a cultural institution and economic generator in Canby and is unlikely to be redeveloped in the future. [8]

[8] A Swan Island Dahlias Forever Stamp was released in April 2025. 2025 - Dahlia Stamp Release April 26, 2025 | Swan Island Dahlias | Swan Dahlias

Subarea	Evaluation/Comments (Proximity, Parcel Size, Suitable Land)
5	Subarea 5 is not currently well-suited for efficient urban development • Does not abut Canby city limits; south boundary abuts exception land (subarea 1a) • 26 parcels totaling 393 gross acres; includes 381 acres on 20 parcels larger than 5 acres • 226.6 of 392 acres are suitable for residential use due to significant Goal 5 constraints
6	Subarea 6 is well-suited for efficient residential development • Most of east boundary abuts Canby city limits; south boundary abuts exception land (subarea 1a) • 60 parcels totaling 346 gross acres; includes 258 acres on 15 parcels larger than 5 acres; nearly half the parcels are less than one acre • 315.6 of 346 acres are suitable for residential use
7	Subarea 7 is well-suited for efficient urban development • Does not abut Canby city limits; south boundary abuts exception land (subarea 1b) • 3 parcels totaling 40.5 gross acres; includes 40.3 acres on 2 parcels larger than 5 acres • 38.5 acres are suitable for industrial use
8	Subarea 8 is very well-suited for efficient employment development • West boundary abuts Canby city limits; north boundary abuts exception land (subarea 1c) • 19 parcels totaling 228 gross acres; includes 207 acres on 10 parcels larger than 5 acres • 192.9 acres are suitable for industrial use
9	Subarea 9 is well-suited for efficient employment development • West boundary abuts Canby city limits • 2 parcels totaling 112 gross acres; including 111 acres on 1 parcel • 68.0 acres are suitable for industrial use
10	Subarea 10 is very well-suited for efficient urban development • West and north boundaries abut Canby city limits • 5 parcels totaling 96 gross acres; includes 91 acres on 2 parcels larger than 5 acres • 90.1 acres are suitable for industrial use

Findings

Contiguousness with existing city limits/UGB is the most practical and efficient means for expansion. Subarea 2 lies entirely within the existing boundary. Subareas 3, 4, 6, 8, 9, and 10 are all contiguous with the existing boundary and several (3, 4, 6, 8) are also contiguous with exception land. Subarea 7 is surrounded by exception land that will be brough into the UGB but is not contiguous with the existing boundary. Subarea 5 is contiguous with exception land, but not with the existing boundary.

The 74 acres of unconstrained land in subareas 2 and 3 are the best candidates for residential expansion due to their location land in between the existing UGB and the identified exception land. They are not suitable for industrial uses due to adjacent residential development. Subareas 8 and 9 are the best candidates for industrial expansion given proximity to the existing UGB and the presence of large parcels, even though the amount of suitable land is lower due to environmental constraints.

Goal 14 Location Factor 2

Factor 2 requires the City to consider opportunities for orderly and economic provision of public facilities and services. This section focuses on provision of roads, water, sanitary, and wastewater services and evaluates the advantages and disadvantages for expansion for each subarea for these services.

TRANSPORTATION

The transportation goals and objectives in the OAR Chapter 660 Division 12, Transportation Planning were reviewed to help inform the development of the transportation evaluation criteria for the UGB expansion subareas. The relevant objectives included as part of Chapter 660 are identified below:

(a) Provide safe transportation for all Oregonians;

(b) Promote the development of transportation systems adequate to serve statewide, regional, and local transportation needs;

(c) Provide a transportation system that serves the mobility and access needs of those who cannot drive and other underserved populations;

(d) Provide for affordable, accessible and convenient transit, pedestrian, and bicycle access and circulation, with improved connectivity to destinations people want to reach, such as education facilities, workplaces, services, shopping, places of worship, parks, open spaces, and community centers;

(e) Reduce pollution from transportation to meet statewide statutory and executive goals to reduce climate pollution;

(f) Recognize and remedy impacts of past practices that have harmed underserved populations, such as redlining, displacement, exclusionary zoning, inaccessible design, and roadway and other public infrastructure siting;

(g) Engage underserved populations in decision-making and prioritize investments serving those communities;

(h) Facilitate the safe flow of freight, goods, and services within regions and throughout the state through a variety of modes including road, air, rail, and marine transportation;

(i) Protect the functions of existing and planned transportation facilities, corridors, and sites;

(j) Provide for the construction and implementation of transportation facilities, improvements, and services necessary to support acknowledged comprehensive plans;

(k) Identify how transportation facilities are provided on rural lands consistent with the statewide planning goals;

(l) Protect and restore safe passage for fish and wildlife, flood waters, and other natural system functions at roadway crossings of waterbodies and other native habitat corridors;

(m) Require coordination among affected local governments and transportation service providers and consistency between state, regional, and local transportation plans; and

(n) Encourage changes to comprehensive plans to be supported by adequate planned transportation facilities for all modes.

The following transportation evaluation criteria were used to qualitatively assess the subareas considered for potential UGB expansion against Factor 2 for transportation:

- **Accessibility and Connectivity**: Has proximity to convenient and accessible transportation facilities for all users that allows for multi-modal connections to destinations throughout the city and beyond.

- **Safety and Security**: Has safe and convenient multi-modal access to destinations for people of all ages and abilities.
- **Healthy People and Environment**: Allows for new multi-modal facilities that protect the natural, cultural, and developed environments and encourage healthy and active living for all.
- **Equity**: Allows for new multi-modal facilities that eliminate transportation related disparities and barriers and are affordable for all users.
- **Reliability and Efficiency**: Allows for an integrated and connected system of roadways, transit and bicycle and pedestrian facilities.
- **Fiscal Responsibility**: Allows for a transportation system that maximizes assets, minimizes costs, and enhances the surrounding community through right sized infrastructure.

The evaluation criteria were used to qualitatively assess the subareas 2-10 considered for potential UGB expansion against Factor 2 for transportation, as shown in Tables 19–27.

Table 19. Evaluation of Factor 2, Subarea 2 (Transportation)

Evaluation Criteria	IDEAL DEFINITION	COMMENTS
ACCESSIBILITY AND CONNECTIVITY	Close proximity to convenient and accessible transportation facilities for all users that allows for multi-modal connections to destinations throughout the city and beyond.	Opportunities to integrate collector street or neighborhood route connections via N Ivy Street and NE Territorial Road. Nearby arterial connections are available to the south via N Knights Bridge Road and N Ivy Street, but these connections require travel through the existing residential neighborhoods in the UGB.
SAFETY AND SECURITY	Safe and convenient multi-modal access to destinations for people of all ages and abilities.	Area is near downtown Canby and its essential destinations (e.g., schools, parks, library, downtown amenities).
HEALTHY PEOPLE AND ENVIRONMENT	Allows for new multi-modal facilities that protect the natural, cultural, and developed environments and encourage healthy and active living for all.	No known constraints.
EQUITY	Allows for new multi-modal facilities that eliminate transportation related disparities and barriers and are affordable for all users.	Local street and multi-modal extensions from adjacent areas are feasible.
RELIABILITY AND EFFICIENCY	Allows for an integrated and connected system of roadways, transit and bicycle and pedestrian facilities.	Future development can be integrated into the adjacent multimodal system due to its proximity to established neighborhoods in the existing UGB.
FISCAL RESPONSIBILITY	Allows for a transportation system that maximizes assets, minimizes costs, and enhances the surrounding community through right sized infrastructure.	Urban standard roadway upgrades would be needed along NE Territorial Road in the subarea. This area would increase travel through the existing residential neighborhoods in the UGB that may necessitate infrastructure to encourage safe travel speeds and volumes in those areas.
SUMMARY	Subarea 2 fully meets all criteria except for Fiscal responsibility, which it meets partially. Subarea 2 has the potential to naturally tie into the existing Canby transportation infrastructure. However, some of this infrastructure will require urban upgrades to support future development. The subarea is near the established portion of Canby, and has accessible, safe, and convenient multimodal access to essential destinations.	

Table 20. Evaluation of Factor 2, Subarea 3 (Transportation)

Evaluation Criteria	IDEAL DEFINITION	COMMENTS
ACCESSIBILITY AND CONNECTIVITY	Close proximity to convenient and accessible transportation facilities for all users that allows for multi-modal connections to destinations throughout the city and beyond.	There are opportunities to integrate collector street or neighborhood route connections via N Holly Street and NE Territorial Road towards the east end of this area. However, the west end of this area has challenges with integrating with an existing collector such as N Birch Street given existing development patterns, although an extension of N Grant Street is possible. Nearby arterial connections are available to the south via N Knights Bridge Road and N Ivy Street, but these connections require travel through the existing residential neighborhoods in the UGB.
SAFETY AND SECURITY	Safe and convenient multi-modal access to destinations for people of all ages and abilities.	The area is near downtown Canby and its essential destinations (e.g., schools, parks, library, downtown amenities).
HEALTHY PEOPLE AND ENVIRONMENT	Allows for new multi-modal facilities that protect the natural, cultural, and developed environments and encourage healthy and active living for all.	No known constraints have been identified.
EQUITY	Allows for new multi-modal facilities that eliminate transportation related disparities and barriers and are affordable for all users.	Local street and multi-modal extensions from the adjacent areas are feasible on the east side of this subarea. Connections to serve the west side of this subarea are hindered by existing development.
RELIABILITY AND EFFICIENCY	Allows for an integrated and connected system of roadways, transit and bicycle and pedestrian facilities.	Future development can be integrated into the adjacent multimodal system due to its proximity to established neighborhoods in the existing UGB.
FISCAL RESPONSIBILITY	Allows for a transportation system that maximizes assets, minimizes costs, and enhances the surrounding community through right sized infrastructure.	Urban standard roadway upgrades would be needed along N Holly Street and NE Territorial Road in the subarea. This area has more reliance on N Holly Street and may require an adjacent collector connection. It also increases travel through the existing residential neighborhoods in the UGB that may necessitate infrastructure to encourage safe travel speeds and volumes in those areas.
SUMMARY	Subarea 3 fully meets criteria for Safety and Security, Healthy People and Environment, and Reliability and Efficiency, and partially meets criteria on accessibility and connectivity, equity, and fiscal responsibility. Subarea 3 has the potential to tie into the existing Canby transportation infrastructure, but not as well as Subarea 2. The existing land uses that occupy most of the area to the south of this subarea limit connectivity in that direction. To establish connectivity, the eastern portion of the area would likely need to develop first and integrate into existing street networks. However, this subarea is near the established portion of Canby, and has accessible, safe, and convenient multimodal access to essential destinations.	

Table 21. Evaluation of Factor 2, Subarea 4 (Transportation)

Evaluation Criteria	IDEAL DEFINITION	COMMENTS
ACCESSIBILITY AND CONNECTIVITY	Has close proximity to convenient and accessible transportation facilities for all users that allows for multi-modal connections to destinations throughout the city and beyond.	There are opportunities to integrate collector street or neighborhood route connections via N Birch Street and NE Territorial Road. However, these will require urban standard roadway upgrades through undeveloped areas inside the current UGB. Nearby arterial connections are available to the south via N Knights Bridge Road and N Ivy Street, but these connections require travel through the existing residential neighborhoods in the UGB.
SAFETY AND SECURITY	Has safe and convenient multi-modal access to destinations for people of all ages and abilities.	The area is near downtown Canby and its essential destinations (e.g., schools, parks, library, downtown amenities).
HEALTHY PEOPLE AND ENVIRONMENT	Allows for new multi-modal facilities that protect the natural, cultural, and developed environments and encourage healthy and active living for all.	This subarea borders the Molalla River, and any future development must establish appropriate barriers.
EQUITY	Allows for new multi-modal facilities that eliminate transportation related disparities and barriers and are affordable for all users.	New development may attract more vehicular centric activity in an area with limited active transportation connectivity to the existing UGB. N Birch Street will need to be upgraded to provide balanced modal options accessing the subarea.
RELIABILITY AND EFFICIENCY	Allows for an integrated and connected system of roadways, transit and bicycle and pedestrian facilities.	Future development can be integrated into the adjacent multimodal system with urban standard roadway upgrades along N Birch Street in the existing UGB to connect to the established neighborhoods to the south.
FISCAL RESPONSIBILITY	Allows for a transportation system that maximizes assets, minimizes costs, and enhances the surrounding community through right sized infrastructure.	Urban standard roadway upgrades would be needed along N Birch Street in the subarea, and along segments of N Birch Street in the existing UGB. This area has more reliance on N Birch Street and may require an adjacent collector connection. It also increases travel through the existing residential neighborhoods in the UGB that may necessitate infrastructure to encourage safe travel speeds and volumes in those areas.
SUMMARY	Subarea 4 fully meets the criterion on Safety and Security and partially meets the remaining criteria. Subarea 4 has the potential to tie into the existing Canby transportation infrastructure, but not as well as Subareas 2 or 3. In comparison to those subareas, it requires more urban standard roadway upgrades in the existing UGB to provide accessible, safe, and convenient multimodal access to essential destinations in the established portion of Canby.	

Table 22. Evaluation of Factor 2, Subarea 5 (Transportation)

Evaluation Criteria	IDEAL DEFINITION	COMMENTS
ACCESSIBILITY AND CONNECTIVITY	Has close proximity to convenient and accessible transportation facilities for all users that allows for multi-modal connections to destinations throughout the city and beyond.	There are opportunities to integrate collector street or neighborhood route connections via N Holly Street and N Birch Street. However, these will require urban standard roadway upgrades through undeveloped areas inside and outside of the current UGB. Nearby arterial connections are available to the south via N Knights Bridge Road and N Ivy Street, but these connections require travel through the existing residential neighborhoods in the UGB.
SAFETY AND SECURITY	Has safe and convenient multi-modal access to destinations for people of all ages and abilities.	The subarea is reasonably close to downtown Canby and its essential destinations (e.g., schools, parks, library, downtown amenities).
HEALTHY PEOPLE AND ENVIRONMENT	Allows for new multi-modal facilities that protect the natural, cultural, and developed environments and encourage healthy and active living for all.	This subarea borders the Molalla River and includes some natural environments, and any future development must establish appropriate barriers.
EQUITY	Allows for new multi-modal facilities that eliminate transportation related disparities and barriers and are affordable for all users.	New development may attract more vehicular centric activity in an area with limited active transportation connectivity to the existing UGB. N Holly Street and N Birch Street will need to be upgraded to provide balanced modal options accessing the subarea.
RELIABILITY AND EFFICIENCY	Allows for an integrated and connected system of roadways, transit and bicycle and pedestrian facilities.	Future development can be integrated into the adjacent multimodal system with urban standard roadway upgrades along N Holly Street and N Birch Street in the existing UGB to connect to the established neighborhoods to the south.
FISCAL RESPONSIBILITY	Allows for a transportation system that maximizes assets, minimizes costs, and enhances the surrounding community through right sized infrastructure.	Urban standard roadway upgrades would be needed along N Holly Street and N Birch Street in the subarea, and along segments of these roadways in the existing UGB. This area increases travel through the existing residential neighborhoods in the UGB that may necessitate infrastructure to encourage safe travel speeds and volumes in those areas.
SUMMARY	Subarea 5 partially meets all evaluation criteria. Subarea 5 has the potential to tie into the existing Canby transportation infrastructure, but not as well as Subareas 2 or 3. Similar to Subarea 4, it requires more urban standard roadway upgrades in the existing UGB to provide accessible, safe, and convenient multimodal access to essential destinations in the established portion of Canby.	

Table 23. Evaluation of Factor 2, Subarea 6 (Transportation)

Evaluation Criteria	IDEAL DEFINITION	COMMENTS
ACCESSIBILITY AND CONNECTIVITY	Has close proximity to convenient and accessible transportation facilities for all users that allows for multi-modal connections to destinations throughout the city and beyond.	There are opportunities to integrate collector street or neighborhood route connections via N Holly Street, N Locust Street and N Maple Street. Nearby arterial connections are available to the south via N Knights Bridge Road and N Ivy Street, but these connections require travel through the existing residential neighborhoods in the UGB.
SAFETY AND SECURITY	Has safe and convenient multi-modal access to destinations for people of all ages and abilities.	The subarea is reasonably close to downtown Canby and its essential destinations (e.g., schools, parks, library, downtown amenities).
HEALTHY PEOPLE AND ENVIRONMENT	Allows for new multi-modal facilities that protect the natural, cultural, and developed environments and encourage healthy and active living for all.	This subarea borders the Willamette River and includes some natural environments, and any future development must establish appropriate barriers.
EQUITY	Allows for new multi-modal facilities that eliminate transportation related disparities and barriers and are affordable for all users.	New development may attract more vehicular centric activity in an area with limited active transportation connectivity to the existing UGB. N Holly Street, N Locust Street and N Maple Street will need to be upgraded to provide balanced modal options accessing the subarea.
RELIABILITY AND EFFICIENCY	Allows for an integrated and connected system of roadways, transit and bicycle and pedestrian facilities.	Future development can be integrated into the adjacent multimodal system with urban standard roadway upgrades along N Holly Street, N Locust Street and N Maple Street in the existing UGB to connect to the established neighborhoods to the south.
FISCAL RESPONSIBILITY	Allows for a transportation system that maximizes assets, minimizes costs, and enhances the surrounding community through right sized infrastructure.	Urban standard roadway upgrades would be needed along N Holly Street, N Locust Street and N Maple Street in the subarea, and along segments of these roadways in the existing UGB. This area increases travel through the existing residential neighborhoods in the UGB that may necessitate infrastructure to encourage safe travel speeds and volumes in those areas.
SUMMARY	Subarea 6 partially meets all evaluation criteria. Subarea 6 has a higher potential to tie into the existing Canby transportation infrastructure with multiple north-south travel routes compared to Subareas 4 or 5, but similarly it requires more urban standard roadway upgrades in the existing UGB to provide accessible, safe, and convenient multimodal access to essential destinations in the established portion of Canby.	

Table 24. Evaluation of Factor 2, Subarea 7 (Transportation)

Evaluation Criteria	IDEAL DEFINITION	COMMENTS
ACCESSIBILITY AND CONNECTIVITY	Has close proximity to convenient and accessible transportation facilities for all users that allows for multi-modal connections to destinations throughout the city and beyond.	There are opportunities to integrate collector street or neighborhood route connections via Haines Road. Nearby arterial connections are available to the west via OR 99E.
SAFETY AND SECURITY	Has safe and convenient multi-modal access to destinations for people of all ages and abilities.	Area is isolated, with access to and from the area being vehicle centric with no walking, biking, or rolling facilities to/from the subarea.
HEALTHY PEOPLE AND ENVIRONMENT	Allows for new multi-modal facilities that protect the natural, cultural, and developed environments and encourage healthy and active living for all.	No known constraints have been identified.
EQUITY	Allows for new multi-modal facilities that eliminate transportation related disparities and barriers and are affordable for all users.	New development may attract more vehicular centric activity in an area with limited active transportation connectivity to the existing UGB. Haines Road and its intersection with OR 99E will need to be upgraded to provide balanced modal options accessing the subarea.
RELIABILITY AND EFFICIENCY	Allows for an integrated and connected system of roadways, transit and bicycle and pedestrian facilities.	Future development can be integrated into the adjacent multimodal system with urban standard roadway upgrades along Haines Road in the existing UGB to connect to the established areas to the southwest.
FISCAL RESPONSIBILITY	Allows for a transportation system that maximizes assets, minimizes costs, and enhances the surrounding community through right sized infrastructure.	Urban standard roadway upgrades would be needed along Haines Road in the subarea, and along segments of this roadways in the existing UGB. Upgrades will also be needed at the OR 99E intersection with Haines Road.
SUMMARY	Subarea 7 fully meets criteria for Accessibility and Connectivity, and Healthy People and Environment. It partially meets criteria for Reliability and Efficiency and negatively impacts the remaining criteria. In Subarea 7, local mobility, safe access, and balanced multimodal connectivity to the established infrastructure in the existing UGB to the southwest are limited by the need for significant urban upgrades along Haines Road and at the OR 99E intersection with Haines Road.	

Table 25. Evaluation of Factor 2, Subarea 8 (Transportation)

Evaluation Criteria	IDEAL DEFINITION	COMMENTS
ACCESSIBILITY AND CONNECTIVITY	Has close proximity to convenient and accessible transportation facilities for all users that allows for multi-modal connections to destinations throughout the city and beyond.	There are opportunities to integrate collector street or neighborhood route connections via Mulino Road, Township Road, SE 4th Avenue and Bremer Road. Nearby arterial connections are available to the north via OR 99E, accessed via collector roadways in the existing UGB.
SAFETY AND SECURITY	Has safe and convenient multi-modal access to destinations for people of all ages and abilities.	Access to Mulino Road and Township Road provide connections to essential destinations (schools, downtown amenities). Area connectivity will rely on upgrades to rural unimproved roadways.
HEALTHY PEOPLE AND ENVIRONMENT	Allows for new multi-modal facilities that protect the natural, cultural, and developed environments and encourage healthy and active living for all.	This subarea includes some natural environments, and any future development must establish appropriate barriers.
EQUITY	Allows for new multi-modal facilities that eliminate transportation related disparities and barriers and are affordable for all users.	Local street and multi-modal extensions from the adjacent areas are feasible.
RELIABILITY AND EFFICIENCY	Allows for an integrated and connected system of roadways, transit and bicycle and pedestrian facilities.	Future development can be integrated into the adjacent multimodal system due to its proximity to established areas in the existing UGB.
FISCAL RESPONSIBILITY	Allows for a transportation system that maximizes assets, minimizes costs, and enhances the surrounding community through right sized infrastructure.	Urban standard roadway upgrades would be needed along Mulino Road, Township Road and Bremer Road, and SE 4th Avenue will need to be extended into the subarea.
SUMMARY	Subarea 8 partially meets criteria for Safety and Security, and Healthy People and Environment, and fully meets the remaining criteria. Subarea 8 has strong regional mobility potential due to its proximity to nearby arterial and collector roadways, and multiple connections to OR 99E. This Subarea has strong opportunities for a mix of uses and development types.	

Table 26. Evaluation of Factor 2, Subarea 9 (Transportation)

Evaluation Criteria	IDEAL DEFINITION	COMMENTS
ACCESSIBILITY AND CONNECTIVITY	Has close proximity to convenient and accessible transportation facilities for all users that allows for multi-modal connections to destinations throughout the city and beyond.	There are opportunities to integrate collector street or neighborhood route connections via Mulino Road and Township Road. Nearby arterial connections are available to the north via OR 99E, accessed via collector roadways in the existing UGB.
SAFETY AND SECURITY	Has safe and convenient multi-modal access to destinations for people of all ages and abilities.	Access to Mulino Road and Township Road provide connections to essential destinations (schools, downtown amenities). Area connectivity will rely on upgrades to rural unimproved roadways.
HEALTHY PEOPLE AND ENVIRONMENT	Allows for new multi-modal facilities that protect the natural, cultural, and developed environments and encourage healthy and active living for all.	No known constraints have been identified.
EQUITY	Allows for new multi-modal facilities that eliminate transportation related disparities and barriers and are affordable for all users.	Local street and multi-modal extensions from the adjacent areas are feasible.
RELIABILITY AND EFFICIENCY	Allows for an integrated and connected system of roadways, transit and bicycle and pedestrian facilities.	Future development can be integrated into the adjacent multimodal system due to its proximity to established areas in the existing UGB.
FISCAL RESPONSIBILITY	Allows for a transportation system that maximizes assets, minimizes costs, and enhances the surrounding community through right sized infrastructure.	Urban standard roadway upgrades would be needed along Mulino Road and Township Road in the subarea.
SUMMARY	Subarea 9 partially meets the criterion for Safety and Security and fully meets the remaining criteria. Subarea 9 is similar to Subarea 8, in that it has strong regional mobility potential due to its proximity to nearby arterial and collector roadways, and multiple connections to OR 99E. This Subarea again has strong opportunities for a mix of uses and development types.	

Table 27. Evaluation of Factor 2, Subarea 10 (Transportation)

Evaluation Criteria	IDEAL DEFINITION	COMMENTS
ACCESSIBILITY AND CONNECTIVITY	Has close proximity to convenient and accessible transportation facilities for all users that allows for multi-modal connections to destinations throughout the city and beyond.	There are opportunities to integrate collector street or neighborhood route connections via Sequoia Parkway. Nearby arterial connections are available via SE 13th Avenue.
SAFETY AND SECURITY	Has safe and convenient multi-modal access to destinations for people of all ages and abilities.	Access to SE 13th Avenue and Sequoia Parkway provide connections to essential destinations (schools, parks, downtown amenities).
HEALTHY PEOPLE AND ENVIRONMENT	Allows for new multi-modal facilities that protect the natural, cultural, and developed environments and encourage healthy and active living for all.	No known constraints have been identified.
EQUITY	Allows for new multi-modal facilities that eliminate transportation related disparities and barriers and are affordable for all users.	Local street and multi-modal extensions from the adjacent areas are feasible.
RELIABILITY AND EFFICIENCY	Allows for an integrated and connected system of roadways, transit and bicycle and pedestrian facilities.	Future development can be integrated into the adjacent multimodal system due to its proximity to established areas in the existing UGB.
FISCAL RESPONSIBILITY	Allows for a transportation system that maximizes assets, minimizes costs, and enhances the surrounding community through right sized infrastructure.	Urban standard roadway upgrades would be needed along SE 13th Avenue in the subarea.
SUMMARY	Subarea 10 fully meets all criteria. Subarea 10 has a strong potential to naturally tie into the existing transportation infrastructure in the UGB with limited urban upgrades.	

Findings

Subareas 2, 3, 8, 9, and 10 provide the best opportunities for using existing transportation services and the most economical areas for UGB expansion considering roads in Canby.

UTILITIES

Utility criteria examine existing services and soil groups to establish suitability for water, sewer, and stormwater services. Utility improvements required to serve subareas 2-10 were evaluated by reviewing relevant plans and policies, utility master plans, existing infrastructure mapping, location of subareas, and other relevant information obtained from City staff. Utility service needs of the UGB expansion areas were evaluated based on the following criteria.

Water Service

- Does the subarea have existing water infrastructure to support development?
- Does the subarea have planned water infrastructure upgrades to support development?
- Is a mainline extension required to serve the subarea?
- Are there any identified deficiencies within or adjacent to the subarea?
- Relative to other options, what is the cost to provide service?

Sanitary Sewer Service

- Does the subarea have existing sanitary infrastructure to support development?
- Does the subarea have planned sanitary infrastructure upgrades to support development?
- Is a mainline extension required to serve the subarea?
- Are there any identified deficiencies within or adjacent to the subarea?
- Relative to other options, what is the cost to provide service?

Stormwater Service

- Does the subarea have existing storm infrastructure to support development?
- Does the subarea have planned storm infrastructure upgrades to support development?
- Is a mainline extension required to serve the subarea?
- Are there any identified deficiencies within or adjacent to the subarea?
- Relative to other options, what is the cost to provide service?

Table 28 summarizes the evaluation of subareas 2-10 relative to these criteria.

Table 28. Location Factor 2 - Utilities

Subarea	Water Services	Sanitary Sewer Services	Stormwater Services
2	Has existing or planned infrastructure to support development. **Advantages:** Adjacent connections on all sides of subarea. **Disadvantages:** None	Has existing or planned infrastructure to support development. **Advantages:** Adjacent connections on all sides of subarea. **Disadvantages:** None	Has existing or planned infrastructure to support development. **Advantages:** Adjacent connections on all sides of subarea. Soils in subarea suitable for infiltration. **Disadvantages:** None

Subarea	Water Services	Sanitary Sewer Services	Stormwater Services
3	Has existing or planned infrastructure to support development. **Advantages:** Adjacent 12" water pipe east and South of subarea. **Disadvantages:** None	Has existing or planned infrastructure to support development. **Advantages:** Adjacent 8" sewer east and south of subarea. **Disadvantages:** Pipe upsizing in surrounding area may need to occur to support development in subarea.	Has existing or planned infrastructure to support development. **Advantages:** Adjacent stormwater pipe south of subarea (unknown diameter). Soils in subarea suitable for infiltration **Disadvantages:** None
4	No existing water infrastructure. **Disadvantages:** Subarea requires utility extension of other subareas to develop for water services.	No existing sewer infrastructure. **Disadvantages:** Subarea requires utility extension of other subareas to develop for sanitary services.	No existing stormwater infrastructure. **Advantages:** Soils in subarea suitable for infiltration. **Disadvantages:** No nearby storm infrastructure if infiltration is not feasible.
5	No existing water infrastructure. **Disadvantages:** Subarea requires utility extension of other subareas to develop for water services.	No existing sewer infrastructure. **Disadvantages:** Subarea requires utility extension of other subareas to develop for sanitary services.	No existing stormwater infrastructure. **Advantages:** Soils in subarea suitable for infiltration. **Disadvantages:** No nearby storm infrastructure if infiltration is not feasible.
6	Has existing or planned infrastructure to support development. **Advantages:** Adjacent 8" water pipe east of subarea. **Disadvantages:** None	Has existing or planned infrastructure to support development. **Advantages:** Adjacent 8" storm pipe east of subarea. **Disadvantages:** None	Has existing or planned infrastructure to support development. **Advantages:** Adjacent 12" storm pipe east of subarea. Outfall directly into Willamette River is feasible. Soils in subarea suitable for infiltration. **Disadvantages:** None
7	No existing water infrastructure. **Disadvantages:** Subarea requires utility extension through exception lands before developing for water services.	No existing sewer infrastructure. **Disadvantages:** Subarea requires utility extension through exception lands before developing for sanitary services.	No existing stormwater infrastructure. **Advantages:** Soils in subarea suitable for infiltration. **Disadvantages:** No nearby storm infrastructure if infiltration is not feasible.

Subarea	Water Services	Sanitary Sewer Services	Stormwater Services
8	Has existing or planned infrastructure to support development. **Advantages:** Adjacent 12" water pipe west of subarea. Nearby 12" water pipe north of subarea. Can reach subarea with minor extension. **Disadvantages:** None	Has existing or planned infrastructure to support development. **Advantages:** Adjacent 12" sewer pipe west of subarea. **Disadvantages:** None	No existing stormwater infrastructure. **Advantages:** Soils in subarea suitable for infiltration. **Disadvantages:** No nearby storm infrastructure if infiltration is not feasible.
9	Has existing or planned infrastructure to support development. **Advantages:** Adjacent 12" water pipe northwest of subarea for suitable connection. Nearby 14" water pipe west of subarea. Can reach subarea with minor extension. **Disadvantages:** None	Has existing or planned infrastructure to support development. **Advantages:** Adjacent 6" sanitary force main south-west of subarea. Mulino Rd pump station located at South-West corner of subarea. **Disadvantages:** Pump station upsizing likely required to support new development.	No existing stormwater infrastructure. **Advantages:** Soils in subarea suitable for infiltration. **Disadvantages:** No nearby storm infrastructure if infiltration is not feasible.
10	Has existing or planned infrastructure to support development. **Advantages:** Adjacent 14" water pipe north of subarea. **Disadvantages:** None	Has existing or planned infrastructure to support development. **Advantages:** Adjacent 8" sewer on east and north of subarea. **Disadvantages:** Pipe upsizing in surrounding area may need to occur to support development in subarea.	Has existing or planned infrastructure to support development. **Advantages:** Adjacent stormwater pipe north of subarea (unknown diameter). Soils in subarea suitable for infiltration **Disadvantages:** None

Findings

Subareas 2, 3, 6, and 10 could be available for immediate addition to the UGB, with sufficient surrounding utilities for water, storm, and sewer. A soil survey of these areas showed mostly compatible A and B soil groups, which support high infiltration and lead to good conditions for dry well systems to manage stormwater, and is in line with a majority of Canby's existing storm systems. Subareas 8 and 9 each have semi suitable connections for UGB addition, though some upsizing and expansion may need to occur. Subarea 7 will have access to adjacent utilities once exception lands (1b) are developed. Subareas 4 and 5 are not good candidates for immediate addition to the UGB as there are not sufficient utility connections and transportation facilities without substantial expansion or upsizing to the surrounding areas. However, Subarea 7 will have adjacent connections once exception lands brought into the UGB are served by roads and utilities.

Goal 14 Location Factor 3

Location Factor 3 requires research of the Economic, Social, Environmental, and Energy (ESEE) consequences of development in proposed subareas. ESEE consequences determine potential positive or negative impacts of development. Like the other boundary location analyses, the ESEE analysis does not provide a definitive conclusion, but contains information to help inform decision makers.

Economic The economic consequences of developing each subarea include:

- Cost of land/transportation facilities/utilities/services
- Parcel size
- Development potential

Social The social consequences of developing each subarea include:

- Ease of access to services and amenities, such as schools, parks, library, commercial services
- Compatible nearby uses

Environmental (Figure 18) The environmental consequences of developing each subarea include:

- Hazard Risk (slope, floodplain)
- Goal 5 resources present

Energy The energy consequences of developing each subarea include:

- Amount of travel required to and from daily services and amenities
- Infrastructure improvements needed to serve development, such as road construction/improvements, pipe upsizing, and water or wastewater pumps

Table 29 summarizes subareas 2-10 relative to ESEE consequences.

Table 29. Goal 14 Location Factor 3

Subareas	Evaluation/Comments (Economic, Social, Environmental, Energy)
2	The consequences of expanding the UGB to subarea 2 for residential uses are positive overall, but the consequences of expanding the UGB for industrial uses are negative. • Located entirely within Canby city limits, so expansion into this area would promote good urban form. • Surrounded by residential development, making residential development preferable to industrial development. • A good opportunity to meet housing needs due to single ownership and unconstrained land. • Potential utility connections on adjacent lands to the south and very good transportation connectivity. • Low potential negative environmental consequences, such as disturbance of hydric soils, wetlands, or floodplains. • Would require less travel to and from services and amenities, and limited infrastructure improvements (road construction/improvements, pipe upsizing, water or wastewater pumps).

Subareas	Evaluation/Comments (Economic, Social, Environmental, Energy)
3	The consequences of expanding the UGB to subarea 3 for residential uses are positive overall, but the consequences of expanding the UGB for industrial uses are negative. • Abuts Canby city limits on three sides, so expansion into this area would promote good urban form. • Surrounded by residential development, making residential development preferable to industrial development. • A good opportunity to meet housing needs due to single ownership and unconstrained land. • Potential utility connections on adjacent lands and good transportation connectivity. • Low potential negative environmental consequences, such as disturbance of hydric soils, wetlands, or floodplains. • Would require less travel to and from services and amenities, and fewer infrastructure improvements than other areas.
4	The consequences of expanding the UGB to subarea 4 for residential or industrial uses are negative. • South boundary abuts Canby city limits and would promote good urban form. • Could help meet housing needs due to single ownership and unconstrained land. • Home of Swan Island Dahlias, which includes a commercial gift shop and tourism element. Development would require removing this local business and economic generator, and an institution that is important to Canby's history, culture, and identity. • Would require utility extension of other subareas to develop water and sanitary sewer services. • Low potential negative environmental consequences, such as disturbance of hydric soils, wetlands, or floodplains. • Would require more urban standard roadway upgrades than subareas 2 and 3 to provide accessible, safe, and convenient multimodal access to essential destinations in the established portion of Canby.
5	The consequences of expanding the UGB to subarea 5 for residential or industrial uses are negative overall. • Does not abut Canby city limits, so expansion into this area would not promote good urban form. • Not adjacent to residential or industrial development, making potential development incompatible with adjacent uses. • Adequate land and large parcels conducive to development despite environmental constraints. • Potential negative environmental consequences due to significant Goal 5 constraints. • Would require utility extension of other subareas to develop water and sanitary sewer services. • Would require more urban standard roadway upgrades than subareas 2, 3, and 4 to provide accessible, safe, and convenient multimodal access to essential destinations in the established portion of Canby.
6	The consequences of expanding the UGB to subarea 6 for residential uses are positive overall, but the consequences of expanding the UGB for industrial uses are negative. • East boundary abuts Canby city limits, so expansion into this area would promote good urban form. • Adjacent to residential development, making residential development preferable to industrial development. • Adequate land and large parcels conducive to development despite environmental constraints. • Portions of the subarea with hydric soil, but no presence of Goal 5 resources and low hazard risks. • Adjacent water, sanitary sewer, and stormwater utility connections.

Subareas	Evaluation/Comments (Economic, Social, Environmental, Energy)
	• Potential utility connections on adjacent lands and good transportation connectivity relative to subareas 4 and 5, though not as good as subareas 2 and 3. • Better transportation connectivity than subareas 5 with multiple north-south travel routes but would require more urban standard roadway upgrades to provide accessible, safe, and convenient multimodal access to essential destinations.
7	The consequences of expanding the UGB to subarea 7 for residential or industrial uses are neutral. • Primarily adjacent to farmland with some nearby rural residential development, making it most suitable for residential development. • Adequate land and large parcels conducive to development despite some environmental constraints. • Limited negative environmental consequences due to Goal 5 constraints. • Relies on utility extension to Subarea 1b exception lands to develop water and sanitary sewer services. • Connectivity to established infrastructure to the southwest is limited by the need for significant improvements along Haines Road and at the OR 99E intersection with Haines Road
8	The consequences of expanding the UGB for future development in subarea 8 are positive, primarily for industrial uses. • West boundary abuts Canby city limits, so expansion into this area would promote good urban form. • Adjacent to industrial development and farm uses, making industrial development preferable to residential development. • Adequate land and large parcels appropriate for industrial development with limited environmental constraints. • Portions of the subarea with hydric soil, but no presence of Goal 5 resources and low hazard risks. • Adjacent and nearby water, sanitary sewer, and stormwater utility connections. • Strong regional mobility potential due to its proximity to nearby arterial and collector roadways, and multiple connections to OR 99E.
9	The consequences of expanding the UGB for future development in subarea 9 are positive, primarily for industrial uses. • West boundary abuts Canby city limits, so expansion into this area would promote good urban form. • Nearby industrial and residential development and farm uses make it viable for residential or industrial development. • Adequate land and large parcels conducive to development despite environmental constraints. • Southern portion of the site is subject to 100-year floodplain. • Adjacent and nearby water, sanitary sewer, and stormwater utility connections. Sewer pump station upsizing likely required to support new development. • Strong regional mobility potential due to its proximity to nearby arterial and collector roadways, and multiple connections to OR 99E.
10	The consequences of expanding the UGB for future development in subarea 10 are positive, primarily for industrial uses. • West and north boundaries abut Canby city limits, so expansion into this area would promote good urban form. • Adjacent to residential development, farm uses, and the Canby Rod & Gun Club. Residential and industrial development is viable but locating residential development adjacent to the Canby Rod & Gun Club may be challenging. • Adequate land and large parcels appropriate for industrial development with limited environmental constraints. • Limited presence of Goal 5 resources and low hazard risks.

Subareas	Evaluation/Comments (Economic, Social, Environmental, Energy)
	• Adjacent water, sanitary sewer, and stormwater utility connections. Pipe upsizing may be needed to support new development. • Strong potential to naturally tie into the existing transportation infrastructure with limited upgrades

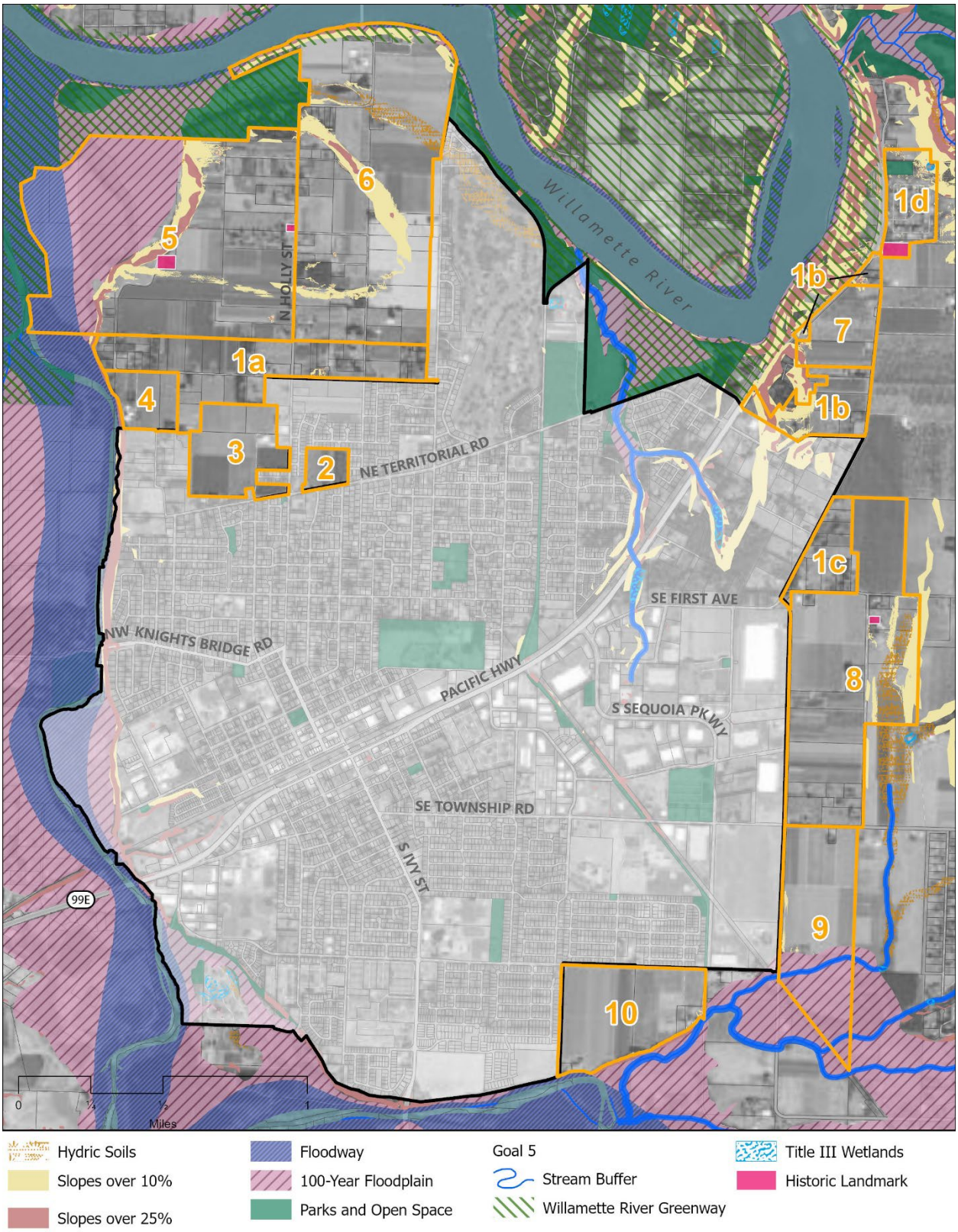
Findings

Subareas 2, 3, 6, 8, 9, and 10 would have the most positive comparative environmental, energy, economic and social consequences due to their location relative to the current UGB, compatibility with surrounding uses, supply of adequate suitable land, and lower costs to connect to the transportation network and serve with public utilities. Subareas 2, 3, 6, and 10 are best suited to accommodate residential land needs, while subareas 8 and 9 are best suited to accommodate industrial land needs. Subarea 7 is adjacent to exception lands that will be brought into the UGB and therefore has fewer positive consequences.

Subarea 5 has more negative comparative environmental, energy, economic and social consequences due to their lack of a contiguous border with existing city limits and higher costs to connect to the transportation network and serve with public utilities. Subarea 1d is also not well-suited due to the existing development pattern.

While adequate due to its location and suitable land, subarea 4 is not suitable for residential or industrial development due to the presence of Swan Island Dahlias, an important economic generator and cultural institution in Canby.

Figure 18. Goal 14 Location Factor 3 – Environmental Consequences



Goal 14 Location Factor 4

Location Factor 4 requires the City to evaluate the study area for compatibility of proposed urban uses with nearby agricultural and forest activities occurring on farm and forest land outside the UGB. The City researched adjacent agricultural and forest uses per subarea. The agricultural and forest uses were determined via data from USDA CropScape (Figure 19), Google Earth, and Clackamas County land use datasets. The following is a summary of compatibility of potential urban development (residential or industrial) with nearby agricultural and forecast activities surrounding each subarea.

Compatibility analysis criteria consider how new development within each subarea might interact with surrounding existing agricultural uses. Here are a few generalized examples:

- One subarea is separated from nearby farm operations by a road or rail-line, and another subarea is surrounded on three side by farms. The area separated from farms by a manmade feature would be more compatible with adjacent urbanization.
- One subarea is adjacent to fields that are being hayed, and another subarea is adjacent to land being used for a centralized animal feeding operation (CAFO). The area being hayed would be more compatible with adjacent urbanization.
- One subarea is adjacent to a dairy that has the potential for near continuous, daily operations.

Noise, odor, spray drift, or specific farming practices can interfere with residential uses. Some local crops, such as parsnips, carry risk of skin irritation on contact and must be secured from nearby residential areas. Conversely, the urbanizing an area could have negative impacts on existing agricultural uses and crop yields through increased traffic, conflicts with water availability and delivery, flooding, introduction of weeds or pests, damage to crops or livestock, trespassing, litter (including harmful pet waste), and vandalism.

The agricultural and forest compatibility analysis is an additional guide for decision makers in determining the best area(s) for UGB expansion, though all subareas are considered high value farmland. Existing agricultural uses and crops are illustrated in Figure 19 and Table 30summarizes subareas 2-10 relative to agricultural compatibility.

Figure 19. Goal 14 Location Factor 4 – Agricultural and Forest Uses

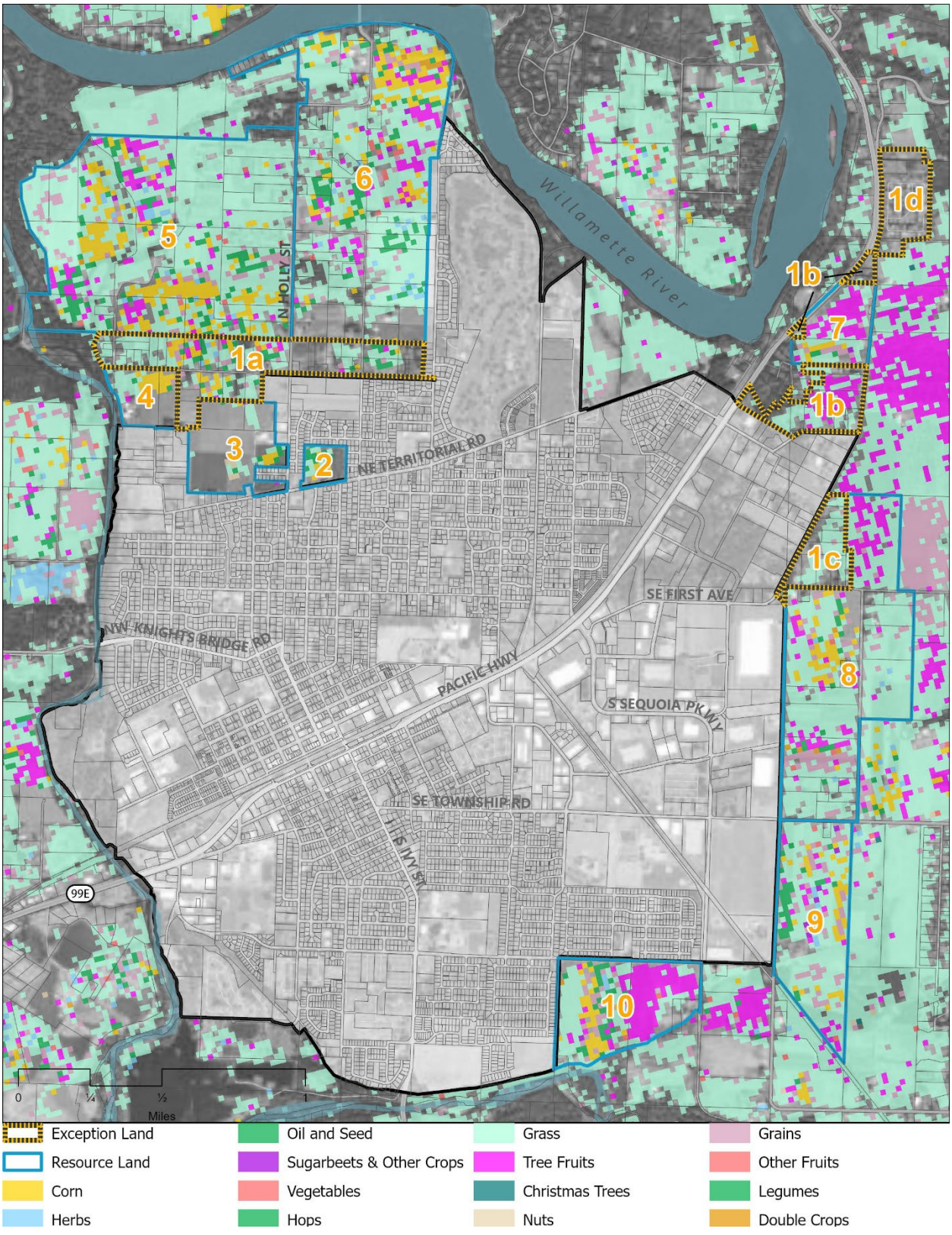


Table 30. Goal 14 Location Factor 4

Subareas	Evaluation/Comments
2	The compatibility consequences of expanding the UGB to subarea 2 for residential are generally positive overall. • Surrounded by residential development and does not impact agricultural uses.
3	The consequences of expanding the UGB to subarea 3 for residential are generally positive overall. • Surrounded on three sides by existing residential development. • Bordered on the north by existing agricultural uses in subarea 1a, which is exception land prioritized for residential development.
4	The consequences of expanding the UGB to subarea 4 for residential or industrial uses are negative overall. • Home of Swan Island Dahlias, this subarea borders Molalla River State Park to the west. • Borders subarea 1a (exception land) to the east. • Adjacent to residential uses within the existing UGB to the south. • Subarea 5 to the north with primarily agricultural uses. Subarea 5 contains significant Goal 5 constraints and currently grows turnips, rutabagas, parsnip, rhubarb, green beans, radishes, corn, other vegetables, and grasses.
5	The consequences of expanding the UGB to subarea 5 for residential or industrial uses are negative overall. • Not adjacent to residential or industrial development. • Borders the Molalla River State Park on the west and the Willamette Riverfront to the north. • Adjacent to Swan Island Dahlias to the south. • Development could impact existing agricultural uses in subarea 6 to the east. Portions of subarea 6 contain hydric soil, and the area is primarily agricultural when the soil is dry.
6	The consequences of expanding the UGB to subarea 6 for residential uses are positive overall, but the consequences of expanding the UGB for industrial uses are negative. • Adjacent to Willamette Valley Country Club's golf course to the east. • Borders subarea 1a (exception land) to the south, which is currently a mix of residential and agricultural uses. • Willamette Riverfront runs across the northern border of this subarea. • Subarea 5 to the north with primarily agricultural uses. Subarea 5 contains significant Goal 5 constraints and currently grows turnips, rutabagas, parsnip, rhubarb, green beans, radishes, corn, other vegetables, and grasses.
7	The consequences of expanding the UGB to subarea 7 for residential or industrial uses are neutral. • Adjacent to farmland to the east that is not currently being considered for development and containing primarily fruit trees and grasses. • Separated from agricultural uses by Haines Road. • Near some rural residential development to the north and south in subarea 1b. • Abuts Willamette Riverfront to the west.
8	The consequences of expanding the UGB for future development in subarea 8 are primarily positive for industrial uses. • Adjacent along the western border to industrial development within the existing UGB. • Borders agricultural uses, primarily grassland with some fruit trees, along the east. • Southern portion of the eastern boundary is defined by S Blount Road which separates it from agricultural uses. • Subarea 9 sits to the south with existing agricultural uses, primarily grasses, grains, and hops. • Subarea 1c is to the north with a mix of residential uses and grass farms.

Subareas	Evaluation/Comments
9	The consequences of expanding the UGB for future development in subarea 9 are primarily positive for industrial uses. • Runs along the existing UGB with industrial, residential development, and some grass farming to the west. • Borders subarea 8 to the north with existing farming. • Adjacent to farming to the east, which is predominantly devoted to grass, and 100-year floodplain to the south.
10	The consequences of expanding the UGB for future development in subarea 10 are positive for residential or industrial uses. • Adjacent to residential development, farm uses (fruit trees and grasses), and the Canby Rod & Gun Club.

Findings

Subareas 2 and 3 have the least amount of nearby agricultural land. All other subareas carry some level of potential for conflict, with adjacent farming uses, mostly grass (pasture, sod, and seed), fruit trees, and vegetable and flower farming.

Increased residential development could create transportation conflicts with farming equipment being hauled slowly on existing roads accessible to those in Subareas 5 and 6.

Industrial development in subareas 8 and 9 have the least amount of impact on agriculture and forest land, with lengthy borders along existing industrial uses to the west, some road separation from agricultural uses to the east, and the agricultural land being primarily grass land with sufficient transportation access for farm equipment.

6. UGB Amendment Recommendation

This section makes recommendations about how the City should accommodate its future land need through a UGB expansion. The 538.0-acre land need includes 73.1 acres of residential land need, 25.7 acres of park land need, and 439.2 acres of employment land need. State law requires Canby to accommodate the entire residential land need. The City has the option of accommodating all or part of the park land need and employment land need.

The City is not required to assign land uses to the UGB expansion recommendation. However, discussing potential land uses is helpful in determining the location of the UGB amendment. The recommendation is illustrated in Figure 20 and a summary is provided in Table 31.

Urban Growth Boundary Amendment Recommendation

First Priority: Exception Lands

Subareas 1a, 1b, 1c, and 1d are the first priority for adding to the Canby UGB. The City recommends the following for each first priority subarea.

Subarea 1a
Located in the northwest portion of the Study Area, the 115.9 unconstrained acres in Subarea 1a are more than enough land to accommodate the entire 73.1 acres of residential need and 25.7 acres of park land. The City will need to decide how many acres of park need will be accommodated in this subarea. Any remaining lands will be left out of the Canby UGB as the area is unsuitable for employment uses.

Recommendation: Add 73.1 acres from Subarea 1a to the UGB to accommodate the entire residential land deficit.

Recommendation: Add 25.7 acres of park land from Subarea 1a to the UGB to accommodate some or all of the park land deficit.

Subarea 1b
Since the City's entire residential need is accommodated in Subarea 1a, the 50.0 acres in Subarea 1b will need to be brought in as employment lands.

Recommendation: Add the 50.0 acres (42.3 unconstrained acres) in Subarea 1b to the UGB to accommodate a portion of the employment land deficit. This area could also include parks.

Subareas 1c
Since the City's entire residential need is accommodated in Subarea 1a, the 34.3 unconstrained acres in Subarea 1b will need to be brought in as employment lands.

Recommendation: Add the 34.3 unconstrained acres in Subareas 1c to accommodate a portion of the employment land deficit. This area could also include parks.

Subarea 1d
The 39.0 acres in Subarea 1d are not ready for efficient urban development. The subarea contains a manufactured home park, cemetery, and historic structure, leaving very little buildable land. Connectivity to transportation infrastructure to the southwest is limited by the need for significant urban upgrades along Haines Road and at the OR 99E intersection with Haines Road. Existing infrastructure is not suitable for more intensive development and would require utility extensions.

Recommendation: Do not add any land from Subarea 1d into the Canby UGB.

Fourth Priority: High Value Farmland

The following subareas are candidates to accommodate some or all of the employment land need 439.2 acres. The City recommends the following for each fourth priority subarea.

Subarea 2
Located entirely within city limits, the 13.0 unconstrained acres in Subarea 2 are appropriate for residential development. The subarea has the potential to tie into existing Canby transportation, water, sewer, and stormwater infrastructure. Residential development in Subarea 2 would promote good urban form and the parcels that surround it have been developed as residential subdivisions. However, the City's entire residential land need can be accommodated on first priority lands.

It is possible for the City to add Subarea 2 to the UGB through a Goal 3, 11, and 14 irrevocably committed exception process. An "irrevocably committed" exception does not require demonstration of land need; instead, it can be added to the UGB because it is irrevocably committed to urban uses. OAR 660-004-0028 contains criteria for this type of exception.

If the City uses a goal exception to add this subarea before or at the same time as the larger UGB amendment, the UGB expansion report would need to factor in the 13 acres of land provided here, reducing the land needed in other subareas.

Recommendation: Do not add any land from Subarea 2 into the Canby UGB.

Subarea 3

Surrounded on three sides by Canby city limits and adjacent to residential development, the 60.8 unconstrained acres in Subarea 3 are appropriate for residential development. It has the potential to tie into the existing transportation, water, sewer, and stormwater infrastructure, with some transportation connectivity limitations to the south. However, the City's entire residential land need can be accommodated on first priority lands.

Subarea 3 is located between the existing UGB and part of subarea 1a. The City could rely on OAR 660-024-0067(3)(a) regarding the inclusion of "small" priority 4 areas in a UGB:

> *(3) Notwithstanding section (2)(c) or (d) of this rule, land that would otherwise be excluded from a UGB may be included if:*
>
> *(a) The land contains a small amount of third or fourth priority land that is not important to the commercial agricultural enterprise in the area and the land must be included in the UGB to connect a nearby and significantly larger area of land of higher priority for inclusion within the UGB; or*

Subarea 1a lies north of the Holly Street Development Concept Plan Area boundary and appears to be serviceable by sewer and water line extensions in the Holly Street right of way, which is already inside the UGB. If the City can demonstrate that parts of Subarea 3 are needed to connect to parts of Subarea 1a due to the need for efficient development patterns and infrastructure extensions, a portion of subarea 3 could be added to the UGB.

However, given the City's plans for utilities in Holly Street extending up to 22nd Avenue, as described in the Holly Street Development Concept Plan, this may not be possible.

If all of Subarea 1a is added to the UGB, Subarea 3 would become a "hole" in the UGB. In future UGB amendments, it is likely that subarea 3 would be added to the UGB either through a goal exception or because it will be highly suitable based on a Goal 14 analysis.

If the City uses a goal exception to add this subarea before or at the same time as the larger UGB amendment, the UGB expansion report would need to factor in the 61 acres of land provided here, reducing the land needed in other subareas.

Recommendation: Do not add any land from Subarea 3 into the Canby UGB.

Subarea 4
Subarea 4 (27.8 acres) is home to Swan Island Dahlia Farm, which is an important social, cultural, and economic institution in Canby with farm and commercial operations. It requires more urban standard roadway upgrades in the existing UGB to provide accessible, safe, and convenient multimodal access to essential destinations in the established portion of Canby. It does not have good access to existing infrastructure.

Recommendation: Do not add any land from Subarea 4 into the Canby UGB.

Subarea 5
Of the 392.5 acres in Subarea 5, 206.3 acres are unconstrained and appropriate for residential development, but it is not currently ready for efficient residential development since the subarea is not adjacent to Canby's UGB. It has potential to connect into the existing Canby transportation infrastructure, but not as well as Subareas 2 or 3 as more urban standard roadway upgrades would be required. It does not have good access to existing infrastructure. In addition, the City's entire residential land need can be accommodated on first priority lands.

Recommendation: Do not add any land from Subarea 5 into the Canby UGB.

Subarea 6
292.9 of the 345.8 acres in Subarea 6 are unconstrained and appropriate for residential development. The eastern portion of the subarea abuts Canby city limits and is adjacent to residential development so it would promote good urban form. It has good potential to tie into existing transportation infrastructure with multiple north-south travel routes but would require urban standard roadway upgrades. It has access to water, sewer, and stormwater infrastructure. However, the City's entire residential land need can be accommodated on first priority lands.

Recommendation: Do not add any land from Subarea 6 into the Canby UGB.

Subarea 7
Subarea 7 is 40.5 acres and includes 38.7 acres are unconstrained and appropriate for industrial development. It does not currently abut city limits but is surrounded by exception land (Subarea 1b) that will be brought into the UGB for employment uses as described above. Connectivity to established infrastructure in the existing UGB to the southwest is limited by the need for significant urban upgrades along Haines Road and at the OR 99E intersection with Haines Road. It will require utility extensions through Subarea 1b for water and sewer infrastructure.

Recommendation: Add Subarea 7 (40.5 acres) to the UGB, including 38.7 unconstrained acres to accommodate a portion of the employment land deficit. This area could also include parks.

Subarea 8
213.5 of the 227.9 acres in Subarea 8 are unconstrained and appropriate for industrial development. 14.5 acres are constrained by a historic landmark and land with slopes greater than 10%. The western boundary of Subarea 8 abuts city limits and northern boundary abuts Subarea 1c. It is adjacent to industrial development and farm uses. Subarea 8 has strong

regional mobility potential due to its proximity to nearby arterial and collector roadways, and multiple connections to OR 99E. Subarea 8 has access to existing or planned water and sewer services, but there is no existing stormwater infrastructure.

Recommendation: Add Subarea 8 (227.9 acres) to the UGB, including 213.5 unconstrained acres to accommodate a portion of the employment land deficit. This area could also include parks.

Subarea 9

Of the 112.0 acres in Subarea 9, 68.0 are unconstrained and appropriate for industrial development. 43.1 acres fall within a Goal 5 stream buffer and the 100-year floodplain. The western boundary of Subarea 9 abuts city limits. It is adjacent to industrial development and farm uses. Subarea 9 has strong regional mobility potential due to its proximity to nearby arterial and collector roadways, and multiple connections to OR 99E. Subarea 9 has access to existing or planned water and sewer services, but there is no existing stormwater infrastructure.

Recommendation: Add 60.8 acres of Subarea 9 to the UGB to accommodate a portion of the employment land deficit. This area could also include parks.

Subarea 10

Subarea 10 has 94.8 unconstrained acres that are appropriate for residential or industrial development and ready for efficient urban development as it abuts Canby city limits to the north and west. It has strong potential to tie into transportation infrastructure with limited urban upgrades. The subarea has existing or planned water, sewer, and stormwater infrastructure. It's adjacent to residential development, farm uses, and the Canby Rod & Gun Club property.

Recommendation: Do not add any land from Subarea 10 into the Canby UGB at this time as it may be more appropriate for future residential use.

Table 32. UGB Expansion Recommendation by Subarea

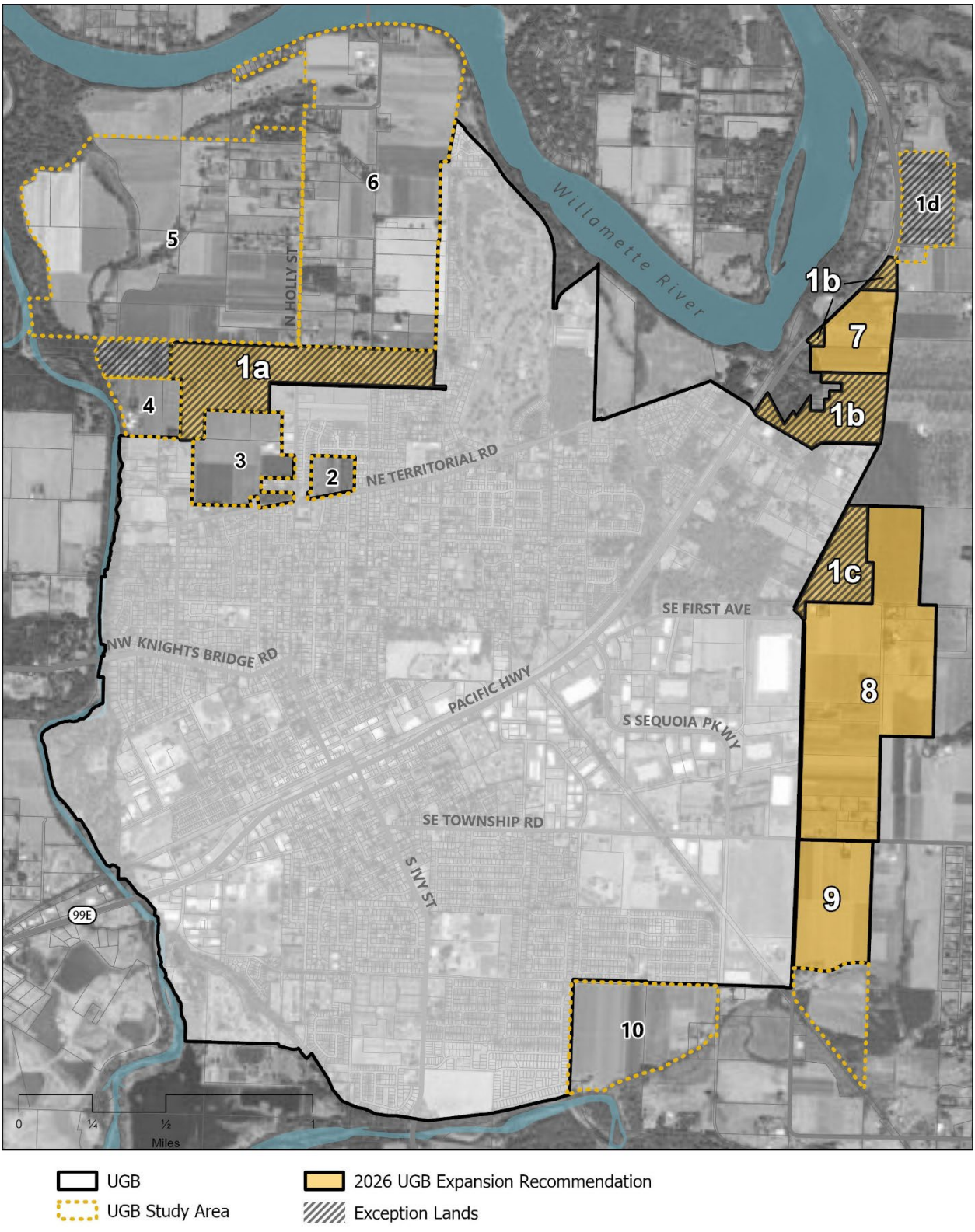
Subarea	Gross Acres	Gross UGB Acres	Unconstrained Residential Acres	Unconstrained Park Acres	Unconstrained Employment Acres	Total Unconstrained Acres
1a	115.9	98.8	73.1	25.7		98.8
1b	50.0	50.0			42.3	42.3
1c	34.3	34.3			34.3	34.3
1d	39.0					
2	13.0					
3	60.8					
4	27.8					
5	392.5					
6	345.8					
7	40.5	40.5			38.7	38.7
8	227.9	227.9			213.5	213.5
9	112.0	60.8			60.8	60.8
10	95.9					
TOTAL	**1,555.4**	**512.3**	**73.1**	**25.7**	**389.6**	**488.4**

As shown in Table 33, the Canby UGB Expansion Recommendation contains 488.4 unconstrained acres, including 73.1 acres for residential needs, 25.7 acres for park needs, and 389.6 acres for employment needs. The 488.4-acre total of unconstrained land is 23.9 acres less than the identified land need. The 413.5 gross acres of employment (industrial) area is 25.7 acres (49.6 unconstrained acres) less than the employment land need.

Table 33. UGB Expansion Recommendation by Subarea

Land Use	Land Need	UGB Expansion Recommendation	
		Gross Acres	Unconstrained Acres
Residential	73.1 acres	73.1 acres	73.1 acres
Parks	25.7 acres	25.7 acres	25.7 acres
Employment	439.2 acres	413.5 acres	389.6 acres
TOTAL	**538.0 acres**	**512.3 acres**	**488.4 acres**

Figure 20. Urban Growth Boundary Expansion Recommendation



Appendix A. 1992 Clackamas County - City of Canby Urban Growth Management Agreement (UGMA)

CLACKAMAS COUNTY - CITY OF CANBY

URBAN GROWTH MANAGEMENT AGREEMENT

Whereas, the City of Canby and Clackamas County have a mutual interest in coordinated comprehensive plans, compatible land uses and coordinated planning of urban public facilities; and

Whereas, the City and the County will make a good faith effort to reconcile any differences that may emerge from the above mutual interest; and

Whereas, information exchanges should concentrate on issues that may have a significant impact on either party and should not entail cumbersome procedural requirements that may increase the time necessary to expedite decision-making; and

Whereas, OAR 660-03-010 requires management of unincorporated areas within an urban growth boundary to be set forth in a statement submitted to the Land Conservation and Development Commission (LCDC) at the time of acknowledgment request; and

Whereas, OAR 660-11-015 requires the responsibility for the preparation, adoption and amendment of the public facility plan to be specified within the urban growth management agreement; and

Whereas, Statewide Planning Goal 2 requires coordination between City and County in comprehensive planning,

NOW, THEREFORE, THE CITY AND COUNTY AGREE AS FOLLOWS:

1. **Boundary**

   A. The Urban Growth Boundary Management Boundary (UGMB) shall include unincorporated land within the Urban Growth Boundary (UGB) and adjacent to the City, as shown on map Attachment "A" to this agreement.

2. **Comprehensive Planning, Plan Amendments and Public Facilities Planning for Lands in Unincorporated UGMB**

   A. The development of a Comprehensive Plan and Comprehensive Plan changes for the unincorporated areas within the UGMB shall be a coordinated City-County planning effort. The City shall be responsible for preparing all legislative Comprehensive Plan amendments in the UGMB. The County shall adopt the City land use plan designations for all unincorporated lands within the UGMB.

All quasi-judicial comprehensive plan amendments for lands within the unincorporated UGMB shall be approved by the City prior to County adoption.

B. City shall be responsible for the preparation, adoption, and amendment of the public facilities plan within the UGMB required by OAR Chapter 660, Division II, Public Facilities Planning. Preparation and amendment of such public facilities plan shall provide for coordination with and participation by the County, County Service and any other special districts within the UGMB which may exist.

C. The City will be exploring whether there is a need for an Urban Reserve Area adjacent to the Canby UGMB and need for public facility planning for such area. This effort will be coordinated with the County.

3. **Development Proposals for Unincorporated UGMB Areas**

A. The County's zoning shall apply to all unincorporated lands within the UGMB. The County shall zone all unincorporated lands within the UGMB to Future Urbanizable (FU-10), Agriculture or Forest. The current zoning categories include EFU-20, RRFF-5, and GAD, which may require some modification in the future to an appropriate category such as FU-10. With provisions for City input, the County shall retain responsibility and authority for all implementing regulations and land use actions for all unincorporated lands within the UGMB unless the City and County execute a separate agreement for specific areas within the UGMB.

B. The provision of public facilities and services shall be consistent with the adopted public facility plan for the unincorporated UGMB. For areas zoned FU-10 within the UGMB, the County shall issue no permit or otherwise authorize extension or connection of public facilities and services in violation of the FU-10 Zone.

C. The County shall not form any new County Service Districts or support the annexation of land within the unincorporated UGMB to such districts or to other service districts without City approval.

4. **County Notice to and Coordination with the City**

A. The County shall provide notification to the City at least thirty-five (35) days prior to the first scheduled public hearing on all land use actions, quasi-judicial actions, proposed legislative changes to the County Comprehensive Plan or its implementing ordinances affecting land within the UGMB.

B. The County shall provide notification to the City at least fifteen (15) days prior to staff decision on applications for administrative actions as provided for in the County's Zoning and Development Ordinance for applications within the UGMB.

C. The County shall notify and invite City staff to participate in pre-application meetings on significant development proposals or Design Review Committee meetings on development proposals within unincorporated areas of the UGMB.

These meetings shall be set by the County after consultation with City staff on a mutually agreeable meeting time. All meetings shall occur within thirty (30) days from the date the city is contacted unless agreed otherwise.

D. Any amendments proposed by the County to the UGB, as shown on Attachment "A", will be jointly reviewed by the City and the County prior to submission to the State (DLCD).

E. The County shall enter all written comments of the City into the public record and shall consider the same in the exercise of its planning and plan implementation responsibilities.

5. **City Notice to and Coordination with the County**

A. The City shall provide notification to the County at least twenty (20) days prior to the first public hearing on all proposed annexations, capital improvement plans or extraterritorial service extension into unincorporated areas.

B. The City shall provide notification to the County at least twenty (20) days prior to the first public hearing on all land use actions, proposed legislative changes to the City Comprehensive Plan or quasi-judicial actions adjacent to or in close proximity to unincorporated areas.

C. Any amendments proposed by the City to the UGB, as shown on Attachment "A", will be jointly reviewed by the City and the County prior to submission to the State (DLCD).

6. **City Annexations and Sewer, Water and Road Service**

A. The City may undertake annexations in the manner provided for by law within the UGMB. City annexation proposals shall include adjacent road right-of-way to properties proposed for annexation. The County shall not oppose such annexations.

B. For newly annexed areas, upon annexation, the City shall assume jurisdiction of County roads and local access roads except arterials that are within or abutting the area annexed.

As a condition of jurisdiction transfer for County roads and local access roads not built to City street standards on the date of the final decision on the annexation, the County agrees to pay to the City a sum of money equal to the cost of a two (2") inch asphaltic concrete overlay over the width of the then-existing pavement; however, if the width of pavement is less than twenty (20') feet, the sum shall be calculated for an overlay twenty (20') feet wide. The cost of asphaltic concrete overlay to be used in the calculation shall be the average of the most current asphaltic concrete overlay projects performed by each of the City and County. In the case of a large area, annexation or multiple annexations, within a one (1) year period, the County may spread payment to the City over several years not to exceed five (5) years. Arterial roads will be considered for transfer on a case-by-case basis. Terms of transfer for arterial roads will be negotiated and agreed to by both jurisdictions. The above described provisions are not intended to prevent alternative arrangements where mutually agreed to by the City and County.

C. If the City adopts a Transportation System Development Charge (SDC) and if the SDC is to be used by the City in conjunction with annexation, or where annexation occurs through delayed annexation, the parties will renegotiate this agreement particularly regarding County payment to the City for roads specified in 5B above.

D. The provision of public facilities and services shall be consistent with the adopted public facility plan for the unincorporated UGMB. For areas zoned FU-10 within the UGMB, the County shall issue no permit or otherwise authorize extension or connection of public facilities and services in violation of the FU-10 Zone.

E. The City shall not extend sewers or water to any unincorporated areas within the UGMB without annexation to the City, or unless mutually agreed to otherwise by the City and County.

F. City and County planning officials shall attempt to informally resolve any disputes regarding either party's performance or decisions under this agreement, or regarding the terms, conditions or meaning of this agreement. Disputes which are not resolved through this informal process shall be resolved by participation in the dispute resolution process administered by the Department of Land Conservation and Development (DLCD). Either party may request participation in the dispute resolution process upon ten (10) days prior written notice. DLCD shall conduct the dispute resolution process in accordance with its established process or the future provisions of any such process. Any and all cost of dispute resolution shall be assessed equally to both parties.

7. **Terms of Agreement**

It is hereby understood that this agreement may be amended in writing by the concurrence of both the City and County. Either party may terminate this agreement at any time after one-hundred twenty (120) days written notice to the other party.

IN WITNESS WHEREFORE, the respective parties have caused to be signed in their behalf to make and enter into this agreement this 4th day of November, 1992.

CITY OF CANBY

By Shawn Farrell

ATTEST:

By Marilyn K. Reber

CLACKAMAS COUNTY
BOARD OF COMMISSIONERS

By Judie Hammerstad

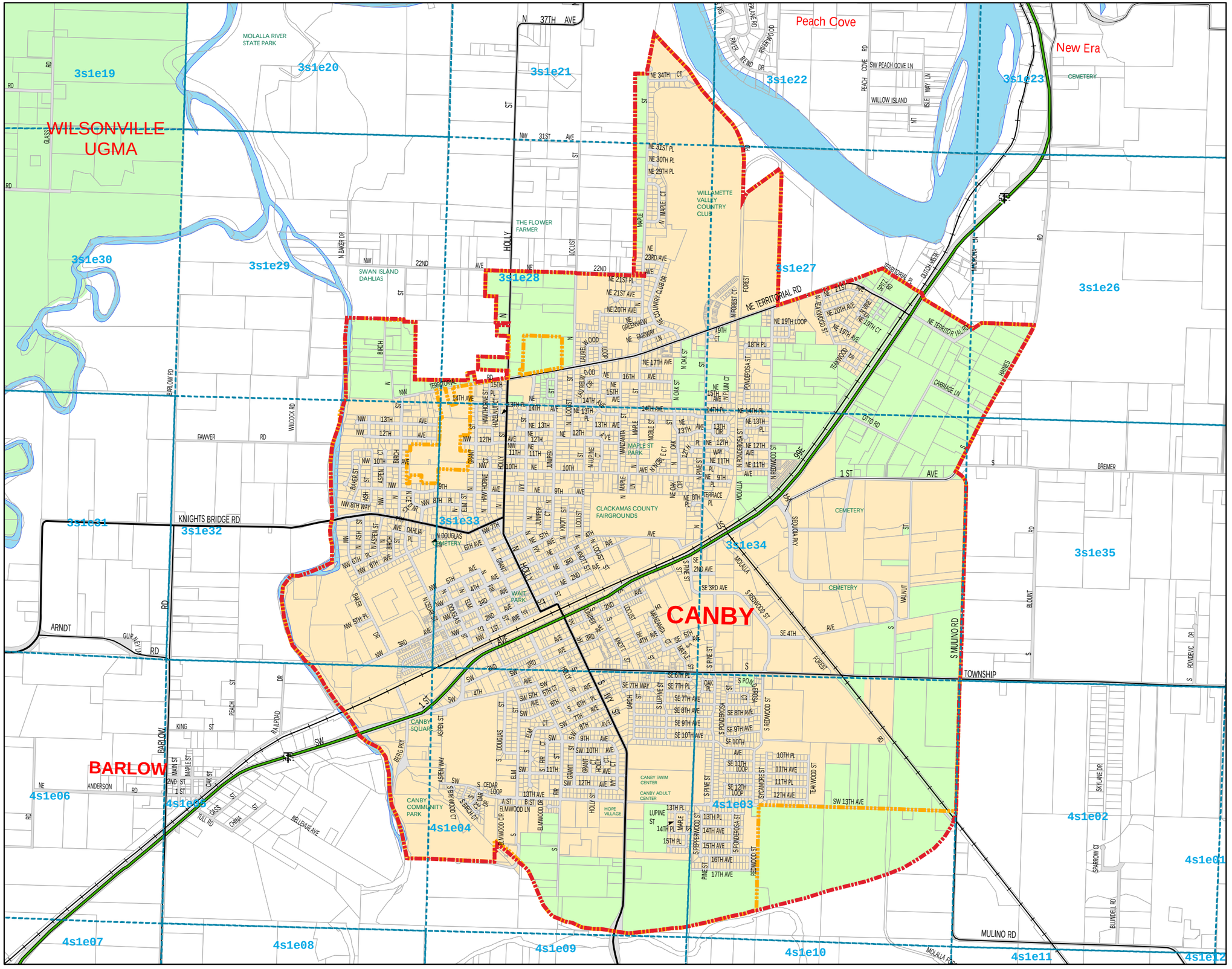
By Darlene Hooley

By

ugma.agt\102692

CANBY

Urban Growth Management Area



Legend

- UGMA
- UGB
- Canby
- Unincorporated Clackamas County within the UGMA

October 2005

1:22,000

CLACKAMAS COUNTY

GEOGRAPHIC INFORMATION SYSTEMS

DEPARTMENT OF TRANSPORTATION & DEVELOPMENT
9101 SE SUNNYBROOK BLVD
CLACKAMAS,OR 97015

The information on this map was derived from digital databases from Clackamas County's GIS. Care was taken in the creation of this map but is provided "as is". Clackamas County cannot accept any responsibility for any errors, omissions, or positional accuracy, and therefore, there are no warranties which accompany this product. Although information from Land Surveys may have been used in the creation of this product, in no way does this product represent or constitute a Land Survey. Users are cautioned to field verify information on this product before making any decisions.

DTD | R.GRAY | PLANNING/UGMA | CANBYUGMA.MXD | Oct 2005

April 29, 2024

CURRAN-McLEOD, INC.
CONSULTING ENGINEERS
6655 S.W. HAMPTON STREET, SUITE 210
PORTLAND, OREGON 97223

Mr. Don Hardy
Planning Director
City of Canby
222 NE 2nd Avenue
Canby, OR 97013

RE: CANBY URBAN GROWTH BOUNDARY EXPANSION
MADRONA LANE SITE EVALUATION

Dear Don:

This correspondence is to aid in evaluating the option to expand the Urban Growth Boundary to include the area served by East Madrona Lane, northeast of the current UGB, including tax lots:

31E26: 1401, 1501, 1502, 1601 and 1603
31E27DA: 100, 102
31E27AD: 300, 400, 500, 501, 600, 700, 800, and 900

This area abuts the state highway and is essentially fully developed with single family residences on large lots. The area is predominately an uprising of rock, rising to approximately 250-foot elevation, which is generally 100 feet above the City of Canby average elevation.

The USDA Natural Resources Conservation Service (NRCS) names the soils in this isolated area as Xerochrepts-Rock Outcrop Complex, which has rock well dispersed throughout the entire area. The typical soil profile shows un-weathered bedrock is found from 26" to 30" below grade.

The area has14single family homes on the fifteen lots listed above, with the lot size varying from 0.24 acres to 3.51 acres. The average lot size is less than one acre. Much of the land is very steep and the potential for added development is very low. The homes are generally high value with mature landscaping. Any redevelopment would require extensive disruption to the existing improvements, and only a few buildable lots could be created.

There is an existing 30-foot public right-of-way providing access from Highway 99E to Madrona Lane from the north; however, it is not developed to meet City or County public road standards. The current roadway varies from 20 feet wide at the highway entrance point and reduces to approximately 12-14 feet wide at the south end. The roadway slope is reasonable and would likely follow City code standards.

Canby development codes would require a public roadway 28' to 34' public street depending on the number of developed residential units, an 8" gravity sanitary sewer, and an 8" waterline. The access could be a private road to these ten lots, but the code would require the private roadway to be a minimum of 22 feet wide.

Regardless of public or private, with any street improvement it would be a challenge to provide safe access to the high-speed traffic on Highway 99E. An alternative access route southeast of the hillside is also unlikely due to the steep slopes and existing development in the area. An alternative route would be blocked by existing development and require several ROW easements.

Sanitary sewer could be provided by gravity to the anticipated Haines Road / SE 1st Avenue sewer or the existing Territorial Road sanitary sewer. However, construction costs to extend these lines to the residents would be extremely high due to rock excavation, steep slopes, many required easements, and the disruption to landscaping.

Due to the 250' elevation, water service would only marginally be available from the pressures available in the current distribution system. The current system can only support development to approximately 240' to 250' with minimal pressures. Canby Utility could consider creating a new higher-pressure zone, or a separate jockey-pumped system could be provided to adequately serve the homes. If fire protection is required, the pump station would also be required to have a fire rated system with auxiliary power supply, resulting in very high costs.

Stormwater is the only utility that can easily be accommodated in any potential development plan for this area. The soil has high percolations rates, and the steep slopes would rapidly dispose of any stormwater.

In an overview, if the City is evaluating various sites to expand the UGB to provide increased housing capacity, the addition of the E Madrona Lane area would be a poor selection. It is not feasible to develop this area to comply with the maximum 10,000 square foot lot code requirement, and only a very few additional home sites would be created due to the existing development pattern and unbuildable steep slopes.

Providing the required infrastructure could be done, but at significantly higher cost than any other area in consideration. The infrastructure cost per new lot would exceed the value of the lots.

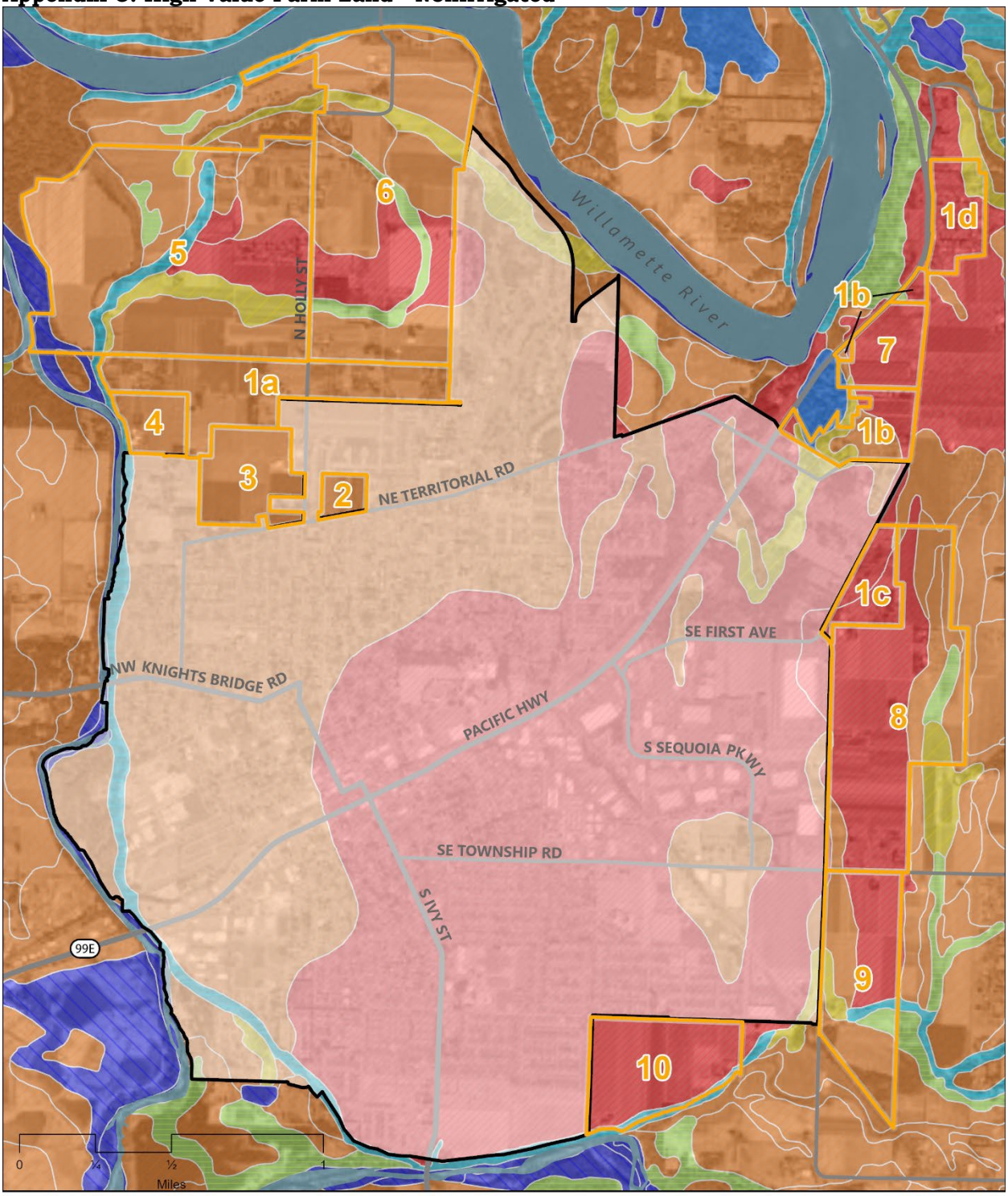
Let know if you have questions.

Very truly yours,

CURRAN-McLEOD, INC.

Curt J. McLeod, PE
City Engineer of Record

Appendix C. High Value Farm Land - Nonirrigated



Capability Class

Capability classes are designated by the numbers 1 through 8. The numbers indicate progressively greater limitations and narrower choices for development.

The classes are defined as follows:

- **Class 1** soils have few limitations that restrict their use.
- **Class 2** soils have moderate limitations that reduce the choice of plants or that require moderate conservation practices.
- **Class 3** soils have severe limitations that reduce the choice of plants or that require special conservation practices, or both.
- **Class 4** soils have very severe limitations that reduce the choice of plants or that require very careful management, or both.
- **Class 5** soils are subject to little or no erosion but have other limitations, impractical to remove, that restrict their use mainly to pasture, rangeland, forestland, or wildlife habitat.
- **Class 6** soils have severe limitations that make them generally unsuitable for cultivation and that restrict their use mainly to pasture, rangeland, forestland, or wildlife habitat.
- **Class 7** soils have very severe limitations that make them unsuitable for cultivation and that restrict their use mainly to grazing, forestland, or wildlife habitat.
- **Class 8** soils and miscellaneous areas have limitations that preclude commercial plant production and that restrict their use to recreational purposes, wildlife habitat, watershed, or aesthetic purpose.



Taxlot Info

TLID	OWNERSORT	OWNER1	SITEADDR	SITECITY	SITEZIP	Subarea
31E28A 00300	FELLE	FELLER JEFFREY A	625 NE 22ND AVE	CANBY	97013	1a
31E28A 00301	MAST	MAST KYLE R & HANNAH L	575 NE 22ND AVE	CANBY	97013	1a
31E28A 00302	VAUGH	VAUGHAN BRIAN A & ANNETTE T	NO SITUS	CANBY	97013	1a
31E28A 00400	ROBER	ROBERTS TODD E TRUSTEE	2327 N MAPLE ST	CANBY	97013	1a
31E28A 00500	ALBRI	ALBRICH JERALD CO-TRUSTEE	2389 N MAPLE ST	CANBY	97013	1a
31E28A 00501	VAUGH	VAUGHAN BRIAN A & ANNETTE T	609 NE 22ND AVE	CANBY	97013	1a
31E28A 01500	MONTE	MONTECUCCO R FRANCES CO-TRUSTEE	2366 N LOCUST ST	CANBY	97013	1a
31E28A 01600	IRWIN	IRWIN ARBIE G CO-TRUSTEE	2236 N LOCUST ST	CANBY	97013	1a
31E28B 00700	SIMNI	SIMNITT JEROME A CO-TRUSTEE	162 NE 22ND AVE	CANBY	97013	1a
31E28B 00701	SIMNI	SIMNITT JEROME A JR	168 NE 22ND AVE	CANBY	97013	1a
31E28B 00702	LOHSE	LOHSE DARLENE OPAL TRUSTEE	2393 N LOCUST ST	CANBY	97013	1a
31E28B 00703	ARENA	ARENA THOMAS	2277 N LOCUST ST	CANBY	97013	1a
31E28B 00704	SMITH	SMITH CRAIG W & CAROL A	2305 N LOCUST ST	CANBY	97013	1a
31E28B 00800	SIMNI	SIMNITT JEROME A CO-TRUSTEE	138 NE 22ND AVE	CANBY	97013	1a
31E28B 00801	SIMNI	SIMNITT JEROME A CO-TRUSTEE	138 NE 22ND AVE	CANBY	97013	1a
31E28B 00900	SIMNI	SIMNITT JEROME A CO-TRUSTEE	NO SITUS	CANBY	97013	1a
31E28B 00901	BROCK	BROCKMAN JEFFREY E TRUSTEE	120 NE 22ND AVE	CANBY	97013	1a
31E28B 01000	WEBER	WEBER LAWRENCE A TRUSTEE	2234 N HOLLY ST	CANBY	97013	1a
31E28B 01100	SIMNI	SIMNITT JEROME A CO-TRUSTEE	NO SITUS	CANBY	97013	1a
31E28B 02200	MONTE	MONTECUCCO RENTALS LLC	NO SITUS	CANBY	97013	1a
31E28B 02201	JOHNS	JOHNSON MYRTLE C	456 NW 22ND AVE	CANBY	97013	1a
31E28B 02202	ISBER	ISBERG RICHARD H TRUSTEE	480 NW 22ND AVE	CANBY	97013	1a
31E28B 02300	GITTS	GITTS NICHOLAS A TRUSTEE	466 NW 22ND AVE	CANBY	97013	1a
31E28B 02400	MORIN	MORIN STANLEY E TRUSTEE	494 NW 22ND AVE	CANBY	97013	1a
31E28B 02500	MONTE	MONTECUCCO RENTALS LLC	NO SITUS	CANBY	97013	1a
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31E28B 02700	MONTE	MONTECUCCO EDWARD TRUSTEE	716 NW 22ND AVE	CANBY	97013	1a
31E28C 01000	LOHMA	LOHMAN COREY M	387 NW 22ND AVE	CANBY	97013	1a
31E28C 01100	POLAC	POLACK KEN & SONJA	495 NW 22ND AVE	CANBY	97013	1a
31E28C 01101	IFA N	IFA NURSERIES INC	NO SITUS	CANBY	97013	1a
31E28C 01200	GITTS	GITTS NICHOLAS A TRUSTEE	627 NW 22ND AVE	CANBY	97013	1a
31E28C 01300	REEDE	REEDER DONNA M	769 NW 22ND AVE	CANBY	97013	1a
31E28C 01301	GITTS	GITTS NICHOLAS A TRUSTEE	NO SITUS	CANBY	97013	1a
31E28C 01400	DELLE	DELLER DEVIN M TRUSTEE	1914 N BIRCH ST	CANBY	97013	1a
31E29A 00800	MONTE	MONTECUCCO RENTALS LLC	NO SITUS	CANBY	97013	1a
31E26 00300	HOSTE	HOSTETLER KENNETH D	22053 S HAINES RD	CANBY	97013	1b
31E26 00400	MCLOU	MCLOUD DEAN & EMMA	22075 S HAINES RD	CANBY	97013	1b
31E26 00500	ROSE	ROSE AUSTIN & KIRSTI JOHNSON	22111 S HAINES RD	CANBY	97013	1b
31E26 00900	HASTI	HASTIE ROBERT & JANE	NO SITUS	CANBY	97013	1b
31E26 01000	MONTE	MONTECUCCO RENTALS LLC	NO SITUS	CANBY	97013	1b
31E26 01400	SCHMI	SCHMIDT CHRISTOPHER R	22353 S HAINES RD	CANBY	97013	1b
31E26 01500	HAGLE	HAGLER 2 LLC	NO SITUS	CANBY	97013	1b
31E26 01600	MOUA	MOUA KALENG K & PAVANG K	2912 SE TERRITORIAL RD	CANBY	97013	1b
31E26 01602	SCOTT	SCOTT INVESTMENTS	NO SITUS	CANBY	97013	1b
31E26 01604	KERN	KERN CHRIS J	2988 SE TERRITORIAL RD	CANBY	97013	1b
31E26 01605	WINST	WINSTON TERI L & ERIC D	22587 S HAINES RD	CANBY	97013	1b
31E26 01700	BOOTH	BOOTH EMILY L & AUSTIN J	2742 SE TERRITORIAL RD	CANBY	97013	1b
31E27DA00200	HOYER	HOYER WILLIAM J TRUSTEE	2690 SE TERRITORIAL RD	CANBY	97013	1b
31E27DA00201	SHANK	SHANK DALE RICHARD TRUSTEE	2375 E MADRONA LN	CANBY	97013	1b
31E27DA00280	HOYER	HOYER MARTA E	NO SITUS	CANBY	97013	1b
31E27DA00300	BOOTH	BOOTH EMILY L & AUSTIN J	NO SITUS	CANBY	97013	1b
31E27DA00900	INTL	INTL CH FOURSQUARE GOSPEL	2350 SE TERRITORIAL RD	CANBY	97013	1b
31E34A 02000	SMITH	SMITH-COMBS DELMAGENE E	23240 S MULINO RD	CANBY	97013	1c
31E34A 02200	SCHOS	SCHOSNIG MANFRED TRUSTEE	NO SITUS	CANBY	97013	1c
31E35 00201	SMITH	SMITH SHARON MICHELLE TRUSTEE	22840 S HAINES RD	CANBY	97013	1c
31E35 00202	THOMA	THOMAS CASEY MATTHEW & KELLIE N	22900 S HAINES RD	CANBY	97013	1c
31E35 00203	KEENE	KEENEY JUDITH D TRUSTEE	22962 S HAINES RD	CANBY	97013	1c
31E35 00204	KEENE	KEENEY ROBERT L TRUSTEE	NO SITUS	CANBY	97013	1c
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31E35 00206	COCCO	COCCO MICHAEL L & JUDY A	NO SITUS	CANBY	97013	1c
31E35 00207	LOTZ	LOTZ KAREN M	10115 S BREMER RD	CANBY	97013	1c
31E35 00208	SAVAG	SAVAGE CHELSEY LYN & COREY	10161 S BREMER RD	CANBY	97013	1c

31E35 00210	ROWEL	ROWELL RICHARD D & ANNE M	10201 S BREMER RD	CANBY	97013	1c
31E35 00212	DRIVE	DRIVER DANIEL S TRUSTEE	22992 S HAINES RD	CANBY	97013	1c
31E35 00213	STEVE	STEVENS WILLIAM E & CARLA A	10211 S BREMER RD	CANBY	97013	1c
31E35 00300	COCCO	COCCO MICHAEL L & JUDY A	23116 S HAINES RD	CANBY	97013	1c
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31E26 01100	BIRKE	BIRKEMEIER FARMS INC	22200 S HAINES RD	CANBY	97013	7
31E26 01200	BIRKE	BIRKEMEIER RICHARD E CO-TRUSTEE	NO SITUS	CANBY	97013	7
31E26 01300	MONTE	MONTECUCCO PAUL A TRUSTEE	22345 S HAINES RD	CANBY	97013	7
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31E35 00400	SCHOS	SCHOSNIG MANFRED A TRUSTEE	10076 S BREMER RD	CANBY	97013	8
31E35 00500	SCHOS	SCHOSNIG FAMILY LIV TRST	10050 S BREMER RD	CANBY	97013	8
31E35 00600	NEWKI	NEWKIRK HEIDI	23453 S BLOUNT RD	CANBY	97013	8
31E35 00700	MANUE	MANUEL FAMILY LAND LLC	NO SITUS	CANBY	97013	8
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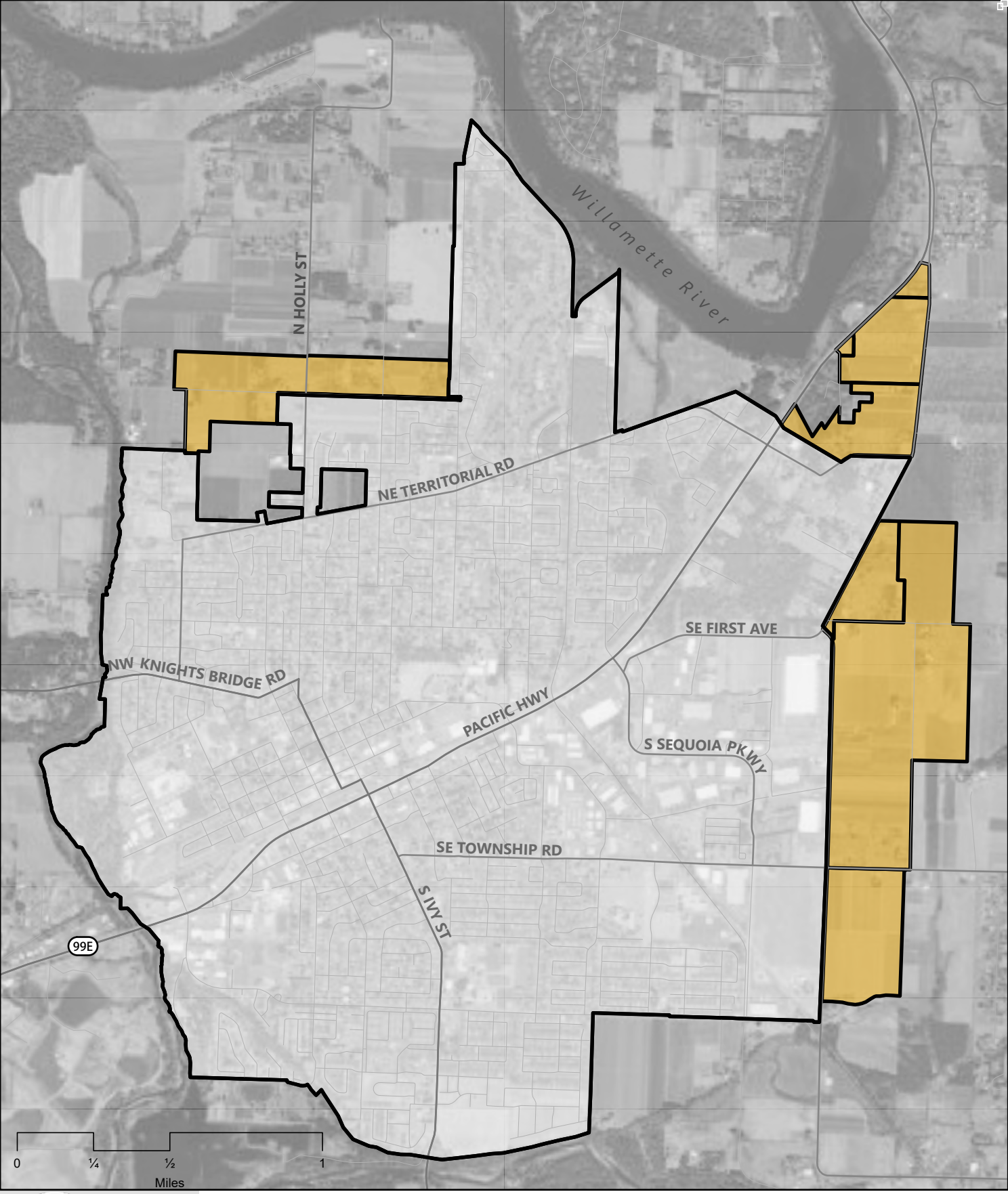
31E35 00800	MULIN	MULINO ROAD PROPERTY LLC	23840 S MULINO RD	CANBY	97013	8
31E35 00801	GUSTA	GUSTAFSON TIMOTHY S	23885 S BLOUNT RD	CANBY	97013	8
31E35 00802	WILTS	WILTSHIRE LYNN R	23869 S BLOUNT RD	CANBY	97013	8
31E35 00803	DEMET	DEMETZ KATERINA C	23855 S BLOUNT RD	CANBY	97013	8
31E35 00900	WEEDM	WEEDMAN KIRK A & CATHY M	10049 S TOWNSHIP RD	CANBY	97013	8
31E35 01000	DRAGT	DRAGT JON D & BRENDA M GUNDERSEN	23951 S BLOUNT RD	CANBY	97013	8
31E35 01001	COLLI	COLLINSON SEAN D & JULIE L	23905 S BLOUNT RD	CANBY	97013	8
31E35 01002	COLLI	COLLINSON SEAN D & JULIE L	NO SITUS	CANBY	97013	8
31E35 01200	SNOOK	SNOOK BARRY D TRUSTEE	NO SITUS	CANBY	97013	8
31E35 01202	SNOOK	SNOOK BARRY D TRUSTEE	23338 S BLOUNT RD	CANBY	97013	8
31E35 01300	SNOOK	SNOOK BARRY D TRUSTEE	23300 S BLOUNT RD	CANBY	97013	8
31E35 01301	KORSN	KORSNESS OLIVER B TRUSTEE	10420 S BREMER RD	CANBY	97013	8
31E35 01400	FAST	FAST ERIC & SARAH	23240 S BLOUNT RD	CANBY	97013	8
41E02 00600	WEBBE	WEBBER SUZANNE C TRUSTEE	24464 S MULINO RD	CANBY	97013	9
41E02 00601	ROSS	ROSS KATTERRINA R G & M J G	10182 S TOWNSHIP RD	CANBY	97013	9



Cultivating CANBY
Planning with Possibility

City of Canby, OR

UGB Submittal - Sep 2026

Canby 2026 Urban Growth Boundary (UGB)

2026 UGB Expansion Recommendation

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

August 19, 2026

City of Canby
Don Hardy, Community Development Director

Sent via email

RE**:** Required Timeline and Applicable Rules for Canby's UGB amendment

Dear Director Hardy,

The Department of Land Conservation and Development (DLCD, or the Department) has received the notice of upcoming hearings for a UGB amendment greater than 50 acres from the City of Canby, which will fulfill the City's approved Sequential UGB work program. This letter explains the applicable rule sets, the role of Clackamas County, the meaning of "submit," and the deadline for submission.

Statutory Language

House Bill 2889 (2023), effective July 18, 2023, described as the technical "clean-up bill" to HB 2001 (2023), known as the Oregon Housing Needs Analysis bill, amended Oregon Revised Statute[1] as follows: "To avoid interference with current planning activities or to avoid unjust or surprising results, the Land Conservation and Development Commission may postpone, for cities specified by the commission, the applicability of section 13, 21, 22 or 23, chapter 13, Oregon Laws 2023 (Enrolled House Bill 2001), and the amendments to ORS 197.286, 197.290, 197.296, 197.297 and 197.303 by sections 12 and 25 to 28, chapter 13, Oregon Laws 2023 (Enrolled House Bill 2001), until a date that is not later than January 1, 2027."

This provision allows LCDC to delay the applicability of certain sections of the OHNA Bill, including "13 [197A.210], 21 [197A.280], 22 [197A.270] or 23 [197A.018], chapter 13, Oregon Laws 2023, and the amendments to ORS 197.286, 197.290, 197.296 [renumbered 197A.350], 197.297 [renumbered 197A.335] and 197.303 [renumbered 197A.348] by

[1] HB 2001, section 9(4) (2023), was amended by HB 2889 (2023), and temporarily compiled as a note after ORS 197A.025 (2023).

sections 12 and 25 to 28, chapter 13, Oregon Laws 2023, until a date that is not later than January 1, 2027.

Temporary Rule Adoption

Accordingly, the Land Conservation and Development Commission (LCDC or commission) adopted a temporary rule package at its June 2026 meeting. The temporary rules, as adopted by the commission, provide that any legislative amendment submitted to DLCD for review on or before January 1, 2027, may apply the versions of OAR chapter 660, divisions 8, 21, and 24 that were in effect prior to the OHNA rule amendments. This is an option for cities like Canby already working on major planning efforts to complete their work under the pre-OHNA rule set.

Meaning of "Submit" Under OAR 660-018-0040 and 660-025-0130/0140

For purposes of the January 1, 2027 deadline, "submit" means that the city (and county, where applicable) has completed local adoption and transmitted the adopted amendment to DLCD under OAR 660-018-0040 or OAR 660-025-0130 to 0140. A complete submittal under OAR 660-025-0130 includes the Notice of Decision required by OAR 660-025-0140(1), the adopted ordinance or ordinances, findings and supporting materials, maps and exhibits, the list of participants required by OAR 660-025-0130(1), and the local record or indexed record consistent with OAR 660-025-0130(3). A project is not considered submitted if it is still in local hearings, has been adopted locally but not transmitted, or if only draft materials have been sent. DLCD must receive the adopted amendment package on or before January 1, 2027.

After the city or county adopts a final decision on a UGB amendment or other work task, the local government must send a Notice of Decision to DLCD and to all participants. The date DLCD receives the Notice of Decision package is the operative "submittal" date for purposes of the temporary rules.

County Adoption Requirements

Because the city's UGB amendment involves land outside the city limits, Clackamas County must also adopt the amendments before they can be submitted to DLCD. The required sequence is that the city first adopts the UGB amendment; the county then adopts the UGB amendment, and the city and county jointly submit the adopted amendments to DLCD under OAR 660-025-0130 to 0140. The January 1, 2027 deadline applies to the final, county-inclusive submittal.

Notice and Objection Process (OAR 660-025-0140)

The Notice of Decision initiates a 21-day objection period during which any person who participated orally or in writing may file an objection with DLCD. If no valid objections are

filed, the Director reviews the submittal. If objections are filed, the DLCD Director reviews the submittal and the objections, addressing the issues raised by the objectors. In either case, the Director has 90 days from the date of submittal to issue a decision.

Components of the Coordinated Package and Applicable Rule Sets

If the city elects to use the pre-OHNA rules under the temporary rules as adopted by the commission, the components of the coordinated package may be reviewed under the pre-OHNA versions Division 24, provided the complete package is submitted to DLCD on or before January 1, 2027.

Consequences of Missing the Deadline

While there is no case law about this topic, the statute could be interpreted to mean that any component submitted after January 1, 2027 must use, as applicable, the most current version of Divisions 8 and 24 and the state OHNA housing allocation. This would require the city to redo its HCA, land need analysis, and UGB justification under the OHNA framework.

Summary

To guarantee legal use of the pre-OHNA rule set, Canby must complete local and county adoption and submit the UGB amendment to DLCD on or before January 1, 2027. "Submit" means DLCD receives the adopted amendment under OAR 660-018-0040 or OAR 660-025-0130 to 0140.

If you have any questions or need further assistance, please contact me at 503-302-0937, ethan.stuckmayer@dlcd.oregon.gov or DLCD Regional Representative Kelly Reid at (971) 345-1987 or kelly.reid@dlcd.oregon.gov.

Sincerely,



Ethan Stuckmayer
Manager, Housing Division
CC:
Brenda Bateman, DLCD
Kirstin Greene, DLCD
Alexis Hammer, DLCD
Kevin Young, DLCD
Kelly Reid, DLCD

Don Hardy

From: SusanMyers@Canby.com
Sent: Wednesday, September 2, 2026 8:40 PM
To: Don Hardy
Cc: Ryan Potter; Jamie Stickel
Subject: Montecucco Rentals, LLC testimony for UGB Expansion City Council meeting Sept 16, 2026

City Council,
I respectfully submit the following for the record for the public hearing to adopt an amendment to the Canby Urban Growth Boundary. I am preparing this ahead of the meeting package as I am leaving on vacation and am unfortunately unavailable to testify before you in person.

I am a member of the PAC and have appreciated the opportunity to personally participate in this process. Montecucco Rentals, LLC and other Montecucco family members own significant amount of property in Areas 1A, 1C, 5, 6, 7, 8. Many of us have participated in all the Summits, stakeholder "listening" sessions and testified at the Planning Commission meeting in August.

As a whole, we feel the City has done a good job of conducting this process and offering many notices and opportunity for participation and we appreciated everyones efforts. While we wish the state would allow development at the north end of Maple (Area 6) rather than on N. 22nd Ave west of Holly St. (the west end of 1A). We own property in both locations and are disappointed, but reconciled to this fact this is not an option.

The reasons we prefer N. Maple is there is a small strip of land already annexed into the City which we will be developing in the future. This area has the street installed with sewer, water, electricity, stormwater drainage, etc. available for development. The property has one owner Montecucco Rentals which would like to develop more of this property as it has heavy soil that has a shorter growing season and less desirable soil type with less overall production.

Montecucco Rentals and I support the UGB expansion and **request the City bringing in the 73 acres of residential and 25 acres of park land in 1A because the state will always make us come back to Area 1A until it is all in the UGB before allowing the City of Canby to bring in Areas 6 or 10.**

After listening to the staff and the consultants relaying info to the Planning Commission after public testimony was closed, we learned that the 3 ac of Neighborhood Commercial is more restrictive than the 25 ac of park land. Plus, we strongly believe Neighborhood Commercial is more likely to be successful in Areas 2 or 3, not in Area 1A; as Areas 2 and 3 are closer to Territorial which has the demographic to support Neighborhood Commercial. Therefore, **we are asking the 3 acres of Neighborhood Commercial not be included in 1A. We feel strongly about this point.**

Regarding the 25 ac of park land, the state is willing to allow acreage be either park or residential, and will allow the City to take that 25 acres of park land that the City is short and disburse it within the existing City limits. Obviously, an appropriate amount of park land, we understand approx. 9 acres, would remain in 1A to serve that growth. We encourage the City to do this distribution of park land in the future as the City as a whole is short of parks, not just the north end of town.

Last, we ask the City to plan for the transportation system that will serve Areas 5 and 6 in the future. At this time the only Collector street is Holly St. Both Maple and Locust are built to local street standards and the City is not installing a grid street system north of Territorial as it develops piece meal. You will note that Areas 5 and 6 are landlocked because they are surrounded by rivers (Willamette and Molalla) with no exit except to the south. This plan acknowledges Area 5 and 6 will be Canby's future residential areas. With the density the State is force on Canby, we need to carefully consider this issued and plan and install streets with will support the future growth of this area.

Thank you for your consideration.

Respectfully,

Susan Myers
Member of Montecucco Rentals, LLC

On Sep 2, 2026, at 5:13 PM, Jamie Stickel <StickelJ@canbyoregon.gov> wrote:

Hello –

The Canby City Council will hold a public hearing to adopt an amendment to the Canby Urban Growth Boundary (UGB) on **Wednesday, September 16, 2026, at 7:00 pm** in City Council Chambers - located on the first floor of City Hall, 222 NE 2nd Avenue, Canby.

The UGB expansion follows the state-mandated process to provide needed residential, employment, and park lands to meet the city's needs over the next 20 years. Adoption of the proposed boundary is the culmination of a three-year process which involved extensive public engagement including a project advisory committee and community meetings.

The UGB amendment public hearing covers the boundary itself. Residential, employment, and park land use designations for the expansion area will be determined through the on-going Concept Plan process, which will have additional community meetings and a separate hearing in 2027.

For meeting details, including agendas and supporting materials, please visit the City of Canby Meetings page. City Council meeting agendas are typically posted by the Friday preceding the meeting. If you are unable to attend the public hearing in person, City Council meetings are streamed live and recordings are available online through the City's YouTube channel: City of Canby YouTube Channel.

You are receiving this message as you have signed up for notifications regarding Cultivating Canby, the citywide effort to update the Comprehensive Plan and the Transportation System Plan (TSP) Update; and expand the Urban Growth Boundary (UGB).

Should you have any questions, please feel free to reach out to me, or I have copied Don Hardy, City Planning Director, and Ryan Potter, City Planning Manager on this email.

Sincerely,

Jamie Stickel
Economic Development Director | Communications Specialist
City of Canby
222 NE 2nd Avenue | PO Box 930
Canby, OR 97013
(p) 503.266.0701 | (m) 503.545.5808
StickelJ@CanbyOregon.gov



September 16, 2026

Mayor Hodson and City Councilors
City of Canby
222 NE 2nd Avenue
Canby, Oregon 97013

Re: Support for Canby Urban Growth Boundary Amendment

Dear Mayor Hodson and City Councilors,

Unfortunately, I am unable to attend tonight's public hearing in person, but I wanted to make sure my support for the proposed Urban Growth Boundary amendment was included in the public record.

As a Canby resident and member of the Public Advisory Committee (PAC) for the UGB expansion, I fully support the staff recommendation before you.

Having been involved in this process, I have been impressed with the work that has gone into getting us to this point. City staff, consultants, the Planning Commission, the City Council, PAC members, and the community at large have all contributed significant time and effort. Most importantly, there has been substantial community involvement throughout the process. While there were difficult decisions along the way, I believe the process ultimately produced the best possible outcome for Canby.

Regarding some of the questions raised during the Planning Commission hearing, I would support including as much parkland as possible in Area 1A. Doing so gives the City the greatest flexibility as we move into concept planning and determine how this area should ultimately develop. With respect to the Neighborhood Commercial designation in Area 1A, I am less convinced that it is necessary or appropriate in this location. For that reason, I would lean toward leaving it out.

After more than three years of work, I look forward to the successful completion of the UGB amendment process. Just as importantly, I hope the City will move quickly into the next phases—concept planning, comprehensive plan amendments, and Transportation System Plan updates for the expansion areas.

The value of bringing employment land into the UGB will only be fully realized if we continue the planning work necessary to make that land available for annexation and development. There is still significant work ahead, and I believe it is important that we move through these next steps efficiently and without unnecessary delay, particularly for the employment lands. Timely annexation and development of these lands will help create

opportunities for new jobs, private investment, and other important community benefits for Canby.

Thank you to the City Council, Planning Commission, City staff, consultants, PAC members, and everyone in the community who has contributed to this effort. I appreciate the thoughtful process that brought us to this point and encourage the Council to approve the staff recommendation and move this important work forward into the next phase.

Sincerely,

Ethan Manuel
Canby Resident
UGB Public Advisory Committee Member

ORDINANCE NO. 1627

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

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

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

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

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

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

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

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

Maya Benham

Maya Benham, CMC
City Recorder

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

YEAS 5 NAYS 0

Brian Hodson
Mayor

ATTEST:

Maya Benham, CMC
City Recorder



June 18, 2024

City of Canby

Acknowledgements

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

Canby City Council

Brian Hodson, Mayor
Traci Hensley, President
James Davis
Jason Padden
Scott Sasse
Daniel Stearns
Herman Maldonado

Canby Planning Commission

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Dan Ewert, Vice Chair
Michael Hutchinson
Jennifer Driskill
Hannah Ellison
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Emma Porricolo

Department of Land Conservation and Development

Sean Edging, Housing Planner
Laura Kelly, Regional Representative
Kelly Reid, Regional Representative

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Introduction

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

Oregon Regulatory Requirements

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

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

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

[1] ORS 197.296 only applies to cities with populations over 25,000.
[2] Government assisted housing can be any housing type listed in ORS 197.303 (a), (c), or (d).

Methodology

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

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

Process

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

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

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

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

Report Organization

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

I. Introduction.

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

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

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

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

Housing Need Projection

Methodology

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

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

Demographic and Socio-Economics

Population

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

Exhibit 1: Population Trends (2000-2022)

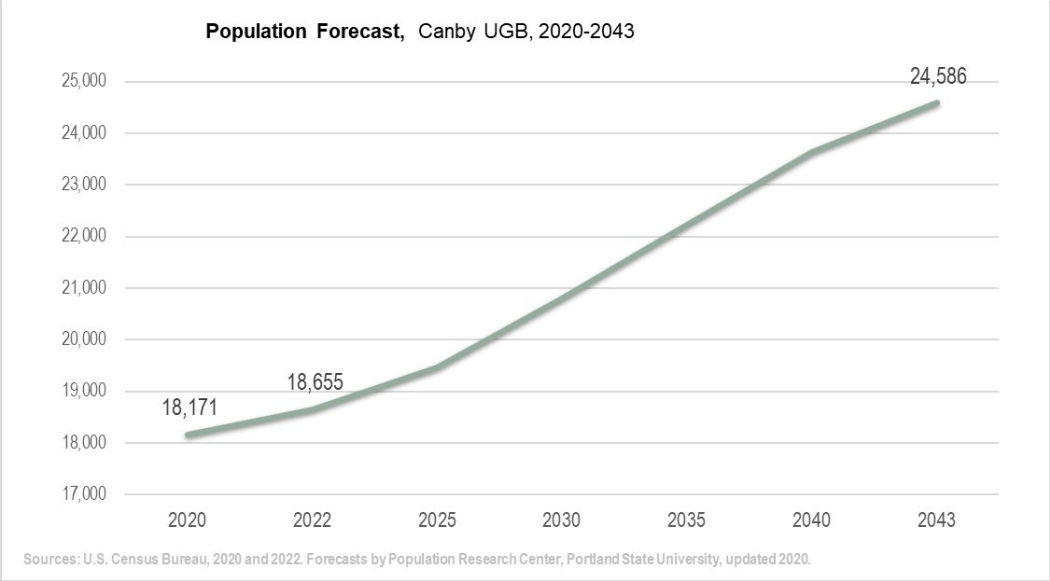
					Annual Growth Rate	
	2000	2010	2020	2022	2000-2010	2010-2022
Clackamas County	338,391	375,992	422,185	429,149	1.06%	1.11%
Canby UGB	13,323	17,097	18,171	18,655	2.53%	0.73%
City of Canby	12,790	15,829	17,210	18,979	2.15%	1.52%

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

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

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

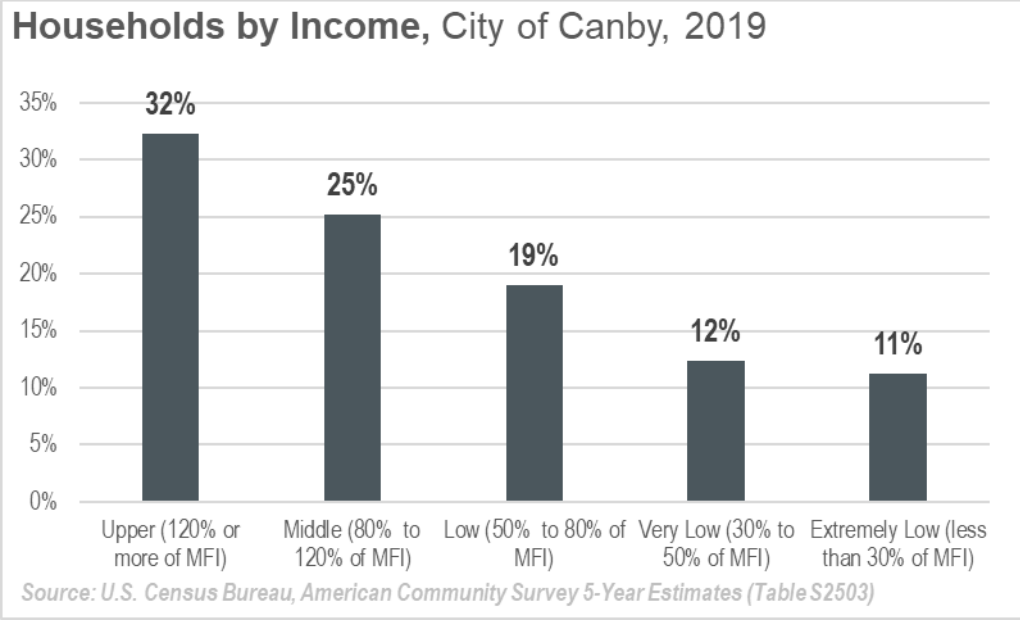
Exhibit 2: Canby UGB Population Forecast (2020-2043)



Socio-economic Characteristics

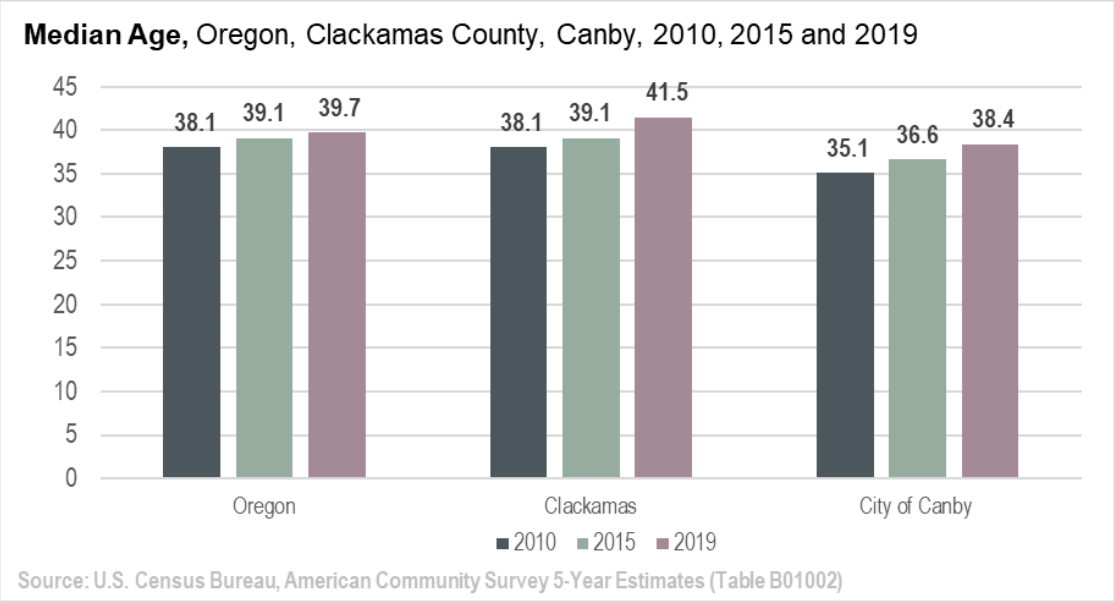
In 2019, the median family income (MFI) in Clackamas County was $80,484. As shown below in Exhibit 3, nearly one third of the households in Canby earn over 120% of the MFI ($96,581 or above).

Exhibit 3: Households by Income Level, 2015-2019



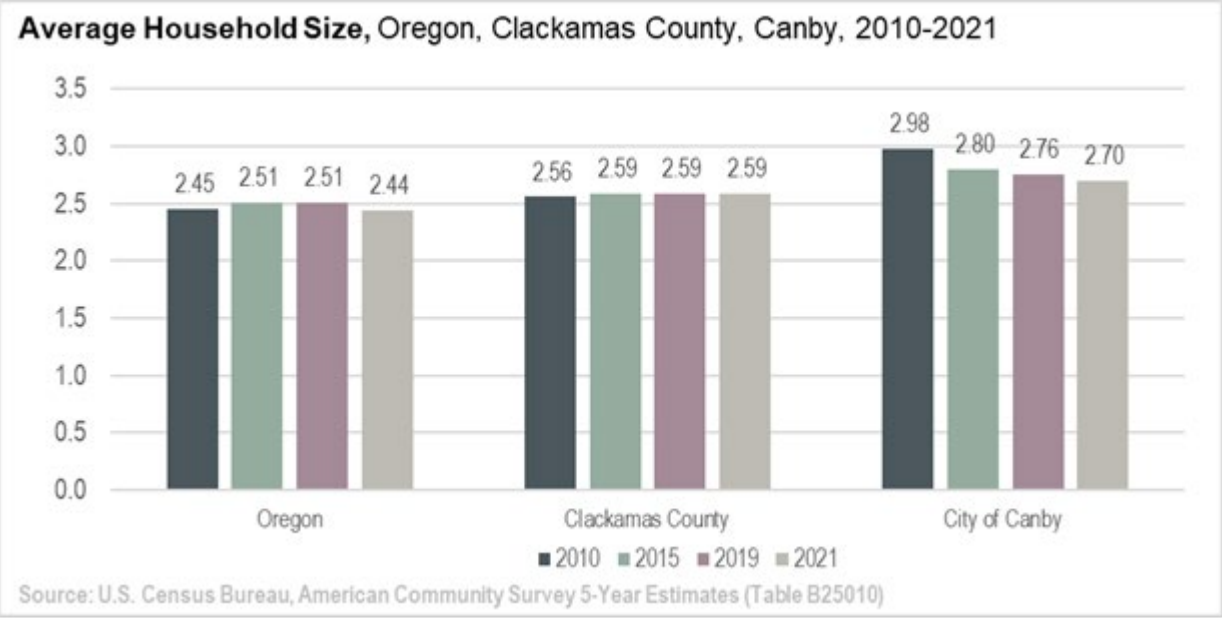
The median age in Canby (38.4) is below the Clackamas County average (41.5) and below the statewide average (39.7) as well (Exhibit 4).

Exhibit 4: Median Age, 2010-2019



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

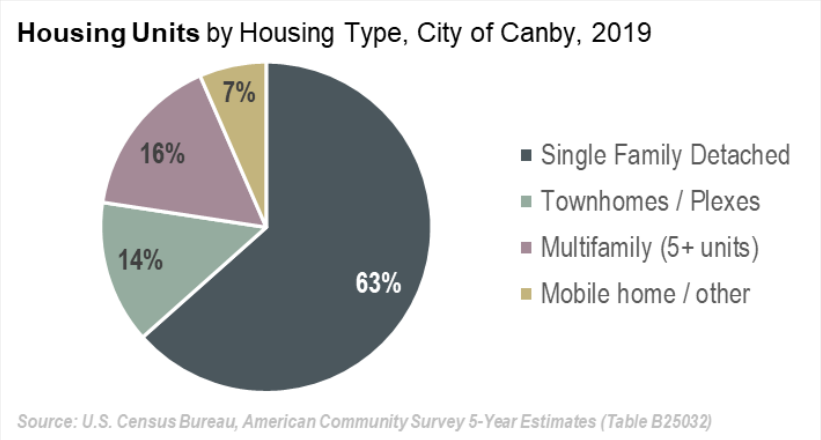
Exhibit 5: City of Canby Average Household Size 2010-2021



Housing Inventory and Tenancy

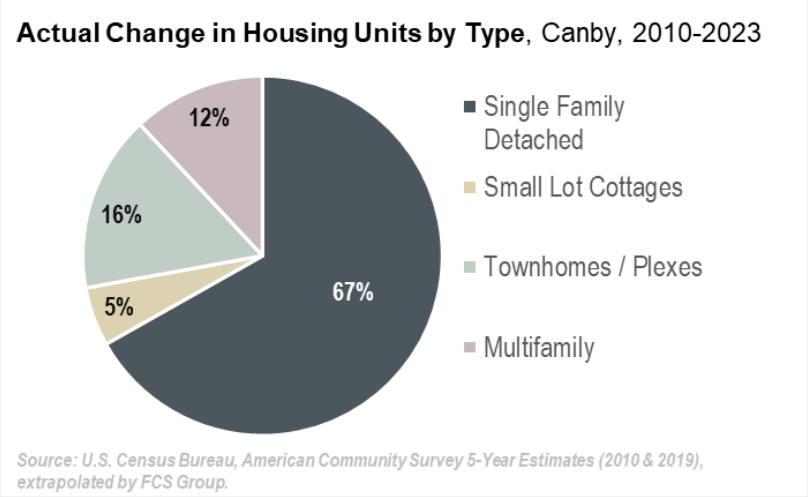
Canby's existing housing inventory and tenancy sheds light on housing conditions and market demand preferences. In 2019, there were 6,608 housing units in Canby of which 6,383 units were classified as occupied and only 225 units were vacant. Like most cities with under 50,000 residents, single-family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

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



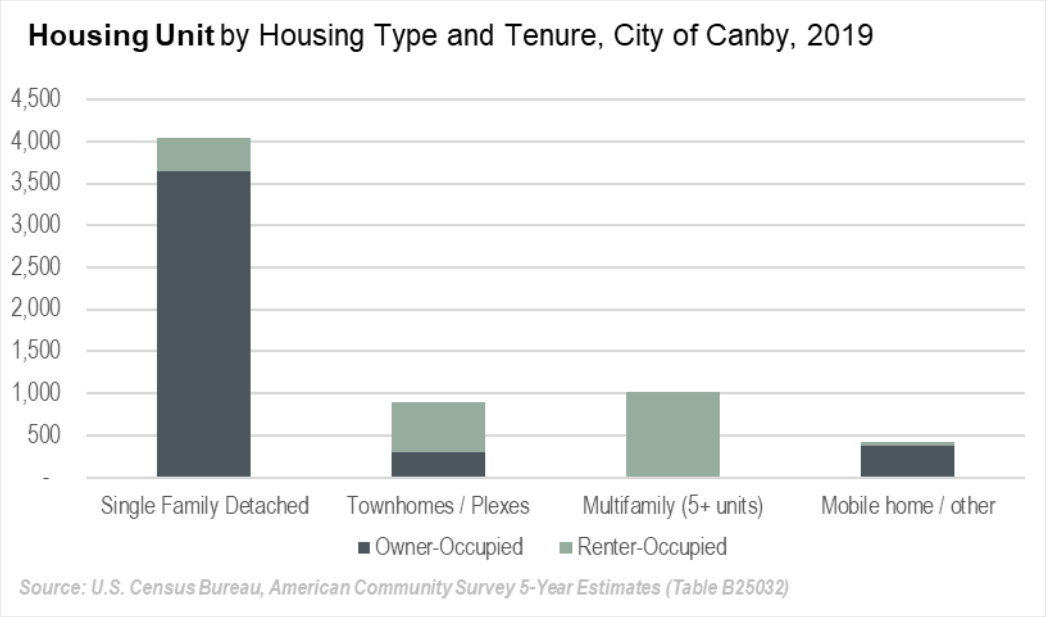
Between 2010 and 2023 the mix of new housing developed in Canby has trended a bit more towards single family detached homes. As indicated in Exhibit 6B, about two-thirds of new housing construction consisted in detached homes, and the remaining one-third was constructed as "middle housing" such as townhomes,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

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



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

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



Housing Market Characteristics

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

Exhibit 8: Canby Housing Affordability Analysis Assumptions

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

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

Exhibit 9: Canby Affordable Housing Analysis: Renters

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

**Note, this analysis is generally consistent with 2.5-person household size.*
*** See assumptions provided in supporting table.*
Source: analysis by FCS Group using Housing and Urban Development data.

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

Exhibit 10: Canby Affordable Housing Analysis: Homeowners

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

**Note, this analysis is generally consistent with 2.5-person household size.*
*** See assumptions provided in supporting table.*
Source: analysis by FCS Group using Housing and Urban Development data.

Canby home values increased significantly between 2019 and 2022, before tapering down in 2023. As indicated in Exhibit 11, the median home value price index in Canby increased to $562,0000 (as of April 2023), with annual average price increase of 8.2% over the past five years. Other cities in the region have experienced even larger home price increases (Exhibit 11).

Exhibit 11: Zillow Home Value Price Index in Select Markets

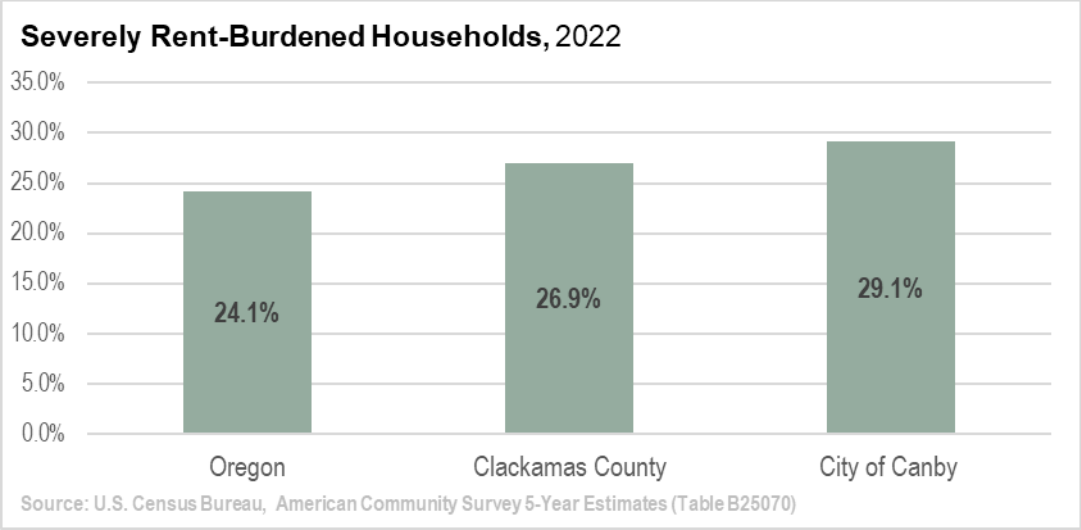
	2019	2020	2021	2022	2023	Annual Change %
Canby	$432,000	$463,000	$560,000	$581,915	$561,936	8.2%
Aurora	$362,000	$393,000	$479,000	$717,490	$656,116	19.6%
Wilsonville	$470,000	$503,000	$606,000	$635,102	$634,357	9.4%
Oregon City	$446,000	$479,000	$579,000	$596,475	$582,212	8.3%

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

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

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

Exhibit 12: Canby Severely Rent-Burdened Households



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

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

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

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

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

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

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

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

Exhibit 14

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

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

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

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

Exhibit 15 Canby Development Construction Pipeline

Canby Housing Construction Pipeline - Unit Count and Acres

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

Source: City of Canby, Nov. 2023.

Housing Needs

Summary of Future Housing Needs

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

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

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

Exhibit 16: Canby Housing Needs Forecast

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

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

Housing Demand by Dwelling Type and Tenancy

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

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

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

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

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

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

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

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

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

Analysis based on preceding tables.

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

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

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

Canby UGB Baseline Housing Needs Forecast by Household Income Level

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

Source: estimates based on prior tables and stated assumptions.

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

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

Exhibit 19: Projected Housing Demand after Pipeline Construction Units are Built

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

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

Note: numbers may not add exactly due to rounding.

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

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

Buildable Land Inventory

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

BLI Methodology

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

1. Calculate gross acres by plan designation, including classifications for fully vacant and partially-vacant parcels. This step entails "clipping" all of the tax lots that are bisected by the current UGB to eliminate land outside current UGB from consideration for development at this time. City staff input was provided to provide a level of quality assurance to review output is consistent with OAR 660-008-0005(2) and OAR 660-009-0015 (3).

2. Calculate gross buildable acres by plan designation by subtracting land that is constrained from future development, such as such as existing public right-of-way, parks and open space, steep slopes, and floodplains. Canby's Comprehensive Plan call for an additional reduction for wetlands from the buildable land.

3. Calculate net buildable acres by plan designation, by subtracting future public facilities such as roads, schools and parks from gross buildable acres.

4. Determine total net buildable acres by plan designation by taking into account potential redevelopment locations and mixed-use development opportunity areas.

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

Residential Land Base

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

Residential Comprehensive Plan Land Use Classifications

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

Residential Zoning Categories

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

These classifications have been kept consistent throughout the analysis.

Land Classifications

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

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

Partially vacant land: Properties that are occupied by a use (e.g., a home or building structure with value over $10,000) but have enough land to be subdivided without the need for rezoning. This determination is made using tax assessor records and satellite imagery. For Single Family lots, it is assumed that ¼ acre (10,890 sq. ft.) is retained by each existing home, and the remainder is included in the part vacant land inventory. For non-single family uses aerial imagery was used to determine the size of the unused portion.

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

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

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

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

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

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

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

Development Constraints

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

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

Land is identified as "suitable for new development" unless it is:

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

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

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

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

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

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

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

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

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

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

Source: 3J Consulting and FCS GROUP.

Redevelopment Opportunities

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

Buildable Land Inventory Results

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

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

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

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

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

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

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

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

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

Source: City of Canby Planning Dept.; Canby Buildable Land Inventory; 3J Consulting, May 2024.
Excludes tax lots contained in the construction pipeline.

Development in the Construction Pipeline

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

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

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

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

Remaining Unconstrained Buildable Residential Land

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

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

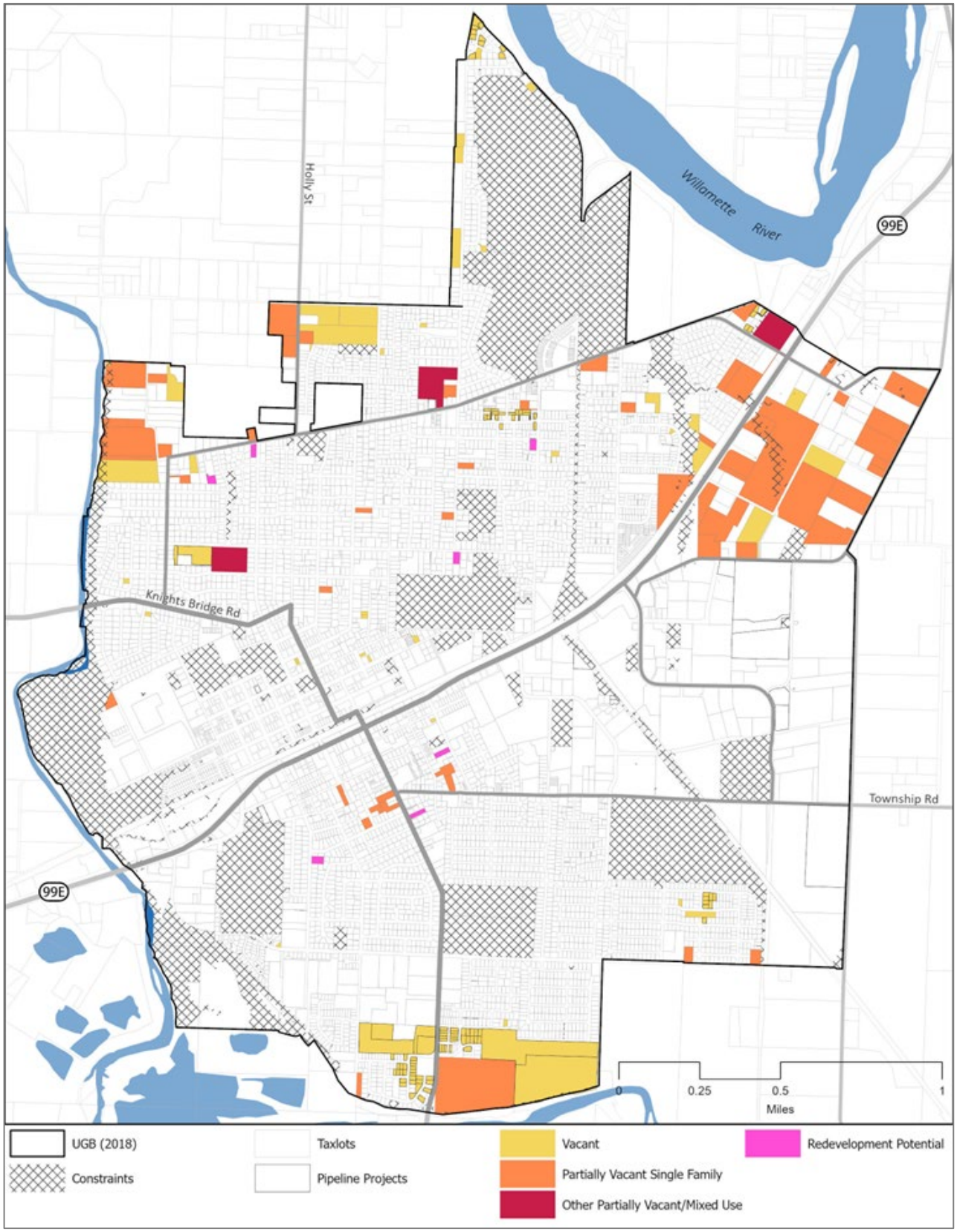
Residential BLI in Canby UGB (after Development in Pipeline Sites are Removed from BLI)

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

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

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

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



Residential Land Need Analysis

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

Housing Need Forecast

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

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

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

Methodology for Forecasting Residential Land Need

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

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

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

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

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

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

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

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

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

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

Dwelling Unit Type	Proj. 20-Year Housing Need (after pipeline units are deducted)	Most Typical Plan Designation [1]	Most Applicable Local Zones [1]	Allowable Density (DU per Net Ac)	Historic Density (DU per Net Ac) [3]	Expected Avg. Density (DU per Net Ac) [4]	Site Requirments (net buildable acres)	Factor for New Street ROW & Utilities [5]	Gross Buildable Land Need (acres)	Proj. Avg. Net Lot Size per DU
Single Family Detached (Standard Lot)	555	LDR	R-1		5.30	5.46			**127.6**	
Single Family (Small Lot)	596	LDR	R-1						**102.7**	
Townhomes / Plexes [1]	364	MDR	R-1.5						**45.3**	
Multi-family/Other [2]	359	HDR/All	R-2, DC	14 to 28+	19.28	19.86			**18.2**	
Total	**1,874**						**238.8**	**1.231**	**293.9**	

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

[1] *Manufactured housing is allowed in all residential zones.*

[2] *Category also includes group quarters housing demand @1.5 persons per dwelling unit.*

[3] *Actual densities based on analysis of new residential building permits, per City of Canby analysis Aug. 2023. Excludes public parks.*

[4] *Assumes 3% increase in historic density after adoption of Housing Production Strategy and HB 2001 housing measures.*

[5] *Reflects site area required for future roads and utility easements; excludes public parks based on city permitting records.*

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

UGB Sufficiency Analysis

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

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

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

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

Exhibit 27: Reconciliation of Residential Land Needs, Canby UGB

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

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

[1] *Manufactured housing is allowed in all residential land use classfications.*

[2] *Category also includes group quarters housing demand.*

[3] *Derived from previous Exhibits.*

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

Findings and Recommendations

Key Findings

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

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

Housing Strategy Recommendations

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

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

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

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

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

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

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

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

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

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

APPENDIX A-1

Analysis of Subdivision Activity

Canby Historic Density Analysis *5.23.2024 update*
Canby Analysis of Apporoved Subdivisions, as of Aug 31, 2023
Year 2017 to 2023 (plus pipeline developments)

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

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

APPENDIX A-2

Analysis of Roads, Public Parks. Utilities within Approved Subdivisions

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

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

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

Appendix A-2 (continued)

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

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

   Example: 50 dwelling unit (DU) small lot subdivision.
   Net Land Area Requirement (excluding parks): 50 DUs / 7.42 DUs per net acre = **6.7 acres**
   Total Gross Buildable Land Requirement (excluding parks) = 1.318 x 6.7 = **8.8 acres**
   Resulting Land Requirement for street right-of-way and utilities: 8.8 – 6.7 = **2.1 acres** *(excludes*

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

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

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

APPENDIX A-3

Analysis of Minor Partitions

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

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

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

APPENDIX A-4

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

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

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

[1] *Manufactured housing is allowed in all residential zones.*

[2] *Category also includes group quarters housing demand @1.5 persons per dwelling unit.*

[3] *Analysis based on safe harbor public facilities factor of 1.25 for all housing types.*

[4] *Assumes 3% increase in historic density after adoption of Housing Production Strategy and HB 2001 housing measures.*

[5] *Reflects site area required for future roads and utility easements; excludes public parks based on city permitting records.*

Scenario 4A: Resulting Overall UGB Land Needed for Housing

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

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

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

[1] *Manufactured housing is allowed in all residential land use classfications.*

[2] *Category also includes group quarters housing demand.*

[3] *Derived from previous Exhibits.*

APPENDIX B-1

Supplemental Safe Harbor Housing and BLI Analysis Scenarios 1-3

Table 1: Housing Mix/Density Safe Harbors

A. Coordinated 20-Year Population Forecast	B. Housing Density Safe Harbor Numbers are in Dwelling Units (DU) per net buildable acre	C. Housing Mix Safe Harbor (Percentage of DU that Must be *Allowed* by zoning)		
		Low Density Residential	Medium Density Residential	High Density Residential
Less than 2,500	• Required Overall Minimum: 3 • Assume for UGB Analysis: 4 • Zone to Allow: 6	70%	20%	10%
2,501 – 10,000	• Required Overall Minimum: 4 • Assume for UGB Analysis: 6 • Zone to Allow: 8	60%	20%	20%
10,001 – 25,000	• Required Overall Minimum: 5 • Assume for UGB Analysis: 7 • Zone to Allow: 9	55%	25%	20%
More than 25,000 but not subject to ORS 197.296	• Required Overall Minimum: 6 • Assume for UGB Analysis: 8 • Zone to Allow: 10	50%	25%	25%

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

APPENDIX B-2

Method 1

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

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

[1] *reflects people residing in shared living areas (congregate care), adjusted to exclude institutionalized population.*

[2] *Includes mobile homes and manufactured dwellings.*

[3] *This applies to all residential zones within City.*

APPENDIX B-3

Method 2: After Pipeline Development Reduction in Housing Need
Safe Harbor Incremental Mix Method 2, Determination of Residential Land Need, Canby UGB

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

[1] Includes mobile homes and manufactured dwellings.

[2] This applies to all residential zones within City.

APPENDIX B-4

Method 3: After Pipeline Development Reduction in Housing Need
Safe Harbor Incremental Mix Method 3, Determination of Residential Land Need, Canby UGB

					Source Notes
1 Existing Percentage of Density of Developed Land	**Existing Dwellings**	**Existing Mix**	**Developed Acres**	**Current DUs Per Acre**	
Low Density Residential [1]	4,136	63%			Table C
Medium Density Residential	1,408	21%			Table C
High Density Residential	1,064	16%			Table C
Total	6,607	100%	**1,497**	**4.4**	Table D1
2 Increase Percentage of Density as follows:	Increase Mix by:	New Mix			
Low Density Residential [1]		48%			see OAR 660-024-0040(i)
Medium Density Residential	10%	31%			see OAR 660-024-0040(i)
High Density Residential	5%	21%			see OAR 660-024-0040(i)
Total		100%			calculation
3 Zone to allow new housing mix	Net New Dwellings Expected	Zone to Allow2	UGB Assumption for Analysis	**Max UGB Land Need (Net Acres)**	
Low Density Residential [1]	555	6.0	5.0	**111.0**	see OAR 660-024-0040(i)
Medium Density Residential	959	16.0	9.0	**106.6**	see OAR 660-024-0040(i)
High Density Residential	359	30.0	19.0	**18.9**	see OAR 660-024-0040(i)
Total/Average	**1,874**	**9.0 +**	**7.0 +**	**236**	see OAR 660-024-0040(i)

[1] Includes mobile homes and manufactured dwellings.

[2] This applies to all residential zones within City.

APPENDIX C

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

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

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

Source: City of Canby Planning Dept.; Canby Buildable Land Inventory; 3J Consulting, May 2024.
Excludes tax lots contained in the construction pipeline.

Residential BLI in Canby UGB (includes just Pipeline developments)

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

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

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

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

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

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

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City of Canby

Planning & Development Services

222 NE 2nd Ave / PO Box 930 / Canby, OR 97013
Phone: 503.266.7001
www.canbyoregon.gov

July 17, 2024 City Council Staff Report

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

Request:

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

SUMMARY CONCLUSIONS

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

PROPOSAL

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

COMPLIANCE WITH CITY OF CANBY MUNICIPAL CODE

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

Canby Title 16.88.180 Comprehensive Plan Amendments

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

2. A public need for the change;
3. Whether the proposed change will serve the public need better than any other change which might be expected to be made;
4. Whether the change will preserve and protect the health, safety and general welfare of the residents in the community;
5. Statewide planning goals.

D. Quasi-judicial Plan Amendment Standards and Criteria. In judging whether a quasi-judicial plan amendment shall be approved, the Planning Commission and City Council shall consider:

1. The remainder of the Comprehensive Plan of the city, as well as the plans and policies of the county, state, or any local school or service districts which may be affected by the amendments;
2. Whether all required public facilities and services exist or will be provided concurrent with the anticipated development of the area.
3. For proposed Comprehensive Plan amendments, which must consider the long-term adequacy of the transportation system for TPR 660-10-060 compliance, ODOT must be consulted to determine whether a highway project is "reasonably likely to be funded" based on funding projections at that time. (Ord. 740 section 10.8.80, 1984; Ord. 981 section 16, 1997; Ord. 1080, 2001; Ord. 1340, 2011; Ord. 1514, 2019)

16.88.190 Conformance with Transportation System Plan and Transportation Planning Rule

A. A proposed Comprehensive Plan amendment, zone change or land use regulation change, whether initiated by the city or by a private interest, shall be reviewed to determine whether it significantly affects a transportation facility, in accordance with the Transportation Planning Rule (OAR 660-012-0060). A plan or land use regulation amendment significantly affects a transportation facility if it:

1. Changes the functional classification of an existing or planned transportation facility;
2. Changes standards implementing a functional classification system;
3. As measured at the end of the planning period identified in the adopted plan:
    a. Allows types or levels of land use that would result in levels of travel or access that are inconsistent with the functional classification of a transportation facility; or
    b. Would reduce the performance of the facility below the minimum acceptable performance standard identified in the Transportation System Plan;
    c. Would worsen the performance of a facility that is otherwise projected to perform below the minimum acceptable performance standard identified in the Transportation System Plan.

B. Amendments to the Comprehensive Plan and land use regulations which significantly affect a transportation facility shall assure that allowed land uses are consistent with the function, capacity, and performance standards (e.g., level of service, volume to capacity ratio, etc.) of the facility identified in the Transportation System Plan. This shall be accomplished by one of the following:

1. Adopting measures that demonstrate allowed land uses are consistent with the planned function, capacity, and performance standards of the transportation facility.

2. Amending the TSP or Comprehensive Plan to provide transportation facilities, improvements or services adequate to support the proposed land uses consistent with the requirements of Section – 0060 of the TPR. Such amendments shall include a funding plan or other mechanism so that the facility, improvement or service will be provided by the end of the planning period.
3. Altering land use designations, densities, or design requirements to reduce demand for vehicle travel and meet travel needs through other modes of transportation.
4. Amending the TSP to modify the planned function, capacity or performance standards of the transportation facility.
5. Providing other measures as a condition of development, including transportation system management measures, demand management or minor transportation improvements.

C. A Traffic Impact Study may be required by the City in accordance with Section 16.08.150. (Ord. 1043, section 3, 2000; Ord. 1237, 2007; Ord. 1340, 2011)

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

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

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

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

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

***Goal 1* Citizen Involvement**

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

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

***Goal 2* Land Use Planning**

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

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

***Goal 3* Agricultural Lands**

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

***Goal 4* Forest Lands**

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

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

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

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

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

***Goal 7* Areas Subject to Natural Hazards**

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

***Goal 8* Recreational Needs**

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

***Goal 9* Economic Development**

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

***Goal 10* Housing**

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

***Goal 11* Public Facilities and Services**

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

***Goal 12* Transportation**

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

***Goal 13* Energy Conservation**

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

***Goal 14* Urbanization**

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

***Goal 15* Willamette River Greenway**

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

***Goal 16* Estuarine Resources**

***Goal 17* Coastal Shorelands**

***Goal 18* Beaches and Dunes**

***Goal 19* Ocean Resources**

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

Conditions

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

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

CONCLUSION

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

CITY COUNCIL EXECUTIVE STAFF REPORT SUMMARY

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

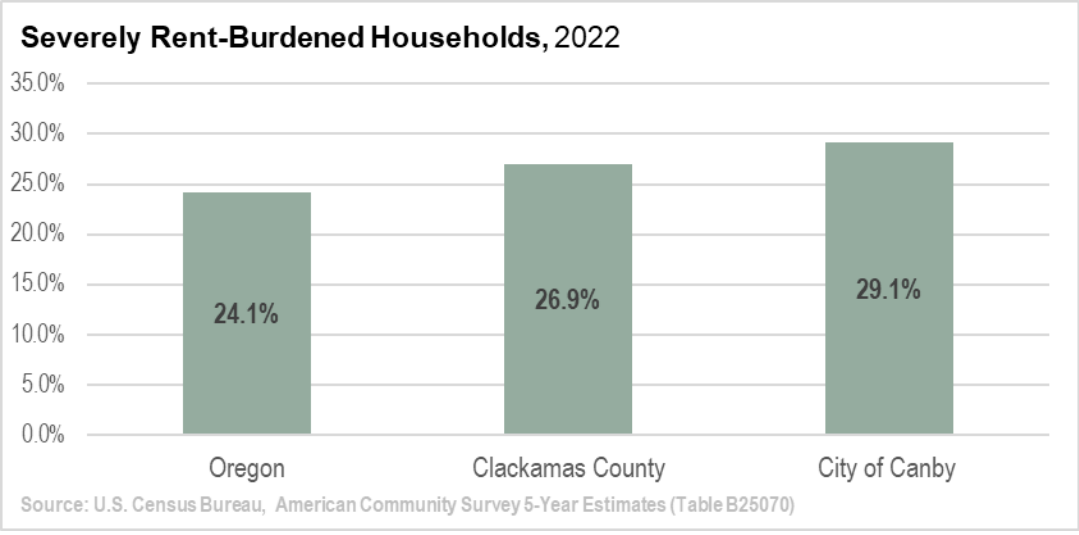
HOUSING NEEDS ANALYSIS SUMMARY

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

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

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

Canby Severely Rent-Burdened Households



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

The draft HNA identified median home prices in Canby:

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

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

The draft HNA identifies housing affordability by income in Canby:

Income by Profession Examples:

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

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

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

Canby Baseline Housing Needs by Tenure & Housing Type

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

Analysis based on preceding tables.

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

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

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

Note: numbers may not add exactly due to rounding.

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

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

The draft HNA identifies the residential land needs by acreage:

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

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

[1] *Manufactured housing is allowed in all residential land use classfications.*

[2] *Category also includes group quarters housing demand.*

[3] *Derived from previous Exhibits.*

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

COMMUNITY OUTREACH

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

Housing advisory group meetings:

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

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

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

Canby Herald Newspaper Articles:

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

RECOMMENDATION

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

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

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

ATTACHMENTS

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

Confirmation of PAPA Online submittal to DLCD

DLCD Plan Amendments
To: Laney Fouse Lawrence
Sent: 5/2/2024 5:31 AM

Canby

Your notice of a revised proposal for a change to a comprehensive plan or land use regulation has been received by the Oregon Department of Land Conservation and Development.
Local File #: TA 23-03
DLCD File #: 005-23
Original Proposal Received: 11/16/2023
Date of Revision: 5/2/2024
First Evidentiary Hearing: 6/10/2024
Final Hearing Date: 7/17/2024
Submitted by: fousel

If you have any questions about this notice, please reply or send an email to plan.amendments@dlcd.oregon.gov.

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

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

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

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

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

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

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

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

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

BEFORE THE PLANNING COMMISSION
OF THE
CITY OF CANBY

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

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

CRITERIA AND STANDARDS

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

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

FINDINGS AND REASONS

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

CONCLUSION

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

I CERTIFY THAT THIS ORDER approving **TA 23-03 City of Canby Housing Needs Analysis**, was presented to and **APPROVED** by the Planning Commission of the City of Canby.
DATED this 24th day of June 2024.

Matt Ellison
Planning Commission Chair

Don Hardy
Planning Director

Laney Fouse Lawrence, Attest
Recording Secretary

ORAL DECISION: June 10, 2024

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

WRITTEN DECISION: June 24, 2024

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

ORDINANCE NO. 1611

AN ORDINANCE ADOPTING THE ECONOMIC OPPORTUNITY ANALYSIS AS PART OF THE CITY OF CANBY COMPREHENSIVE PLAN

WHEREAS, the City Council accepted the Economic Opportunity Analysis (EOA) on April 19, 2023 which needs to be formally adopted into the Canby Comprehensive Plan;

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

WHEREAS, the planning commission recommended approval of the EOA on August 14, 2023; and

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

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

Section 1. They City of Canby City Council hereby adopts the EOA as a text amendment to the Canby Comprehensive Plan as Exhibit A.

SUBMITTED to the Canby City Council and read the first time at a regular meeting therefore on Wednesday, September 6, 2023 ordered posted as required by the Canby City Charter; and scheduled for second reading on Wednesday, September 20, 2023 commencing at the hour of 7:00 PM in the Council Chambers located at 222 NE 2nd Avenue, 1st Floor Canby, Oregon.

Maya Benham

Maya Benham
City Recorder

PASSED on second and final reading by the Canby City Council at a regular meeting thereof on the 20th day of September, 2023, by the following vote:

YEAS 6 NAYS 0

Brian Hodson
Mayor

ATTEST:

Maya Benham
City Recorder

AFFIDAVIT OF POSTING

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

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

That on the 6th day of September, 2023 the Council for said City of Canby held a Regular City Council Meeting, at which meeting Ordinance No. 1611 was read for the first time and passed by the vote of said Council and was then and there ordered posted in at least three (3) public and conspicuous places in said City for a period of five (5) days prior to the second reading and final vote on said Ordinance, as provided in Section 2 of Chapter 8 of the Charter of the City of Canby, and

Thereafter, on the 11th day of September, 2023, I personally posted said Ordinance in the following three (3) conspicuous places, all within the said City of Canby, to wit:

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

That since said posting on the date aforesaid, the said Ordinance will remain posted in the said three (3) public and conspicuous places continuously for the period of more than five (5) days and until the very 20th day of September, 2023.

Maya Benham
Maya Benham, City Recorder

Subscribed and sworn to before me this 25 day of September, 2023.

Emily Lela Sasse
Notary Public for Oregon
My Commission Expires: 12-12-26

OFFICIAL STAMP
EMILY LELA SASSE
NOTARY PUBLIC - OREGON
COMMISSION NO. 1031322
MY COMMISSION EXPIRES DECEMBER 12, 2026

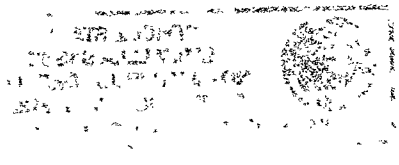


Exhibit A

Canby, Oregon

Economic Opportunities Analysis

Report

March 17, 2023
(Revised May 18, 2023)

This project was funded in part by a grant from the Oregon Department of Land Conservation and Development

FCS GROUP
Solutions-Oriented Consulting

FCS GROUP
Solutions-Oriented Consulting

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"The best way to enjoy your job is to imagine yourself without one." - Oscar Wilde

Section I. INTRODUCTION

The Canby Economic Opportunities Analysis (EOA) is intended to serve as a basis for the City to explore and document new information regarding the City's buildable land inventory (BLI), population and employment trends, and development policies and objectives aimed at strengthening the local economy. The Canby EOA will serve as a basis for the City to document and adopt local policies and actions that help make the City a more economically viable community for residents, businesses and workers.

I.A. OREGON REGULATORY REQUIREMENTS

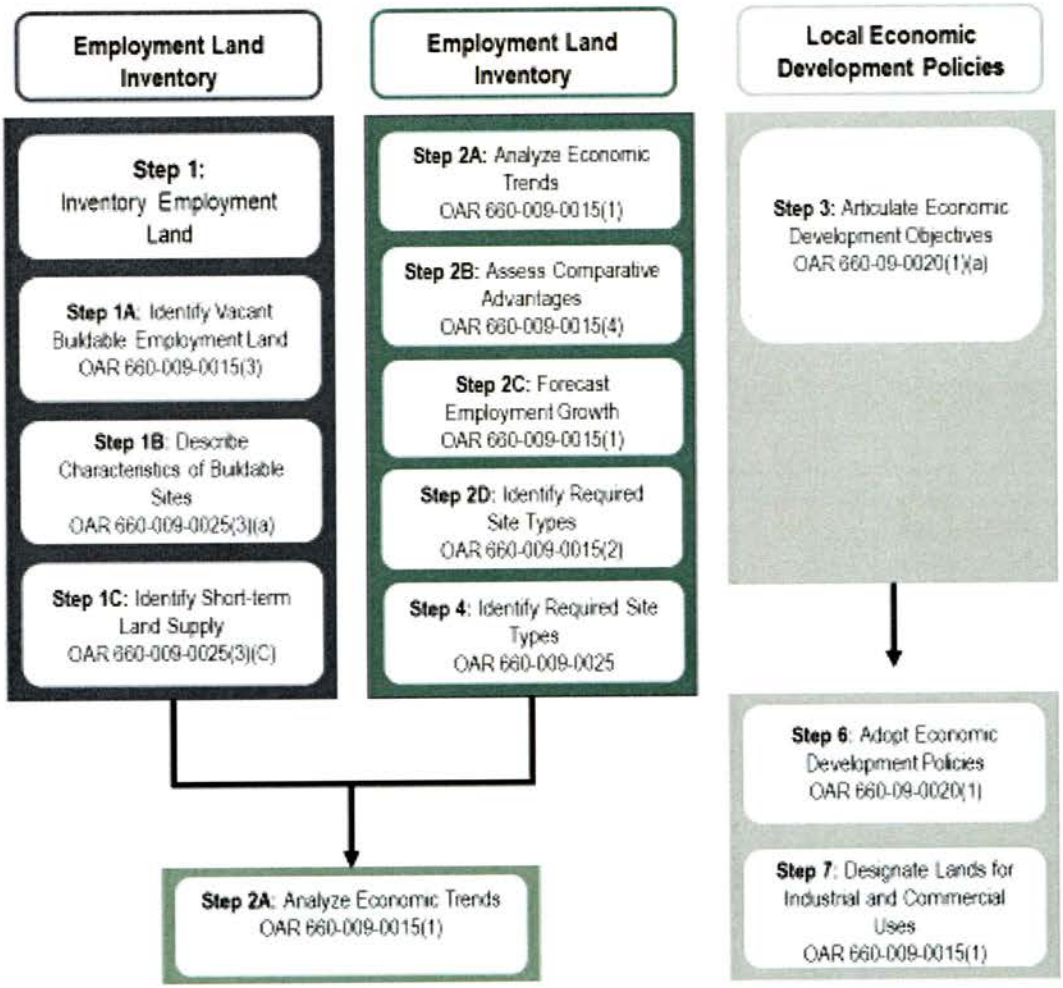
Canby is undergoing a review of its Comprehensive Plan per Oregon requirements. As part of the Comprehensive Plan update, the City must address the requirements of Goal 9 (Economic Development, OAR 660-009). Among other requirements listed in **Appendix A**, Goal 9 requires cities to periodically review and update the following:

- Local vision for strengthening local economies through the adoption of local economic policies that include community economic development objectives;
- Local urban growth requirements (land needs) for providing adequate land needed to accommodate 20-year employment growth forecasts. Land needs are to be based upon:
  - Current analysis of vacant and part-vacant buildable lands that are zoned or planned to accommodate job growth.
  - Forecast land needs based on an Economic Opportunities Analysis that considers global, national and local trends, and is generally consistent with regional growth forecasts or coordinated population growth forecasts.

I.B. METHODOLOGY AND APPROACH

The technical and political approach used for the Canby EOA and related steps are illustrated in **Exhibit 1.** This approach is consistent with the DLCD Goal 9 administrative rule, the supporting OAR 660 guidance, as well as other supporting guidance provided per the DLCD Industrial & Other Employment Lands Analysis Guidebook (2005) and the Economic Development and Employment Land Planning Guidebook (July 2010).

Exhibit 1: Canby EOA Methodology and Approach



Section II. EMERGING TRENDS

This section includes an analysis of economic trends and local competitive advantages according to prepared employment growth forecasts in accordance with OAR 660-009-0015(1-4). The analysis considers local economic development visions, goals, and objectives to inform the growth forecast.

II.A. ECONOMIC OVERVIEW

FCS GROUP conducted an economic overview and market evaluation for office, commercial, industrial, and civic development for the Canby Urban Growth Boundary (UGB). The analysis focused on the expected level of demand for new development related to job growth over the next 20 years.

The United States (U.S.) economy has experienced an economic recovery since the Coronavirus-related economic downturn occurred during early 2019 through 2020. More recently, unemployment rates have declined to near record lows while the national economy has been hampered by persistently high inflation. Current trends reflect positive growth in the U.S. gross domestic product (GDP), which is a measure of the value of goods and services produced. According to Wells Fargo, U.S. GDP is expected to realize a 2.8% year-over-year GDP growth rate in 2022, but little or no real inflation adjusted growth in 2023 and 2024 **(Exhibit 2)**.

As shown in **Exhibit 2**, the U.S. Consumer Price Index (CPI), which is a measure of inflation, is estimated to have increased at a rate of 8% in 2022 with anticipated increases of 3.8% in 2023 and 2.5% in 2024.

Exhibit 2: Global GDP and CPI Growth Projections

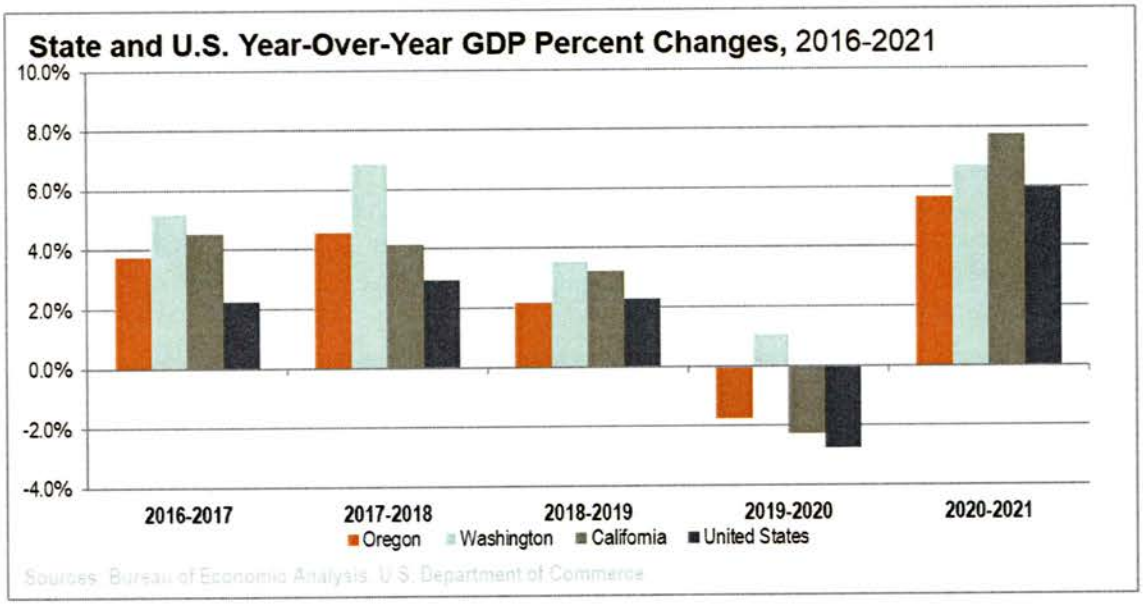
	GDP				CPI			
	2021	2022 Est.	2023 Proj.	2024 Proj.	2021	2022 Est.	2023 Proj.	2024 Proj.
Advanced Economies	5.2%	2.8%	0.2%	1.3%	3.1%	8.0%	5.0%	2.3%
United States	**5.9%**	**2.0%**	**0.2%**	**0.0%**	**4.7%**	**8.0%**	**3.8%**	**2.5%**
Eurozone	5.2%	3.2%	-0.7%	2.0%	2.6%	8.5%	6.2%	2.1%
United Kingdom	7.4%	4.4%	-1.5%	1.7%	2.6%	9.2%	8.9%	2.5%
Japan	1.7%	1.4%	1.2%	1.5%	-0.2%	2.4%	1.8%	0.8%
Australia	4.9%	3.8%	1.7%	2.4%	2.8%	6.4%	4.3%	2.9%
Canada	4.5%	3.5%	0.4%	2.4%	3.4%	6.8%	3.4%	1.9%
Developing Economies	6.6%	2.1%	2.8%	3.5%	5.9%	6.6%	5.2%	4.6%
China	8.1%	3.0%	4.9%	4.9%	0.9%	2.1%	2.3%	2.0%
India	8.7%	6.7%	5.8%	6.3%	5.5%	6.8%	4.5%	5.0%
Mexico	4.8%	3.1%	0.7%	1.8%	5.7%	7.9%	5.4%	3.6%
Brazil	4.6%	3.1%	0.4%	1.9%	8.3%	9.0%	5.0%	4.0%

Source: Wells Fargo, forecast as of December 8, 2022.

Abbreviations: GDP = gross domestic product; CPI = consumer price index

Within the U.S., Oregon tends to exceed the national GDP growth rate. According to the U.S. Bureau of Economic Analysis, Oregon had the 8th fastest growing economy in the U.S., increasing at 2.9% per year from 2016-2021 (**Exhibit 3**).

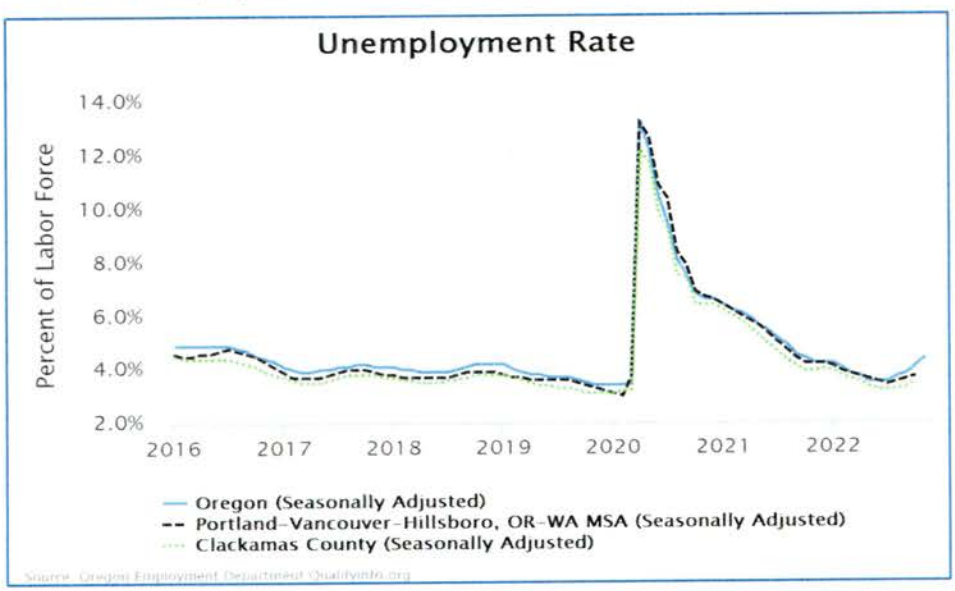
Exhibit 3: GDP Growth in Oregon, the United States, and Selected States



Statewide unemployment rates peaked at a seasonally adjusted rate of 13.3% in April 2020 before falling below 3.5% in July 2022 then ticking up slightly to 4.4% by November 2022 (**Exhibit 4**).

Clackamas County has recorded lower unemployment levels than the state as whole according to the Oregon Employment Department (OED). In October 2022, Clackamas County had an overall unemployment rate of 3.5% with a total employment of 222,549 workers.

Exhibit 4: Unemployment Rates, Clackamas County, Portland MSA, Oregon, 2016-2022



Because the unemployment rate is a measure of the percentage of workers between ages 15 and 64 that are actively looking for a job, it does not reflect factors regarding labor participation rates and underemployment (workers that have accepted low paying jobs since other jobs are not available

locally). In 2021, labor participation rates (the share of civilian population that is employed or unemployed) were slightly higher in Clackamas County (63.9%) compared with the state (62.6%).

II.B. DEMOGRAPHIC TRENDS

Population has been steadily increasing in Canby, Clackamas County, and Oregon as a whole for the past 20 years. Canby's population increased by 42% from 2000 to 2021, from 12,790 residents in 2000 to 18,171 in 2021 and 18,979 in 2022. Canby's average annual growth rate (AGR) in population consistently outpaced the growth rates recorded in Clackamas County and Oregon during the past 21 years (**Exhibit 5**).

Exhibit 5: Population Trends, 2000-2021

	2000	2010	2020	2021	Avg. Growth Rate 2000-2010	2010-2021
Oregon	3,421,399	3,761,925	4,176,346	4,207,177	0.95%	1.02%
Clackamas County	338,391	375,992	422,185	425,316	1.06%	1.13%
City of Canby	12,790	15,829	17,210	18,171	2.15%	1.26%

***Sources**: U.S. Census, PSU Population Research Center*

The long-term population forecasts prepared by Portland State University (PSU) anticipate a continuation of positive growth for Clackamas County. The county is projected to attain a 0.9% AGR between 2020 and 2040. The Canby Urban Growth Boundary (UGB) is projected to grow more quickly than the county, at a rate of 1.3% per year (**Exhibit 6**).

Exhibit 6: Population Projections, 2020-2043

	2020	2022	2025	2030	2035	2040	2043	AGR (2020-2040)
Clackamas	421,401	429,149	437,222	460,401	483,349	505,622	519,632	0.9%
Canby UGB	18,171	18,655	19,468	20,796	22,234	23,635	24,586	1.3%

***Source:** Population Research Center, Portland State University, June 30,2020*

In 2020, 87% of Canby's population 25 years and over had graduated from high school, which was a smaller percentage than that of the State (91%), and the County (94%) as shown in **Exhibit 7**. Additionally, 26% of Canby's population 25 years and over had obtained a bachelor's degree and 10% of the city's population had achieved a graduate degree.

Exhibit 7: Educational Attainment of Population 25 years and over, 2020

	Oregon	Clackamas County	Canby
Less than high school	9%	6%	13%
High school	48%	46%	51%
College	30%	34%	26%
Graduate School	13%	13%	10%
Total	100%	100%	100%

Source: U.S. Census Bureau, American Community Survey 5-Year Estimates (Tables B15003)

Canby workers are far more likely to be employed in manufacturing occupations as compared with Clackamas County and the State. In 2019, nearly 22% of Canby's jobs were in manufacturing,

compared with 11% in Clackamas County and 10% in Oregon. Construction (15%) Retail trade (11%), educational services (8%), accommodation and food service (8%), and health care (8%) also represent significant shares of jobs in Canby (**Exhibit 8**).

Exhibit 8: Occupations for the Employed Population 16 years and over, 2016

	Canby	Clackamas County	Oregon
Agriculture, Forestry, Fishing and Hunting	0.9%	2.7%	2.6%
Utilities	0.5%	0.3%	0.5%
Construction	15.2%	8.8%	6.0%
Manufacturing	21.7%	11.2%	10.1%
Wholesale Trade	6.5%	6.4%	3.9%
Retail Trade	10.9%	11.6%	10.5%
Transportation and Warehousing	2.6%	2.4%	3.6%
Information	2.6%	1.4%	2.0%
Finance and Insurance	2.0%	3.4%	3.0%
Real Estate and Rental and Leasing	0.9%	1.4%	1.5%
Professional, Scientific, and Technical Services	2.5%	6.2%	5.4%
Management of Companies and Enterprises	0.0%	1.5%	2.7%
Admin. & Support, Waste Mgmt.	1.7%	5.0%	5.5%
Educational Services	8.4%	6.5%	8.2%
Health Care and Social Assistance	8.3%	13.8%	14.8%
Arts, Entertainment, and Recreation	1.5%	1.6%	1.7%
Accommodation and Food Services	8.4%	8.1%	9.3%
Other Services (excluding Public Administration)	4.0%	4.6%	4.4%
Public Administration	1.4%	2.9%	4.2%
Total	**100%**	**100%**	**100%**

ɔs)

II.C. INCOME AND EMPLOYMENT TRENDS

Income levels for Canby's residents tend to be below those of Clackamas County but well above the state as a whole. Between 2010 and 2020, median household and family incomes for residents of Canby increased measurably but were outpaced slightly by growth rates observed statewide and in Clackamas County (**Exhibit 9**).

In 2020, the median household income within Canby was much higher for owner-occupied households ($91,523) than for renter households ($49,677).

Exhibit 9: Income Trends, 2010-2020

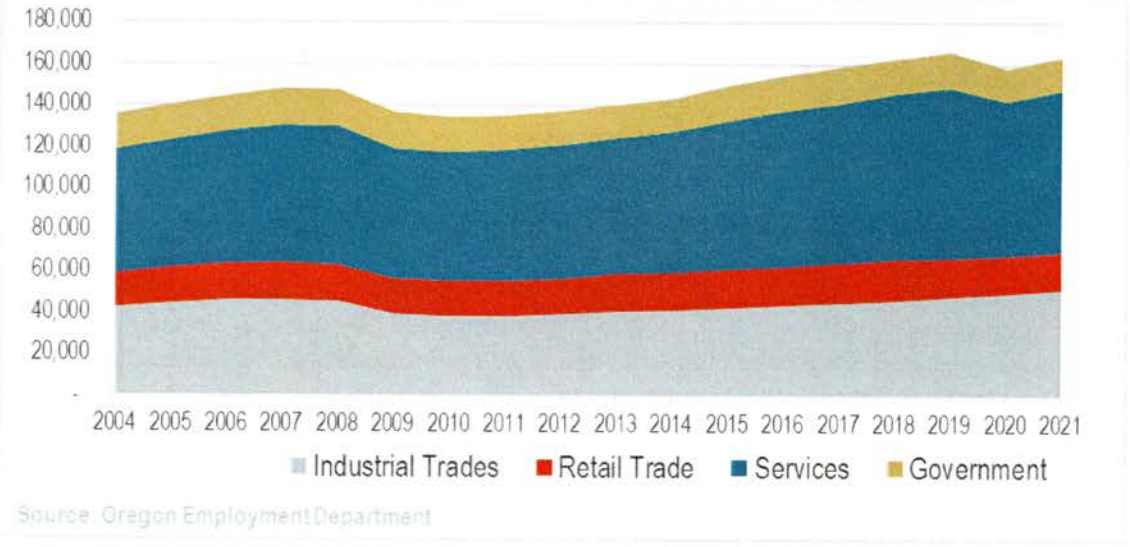
Median Household Income	2010	2020	AGR
Canby	**$57,427**	**$74,825**	**2.7%**
Clackamas County	$62,007	$82,911	2.9%
Oregon	$49,260	$65,667	2.9%
Median Family Income Trends	**2010**	**2020**	**AGR**
Canby	**$67,370**	**$87,173**	**2.6%**
Clackamas County	$74,905	$100,172	2.9%
Oregon	$60,402	$80,630	2.9%

Source: U.S. Census Bureau, American Community Survey 5-Year Estimates (Table B2 and Table B10113).

AGR: average annual growth rate.

In 2021, the total at-place-of-work employment within Clackamas County recorded 164,593 workers (nonfarm workers). Within Clackamas County, the services sector (professional business services, leisure and hospitality and financial activities) accounts for 48% of the employment. Industrial trades and retail trades are next with 31% and 11% of the jobs, and the government sector accounted for 10% of the employment base (**Exhibit 10**).

Exhibit 10: Employment Trends by Sector in Clackamas County, 2004-2021*

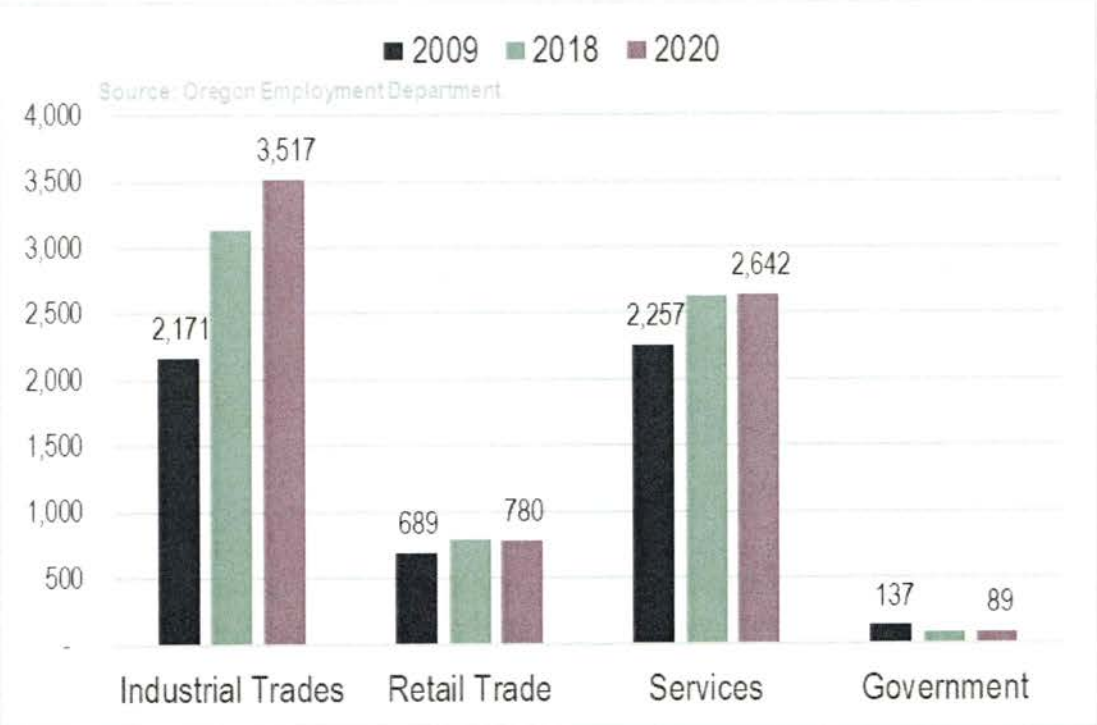


**Note, the job estimates shown above may tend to understate the total number of employees that work in Clackamas County since Oregon Employment Data only includes nonfarm workers that are covered by unemployment insurance. Hence, the OED estimates tend to exclude smaller home-based businesses and part-time workers that do not pay workers compensation insurance.*

Employment in Canby has increased significantly in recent years. According to the Oregon Employment Department, the total number of jobs covered by unemployment insurance increased to

7,028 jobs up from 6,718 in 2018. Half of Canby's employment is in the strong and growing industrial sector which added 1,348 jobs between 2014 and 2020. The services sector accounts for 38% of employment in the city, followed by the retail trade sector which accounted for 11% of all jobs in 2020 (**Exhibit 11**).

Exhibit 11: Employment Trends by Sector in Canby, 2009-2020



Canby's top private employers include a wide range of business types, as shown in **Exhibit 12.** In 2020 there were 11 private employers in Canby that each employed between 100 and 350 workers. These local businesses generated an estimated $274 to $316 million in annual GDP.

Exhibit 12: Canby's Top Private Employers, 2020

	Description	Annual GDP ($M)	Emp. Range
Larusso Concrete Inc.	Masonry Contractors	$ 13.6 to $ 17.0	100-125
Marquis Companies I Inc.	Assisted Living Facilities for the Elderly	$ 11.8 to $ 14.1	125-150
Wilson Construction Co.	Power and Communication Line Construction	$ 17.0 to $ 20.4	125-150
Shimadzu USA Manufacturing Inc.	Analytical Laboratory Instrument Manufacturing	$ 24.7 to $ 28.2	175-200
Kendal Floral Supply LLC	Flower, Nursery Stock, and Florists' Supplies	$ 22.8 to $ 26.0	175-200
MEC Northwest	Printed Circuit Assembly Manufacturing	$ 24.7 to $ 28.2	175-200
JMJ Construction LLC	New Single-Family Housing Construction	$ 27.1 to $ 30.5	200-225
Johnson Controls Battery Group Inc.	Storage Battery Manufacturing	$ 28.2 to $ 31.7	200-225
Fred Meyer	Warehouse Clubs and Supercenters	$ 21.3 to $ 23.4	250-275
Colima Construction LLC	Drywall, Plaster Work & Building Insulation	$ 40.7 to $ 47.5	300-350
Columbia Distributing	Beverage Merchant Wholesalers	$ 40.7 to $ 47.5	300-350

Source: Clackamas County Economic Landscape analysis by FCS GROUP, 2022.
Note: Data represents employment in 2020

Canby has been successful at adding employers of all sizes. Between 2009 and 2020 the number of employer establishments in Canby increased from 481 to 616 (over 12 per year on average). Significant growth has occurred in small, medium and very large business categories, as shown in **Exhibit 13.**

Exhibit 13: Canby's Employers by Number of Workers per Establishment, 2009-2020

Employee Count per Establishment	Number of Establishments				
	2009	2020	2009 Dist.	2020 Dist.	% Change
0-1	166	227	35%	37%	37%
2-10	209	256	43%	42%	22%
11-25	63	76	13%	12%	21%
26-49	18	28	4%	5%	56%
50-100	17	17	4%	3%	0%
101+	8	12	2%	2%	50%
Total	**481**	**616**	**100%**	**100%**	28%

Source: Oregon Employment Department.

II.D. TARGET BUSINESS CLUSTERS

Location quotient (LQ) analysis is a method of determining which business sectors are clustered in the City of Canby in comparison to the Oregon state average. LQ analysis reveals what makes the local economy "unique" in comparison to a broader geography. The LQ analysis indicates existing and potential emerging business clusters present in Canby based on their size (as measured by employment) and projected growth potential. The data used for the cluster analyses were derived from the Oregon Employment Department 2020 wage and salary employment statistics and the Clackamas, Multnomah, and Washington County job growth projections described previously applied to City of Canby current employment estimates.

Business clusters in Canby with high LQs include arts, entertainment and recreation, wholesale trade, manufacturing, construction, utilities, information, retail trade and other services.

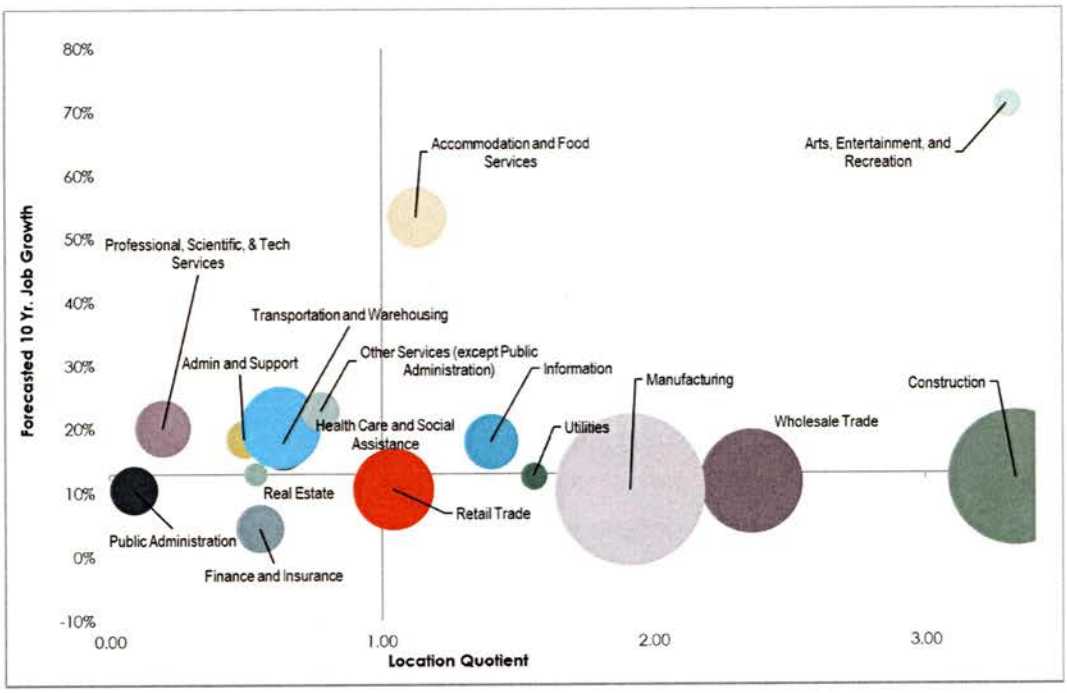
For example, the wholesale trade sector, a cluster which includes Kendal Floral Supply and American Metals, has an LQ of 2.65 which signifies that this business cluster is more than twice as concentrated in Canby than the statewide average (**Exhibit 14**).

Clusters with less than 1.0 LQ may represent a business cluster with either a competitive disadvantage (e.g., from lack of access to key markets) or business clusters with pent-up demand. Clusters with pent-up demand may represent "emerging" opportunities if the job growth rate is projected to be higher than average. For example, the health care cluster has a 0.62 LQ and a high job growth forecast (20% projected growth between 2020 and 2030) so it may now be in position to expand if local employment sites and workforce training opportunities are provided locally.

The preliminary list of target industries for Canby includes several existing and emerging clusters including:

- Advanced Manufacturing: metals and machinery
- High tech Manufacturing & Testing: electrical components, battery storage, etc.
- Construction trades
- Wholesale trade
- Health services

Exhibit I4: Industry Cluster Location Quotients and Forecasted Growth, Canby Area



Compiled by FCS Group based on Oregon Employment Department data from 2020.

During the EOA planning process, FCS conducted meetings with the project advisory committee, and the public, and interviewed local business stakeholders to ascertain local business expansion plans and relative market advantages Canby has for attracting and retaining various types of businesses. The input from those meetings combined with the analysis of growth trends suggests that Canby could have a high degree of success in attracting specific clusters of industries to its commercial and industrial lands, as summarized in **Exhibit 15**.

In addition to the target industries listed in Exhibit 15, feedback from stakeholder interviews and public surveys indicated that Canby should also aim to attract additional commercial retail, professional and business services, entertainment/recreation, hotels, and business-to-business supply chains in flexible light industrial buildings. Mixed support was voiced for additional warehousing

and distribution operations in the City given relatively low employment density and wages offered by that sector.

Exhibit I5: Potential Target Industries for Canby

Target Industry Category	Market Potential	Relative Wage Rates	Potential Job Creation	Target Industry	Example Businesses
Advanced Manufacturing	●	●	●	☑	
Energy Systems	●	●	●	☑	Johnson Controls
Electronic Component Manufacturing	●	●	●	☑	MEC Northwest
Fabricated Metal Product Manufacturing	●	●	●	☑	JV Northwest
Navigational, Measuring, Electromedical, and Control Instruments	●	●	●	☑	Shimadzu USA, FLIR
Composit Materials and Product Manufacturing	●	●	●	☐	Larusso Concrete
Construction related	●	●	●	☐	Colima Construction, JMJ Construction, Wilson
Food/Beverage Processing	●	●	●	☑	Puddin' River Chocolates, Cutsforth's
Transportation and Distribution	●	●	●	☐	Kendal Floral, Amazon
Health Care	●	●	●	☑	Providence
Legend: Good: ● Fair: ● Poor: ○					

Source: FCS GROUP.

II.E. REGIONAL EMPLOYMENT GROWTH FORECAST

The Oregon Employment Department prepares employment forecasts for "regions" throughout Oregon. Canby's region includes Clackamas, Multnomah and Washington counties. As shown in **Exhibit 16**, the tri-county region is projected to experience positive growth over the next 10 years across all job sectors. The sectors that are projected to add the most net new jobs include: transportation and warehousing, professional, scientific & tech services, health care and social assistance, construction and educational services.

Exhibit 16: Projected Job Growth s by Industry for Clackamas, Multnomah and Washington Counties 2020-2030

Sector	2020	2030	Change in Jobs	% Change	AAGR Trend
Industrial Trades	254,400	285,100	30,700	12%	1.15%
Retail Trade	87,700	97,100	9,400	11%	1.02%
Services	542,400	663,900	121,500	22%	2.04%
Government	112,000	123,800	11,800	11%	1.01%
Total	**996,500**	**1,169,900**	**173,400**	**17%**	1.62%

Source: Oregon Employment Department. Includes Clackamas, Multnomah & Washington counties.

Section III. Opportunities And Constraints Analysis

Current market trends regarding visitation, business openings & closures, and perceived market considerations are important factors to consider when evaluating the ability for Canby to retain or attract economic development. A summary of these considerations follows.

III.A. BUSINESS OPENINGS/CLOSURES

Canby has witnessed several notable business openings and expansions over the past four years. **Exhibit 17** summarizes the most significant openings and expansions in the area, ranging from the opening of a manufacturing facility by Caldera International (medical products) to numerous food and beverage establishments.

Exhibit 17: Canby Business Openings and Closures May 2013-2018

Name	Industry	Date
Openings/Expansions		
Siren Song	Leisure and hospitality	9/9/2021
Art-O-Maddic	Retail trade	6/18/2021
B's Bake Shoppe	Leisure and hospitality	8/5/2020
Caldera International	Manufacturing	8/26/2019
Coffee Doodle Doo	Leisure and hospitality	8/9/2019
Wayward Sandwiches	Leisure and hospitality	5/9/2019
Columbia Distributing	Transportation, warehousing and utilities	5/2/2019
Neurotherapeutic Pediatric Therapies	Health care and social assistance	4/24/2019
Baker's Prairie Bakery	Leisure and hospitality	12/12/2018
TMK Creamery	Manufacturing	2/29/2018
HealthMarkets Insurance Agency	Financial activities	2/28/2018
Closures		
Dave's Prescription Shop	Retail trade	5/7/2019
Secret Garden Floral	Retail trade	2/11/2019

Source: Oregon Employment Department.

III.B. INDUSTRIAL LEADS

Over the years, Canby has recorded numerous business leads that have or are currently expressing interest in industrial property in Canby. Selected business leads are listed below.

- Oregon Liquor Control Commission distribution warehouse
- Amazon distribution center which would employ 500

III.C. RETAIL TRADE

FCS GROUP conducted an analysis of retail sales data to identify existing retail trade flows within the Canby market area. The analysis examines the consumer retail demand and existing estimated sales within a 15, 30- and 45-minute drive time of Canby (to/from downtown).

The retail trade flow analysis measures the difference between local buying power from resident demand within the footprint of the analysis area and the actual sales in the same area. The retail trade analysis summary shown in **Exhibit 18** indicates that Canby retail and food service establishments attract a significant amount of retail inflow (local sales are far greater than local buying power).

Based on the analysis of individual store groups there is also a retail outflow which means most Canby's residents currently travel outside the area to make purchases in the following store group categories:

- Building Materials, Garden Equipment & Supply Stores
- Electronics and Appliance Stores
- Motor vehicle sales, auto parts and supply stores

Exhibit 18: Canby Retail Market Trade Area Profile, 2020

	15 Minutes	30 Minutes	45 Minutes
Population	82,389	683,585	1,435,758
Households	31,525	263,114	569,834
Aggregate Income	$3,233,438,694	$28,456,276,380	$56,534,407,008
Total Demand and Sales (Supply) within Trade Area			
Demand	$1,070,657,334	$9,677,982,953	$18,957,694,917
Supply	$1,286,857,770	$10,621,285,989	$19,600,993,128
Retail Trade Outflow/(Inflow)	$216,200,436	$943,303,036	$643,298,211
Food and Drink Demand and Sales (Supply) within Trade Area			
Demand	$115,970,767	$1,064,867,750	$2,111,201,777
Supply	$101,291,611	$1,030,244,223	$2,480,737,818
Retail Trade Outflow/(Inflow)	($14,679,156)	($34,623,527)	$369,536,041

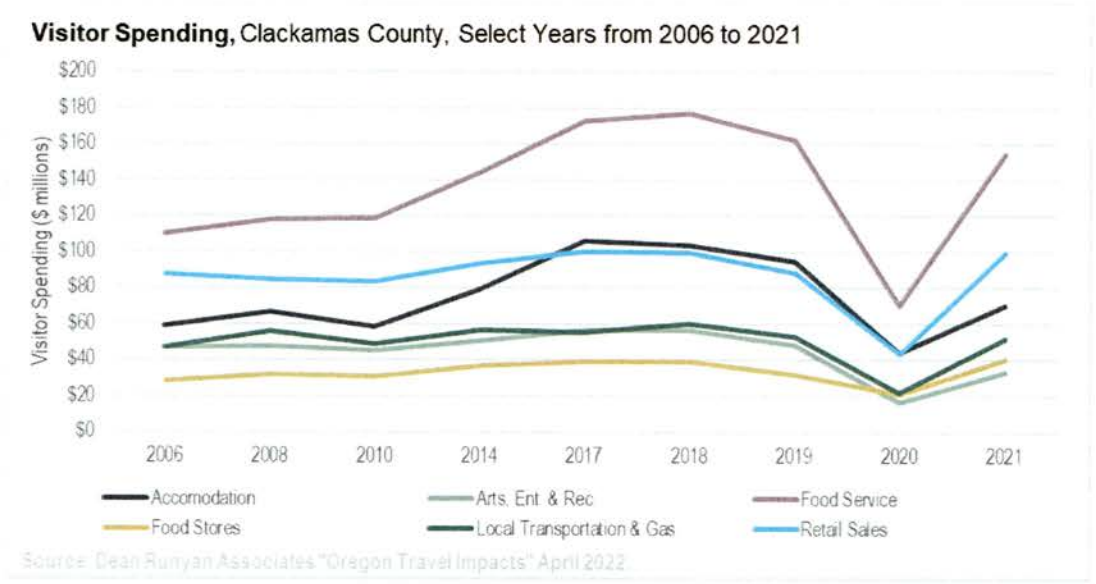
Source: *ESRI Business Analyst Online*

III.D. VISITATION

The recreation and visitation industry has long been a bright spot within Clackamas County. County residents and visitors enjoy access to abundant recreational opportunities afforded by the Clackamas River, Mount Hood National Forest, wineries, breweries, skiing on Mount Hood, agritourism and other activities.

Exhibit 19 depicts trends in visitor spending within Clackamas County between 2006 and 2021. Visitor spending reached a record level in 2018 at $537 million, a total which declined measurably during the pandemic in 2020 before recovering in 2021 to $451 million. In 2021 the leading sector for visitor spending was food service establishments followed by accommodation, retail spending, local transportation and gas, arts, entertainment and recreation and food stores.

Exhibit 19: Visitor Spending in Millions (2012-2021)



Source: Dean Runyan Associates "Oregon Travel Impacts" April 2022

Section IV. Employment Growth and Land Inventory & Needs

In light of the trends and opportunities identified above, the Canby EOA Advisory Committee evaluated three alternative employment growth forecasts for the Canby UGB (see **Exhibit 20**).

Low Growth Forecast Scenario: this scenario assumes Canby's overall employment growth reflects a *Safe Harbor* assumption ties the overall average annual job growth rate (1.79%) to be generally consistent with the projected housing growth rate over the next 20 years. Overall job growth in Canby would increase by 3.270 jobs from 7,665 jobs (2023 est.) to 10,935 jobs in 20 years.

Medium Growth Forecast Scenario: this scenario reflects the level of job growth anticipated based on actual historic job growth rates for major sectors including industrial, retail, services and government. Historic growth rates were derived from 2009-2020 trends in covered employment within the City of Canby using Oregon Employment Department estimates for the industrial, retail and service sectors. Government sector growth rates are assumed to reflect the long-term population growth rate for the Canby UGB. This scenario would result in an average annual employment growth rate of 3.2%. Overall job growth in Canby would increase by 6,778 jobs from 7,665 jobs currently to 14,443 in 20 years.

High Growth Forecast Scenario: this scenario is consistent with the medium growth forecast but includes the local aspirational objective to attract additional living wage jobs into Canby. This scenario assumes that there are adequate sites to accommodate the addition of 300 industrial jobs and 460 service sector jobs over and above the assumptions shown in the medium scenario. The rational for the additional service job growth assumes that the City's annual rate of growth in this sector (2.04%) equates to the long-range forecast for the Region (includes Clackamas, Multnomah and Washington Counties) per Oregon Employment Department's long range job growth forecast. This scenario would result in an overall average annual employment growth rate of 3.5%. Overall job growth in Canby would increase by 7,576 jobs from 7,665 jobs currently to 15,241 in 20 years.

Exhibit 20: Employment Growth Forecast, Canby UGB

				Annual Growth Rates		Proj. Canby Growth Rate			20-Year Job Growth Forecast		
Sector	2009	2020	2023 Est.	Canby Trend	Regional Forecast	Low	Medium	High	Low	Medium	High
Industrial Trades	2,171	3,517	4,012	4.48%	1.15%	2.24%	4.48%	4.64%	2,238	5,632	5,932
Retail Trade	689	780	807	1.13%	1.02%	1.02%	1.13%	1.32%	182	204	243
Services	2,257	2,642	2,758	1.44%	2.04%	1.32%	1.44%	2.04%	829	914	1,374
Government	137	89	89	-3.85%	1.01%	1.01%	1.32%	1.32%	20	27	27
Total	**5,254**	**7,028**	**7,665**	2.68%	1.62%	1.79%	3.22%	3.50%	**3,270**	**6,778**	**7,576**

Source: Oregon Employment Department (historic trend and regional forecast) and stated assumptons.

Employment Land Needs Assessment

The employment land need for the Canby UGB is calculated using the following steps:

1. Allocating the growth forecasts into building types based on each sector's typical space needs for office, general government, retail/service, general industrial, flex/business park and warehousing/distribution.
2. Applying an average job density (floor area square feet per job) based on the building types listed above;
3. Applying a work-at-home assumption for the various building types
4. Allocating building absorption among two categories: refill/redevelopment demand (jobs added into existing buildings); and vacant land demand (jobs requiring building expansions or new buildings on vacant or part-vacant lands).
5. Applying a net-to-gross land area factor of 1.25 to account for public roadways and utilities required to serve new development on vacant and part-vacant lands.

Employment density assumptions for forecasting land needs are illustrated in **Exhibit 21** and detailed calculations are provided in **Appendix D**.

Refill/Redevelopment and Work at Home Assumptions

To keep employment land needs forecasts conservative, the vacant land need factors out work-at-home assumptions and includes separate calculations for building refill/redevelopment assumptions. People that work at home and jobs added within existing buildings through infill/redevelopment would not require any vacant land.

This analysis assumes that the amount of building refill that is expected to occur in existing buildings reduces net new development requirements by 15,000 to 24,000 SF of floor area for commercial buildings; and 3,000 to 4,000 SF for government buildings (detailed calculations shown in **Appendix D**).

Mixed Use Development Assumptions

The analysis of employment land needs assumes that all buildable mixed use land zoned land in Canby is developed with 1 ground floor level of commercial and housing above. In other words, this analysis assumes that each vacant or part-vacant tax lot that is zoned for commercial or service

related employment growth (e.g., future retail or office uses) will be developed as mixed use with commercial on the ground level and upper-level housing.

As such, the Canby buildable land inventory includes the vacant and part-vacant mixed-use zoned tax lots in both the employment land and residential land inventory counts.

Exhibit 21: Employment Land Needs Forecast, Canby UGB

	Office	Government	Flex/Bus. Park	Gen. Industrial	Warehouse/ Dist.	Retail/ Service
Refill Job Allocation [1]	5%	20%	0%	0%	0%	5%
Jobs Needing Vacant Land Allocation [2]	83%	80%	90%	95%	100%	95%
Building SF Per Job [2]	250	750	550	1,000	1,500	500
Floor-Area-Ratio [2]	0.35	0.20	0.25	0.25	0.20	0.35
Public Facility Net:Gross Adjustment [3]	1.25	1.25	1.25	1.25	1.25	1.25
Work at Home Adjustment [4]	12%	0%	10%	5%	0%	0%

** assumptions are intended to reflect a long-term average and current local observations.*

1/ Adjusts for building refill & vacancy allowances.

2/ Building density consistent with local observations.

3/ Allowances take into account land dedicated to public/utility easements.

4/ Allowance based on local business license data; and is generally consistent with statistics by Oregon Emp. Dept.

Source: assumptions reflect local observations.

The assumptions used for estimating higher utilization of jobs within existing buildings (refill) and work-at-home allowances, which result in an adjusted (lower) number of total jobs that are projected to require vacant land than would otherwise occur. As shown in **Exhibit 22**, the Canby EOA assumes that approximately 12% of future jobs would not require development of vacant land as a result of potential building refill and work-at-home assumptions, and planned occupancy of new buildings that were currently under construction as of January 1, 2023.

The forecasted number of jobs that would require vacant land ranges from: 2,852 (low growth scenario; 5,963 (medium growth scenario); and 6,640 (high growth scenario).

Exhibit 22: Canby Jobs Requiring Vacant Land

	Low	Medium	High
Industrial	2,238	5,632	5,932
Retail	182	204	243
Services	829	914	1,374
Government & Education	20	27	27
Total Job Growth	3,270	6,778	7,576
Proj. Jobs not requiring vacant land*	418	815	936
Proj. Jobs on Vacant Land	**2,852**	**5,963**	**6,640**

** reflects jobs accommodated through refill in existing buildings and home-based workers.*

Vacant Land Needs

The resulting employment land needs for the Canby UGB range from 265 acres (low growth scenario), 626 acres (medium growth scenario), and 672 acres (high growth scenario) of gross buildable (unconstrained land area). As shown in **Exhibit 23**, the employment land needs by general

land use type range from 244 to 638 acres for industrial (includes land zoned CM, LI or HI); 20.5 to 33.9 acres for commercial (land zoned CD, HC or Mixed Use). These land demand forecasts assume 2 acres of land will be required for civic uses such as police and fire stations (excludes parks and schools).

Exhibit 23: Employment Land Needs Forecast, Canby UGB

Land Use Classification	Land Need (Demand)*		
	Low	Medium	High
Commercial (DC, HC)	20.5	24.7	33.9
Industrial/Other Emp. (CM, LI, HI)*	244.4	601.5	637.8
Total Buildable Land (gross acres)	**264.9**	**626.2**	**671.6**

** excludes potential public land needs for new parks and schools.*

Excluding public/education, the current overall employment density within Canby is estimated at 14.3 jobs per net buildable acre on developed land zoned for employment uses.

Based on the employment job growth and related land need forecast, the overall employment density within Canby will increase over time. Again, after excluding public/education, the future level of employment density for net new job growth over the next 20 years is estimated to range from 14.4 to 15 jobs per net buildable acre in the medium to higher growth scenarios.[1]

[1] Analysis of existing conditions assumes 7,576 private jobs on 527 developed acres zoned for commercial and industrial development in Canby (equates to 14.3 jobs per net acre). Future growth estimates for medium and high growth scenarios assume 6,751 to 7,522 private jobs are added over the next 20 years, requiring 468 to 503 net buildable acres (excludes public facilities) which equates to 14.4 to 15.0 jobs per net acre.

Section V. BUILDABLE LAND INVENTORY & SITE SUITABILITY ANALYSIS

The BLI findings for the Canby UGB were documented by 3J Consulting and updated as of October 21, 2022. The BLI findings reflect all vacant and part-vacant land within the Canby UGB that has not yet been developed nor has been issued a building permit as of January 1, 2023.

The BLI findings reflect current zoning categories that allow employment uses. This includes land that is with Comprehensive Plan designations as follows: Downtown Commercial, Commercial/Manufacturing, Highway Commercial, Heavy Industrial and Light Industrial. As shown in **Exhibit 24** (with supporting BLI methodology provided in **Appendix E**), the total remaining BLI includes 179 acres of unconstrained land area within vacant, part vacant and redevelopment lots. The light and heavy industrial land is pread over 48 separate tax lots, and commercial land is spread over 24 separate tax lots.

Exhibit 24: Vacant, Part Vacant and Redevelopable Employment Land, Canby UGB

Comprehensive Plan Category	Developed Land	Permitted	Pipeline	Buildable*	Constrained**	Total
DC - Downtown Commercial	35	0	0	1	0	36
CM - Commercial/Manufacturing	67	0	1	7	0	76
HC - Highway Commercial	67	0	0	12	2	82
HI - Heavy Industrial	67	0	0	26	1	94
LI - Light Industrial	282	14	80	51	1	428
Total	**519**	**14**	**82**	**97**	**5**	**716**

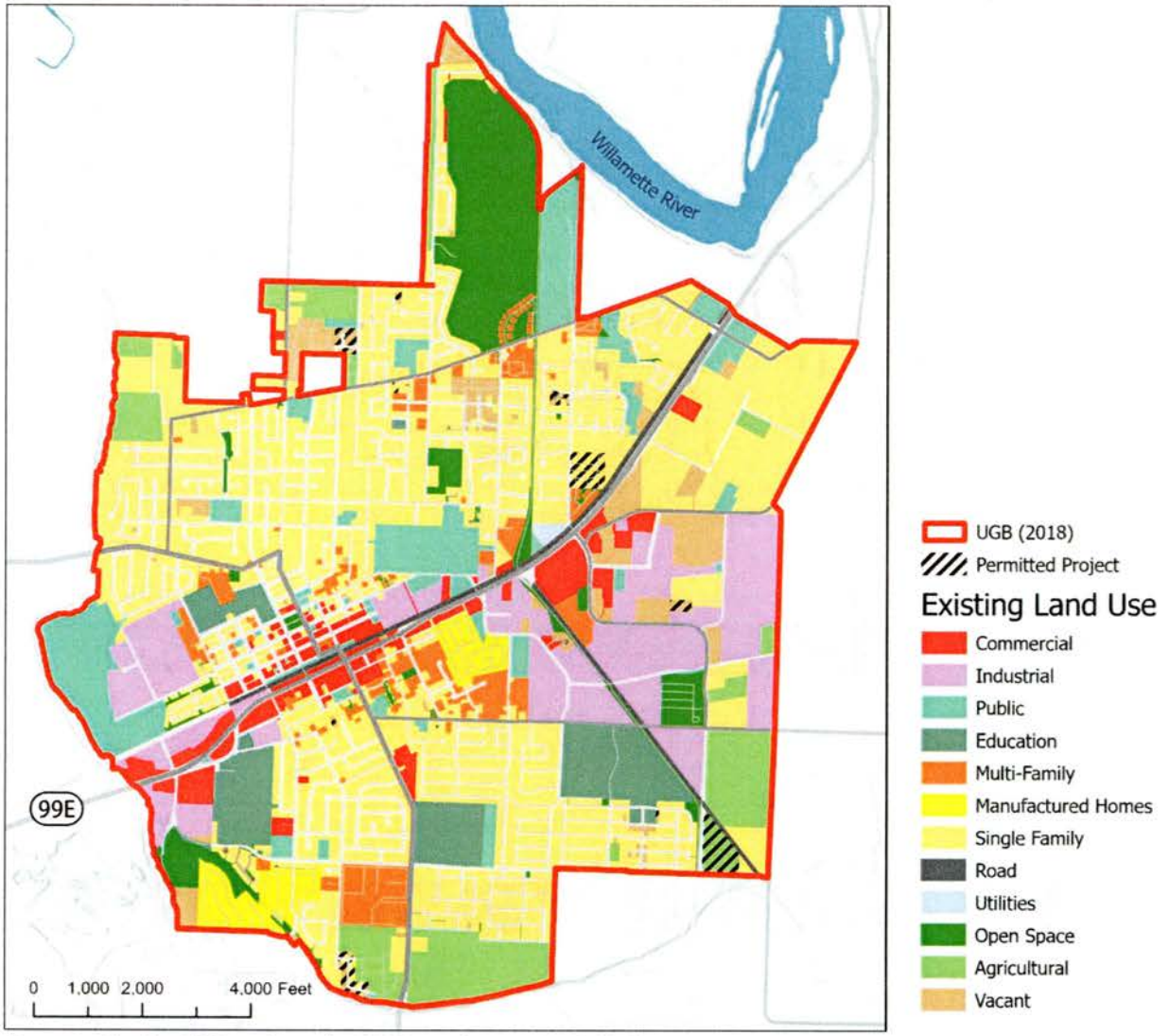
Comprehensive Plan Category	Developed Land*	Buildable Vacant	Constrained Vacant	Buildable Part Vacant	Redevelopment	Total Buildable
RC - Residential Commercial	14	0	0	5	0	6
DC - Downtown Commercial	35	1	0	0	0	1
CM - Commercial/Manufacturing	67	6	0	3	0	8
HC - Highway Commercial	67	10	2	0	2	9
HI - Heavy Industrial	67	16	1	9	0	24
LI - Light Industrial	296	96	1	26	9	131
Total	**547**	**129**	**5**	**43**	**12**	**179**

Source: Canby Buildable Land Inventory; 3J Consulting, March 2023.

As shown in **Exhibits 25 and 26,** most of the remaining vacant commercial tax lots are located along Highway 99E and in downtown.

The majority of the remaining commercial land supply is concentrated in tax lots that have less than 5 acres of unconstrained land area. The commercial inventory includes 5 tax lots with 1-5 acres each, and 19 tax lots within less than 1 acre of buildable land area. Approximately 83% of the commercial land area is classified as vacant and the remainder is classified as redevelopable.

Exhibit 25: Canby UGB Existing Land Use



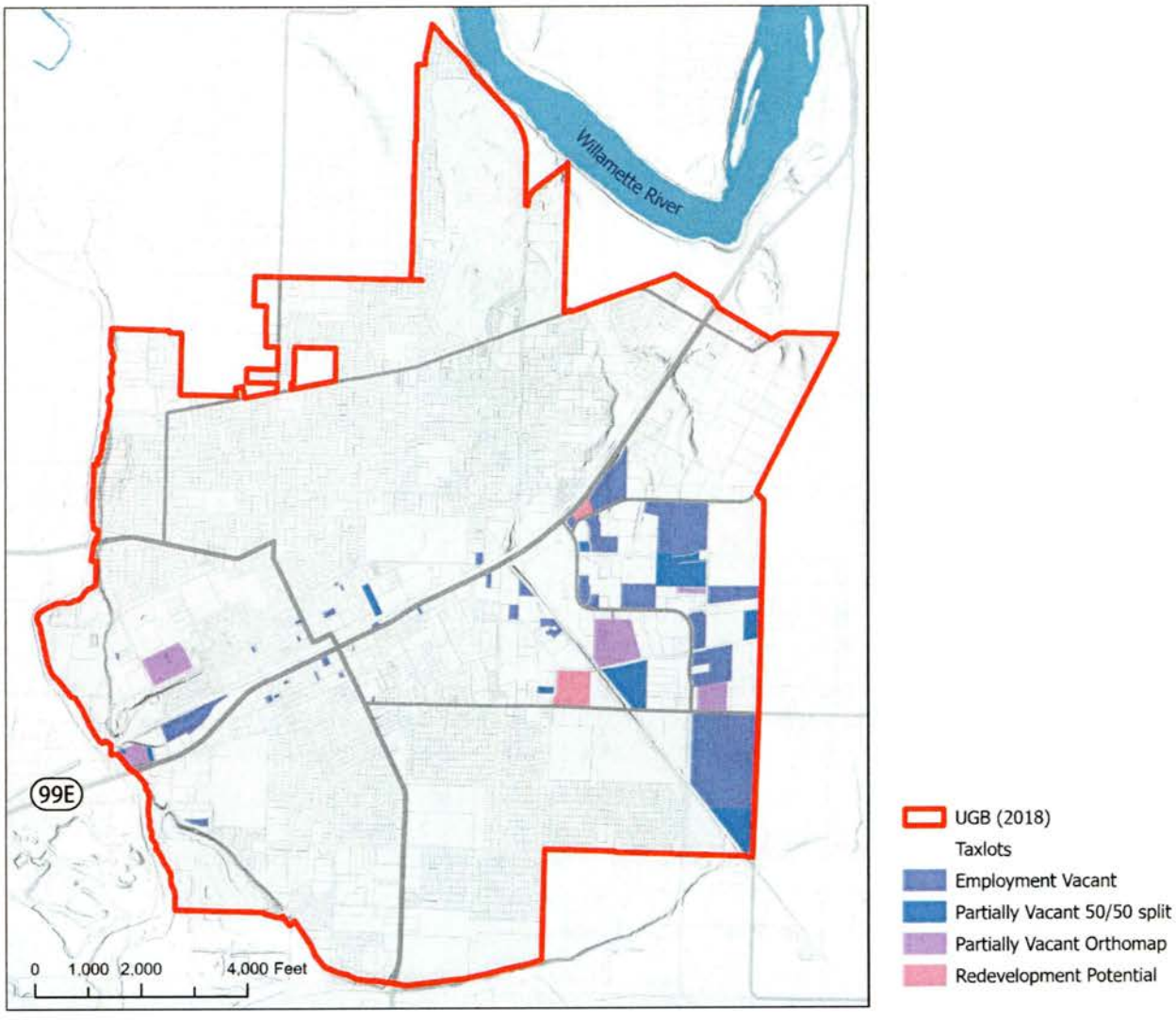
Source: Canby GIS analysis by 3J Consulting, April 2023.

Most of the remaining industrial land inventory is concentrated in the Pioneer Business Park. There are also a few vacant industrial tax lots located north of Highway 99E.

At present there are three (3) remaining vacant industrial tax lot with over 10 acres each of unconstrained land area; and eight (8) tax lots each with between 5 and 10 acres of land area. There are an additional 11 tax lots each with 1 to 5 acres of land area; and 26 tax lots with under 1 acre of land area.

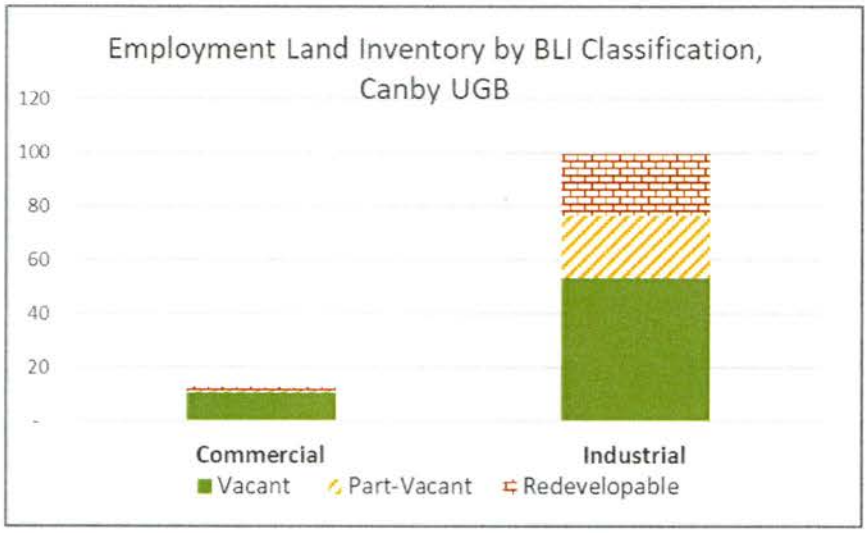
Approximately half of the remaining industrial land inventory is classified as vacant and unconstrained; 25% is classified as part-vacant; and 25% is classified as redevelopable (see **Exhibit 26**).

Exhibit 26: Canby UGB Buildable Employment Land Inventory



Source: Canby GIS analysis by 3J Consulting, April 2023.

Exhibit 27: Buildable Land by Classification



SITE SUITABILITY ANALYSIS

The site suitability analysis compares the remaining buildable land inventory to the projected employment land needs based on market factors detailed above.

As part of the EOA update, it has been determined that all remaining buildable employment lands within the Canby UGB can reasonably be served by planned investments in public and private facilities and services, such as roads, water, sewer, storm, power and telecommunications.

The commercial land use demand is derived from retail, service and office jobs that require new floor area on buildable land zoned CD or HC. The industrial land use demand forecast will be derived from jobs in manufacturing, construction, wholesale trade, transportation, distribution and utilities sectors on land zoned CM, LI or HI).

Exhibit 28: Canby Employment Land Need Forecast

Canby UGB Employment Land Needs (gross buildable unconstrained acres)

Comp. Plan Designation	Land Supply*	Land Need (Demand)**			Land Need (Shortfall)		
		Low	Medium	High	Low	Medium	High
Commercial (RC, DC, HC)	16.4	20.5	24.7	33.9	(4.1)	(8.3)	(17.5)
Industrial/Other Emp. (CM, LI, HI)*	163.0	244.4	601.5	637.8	(81.4)	(438.5)	(474.8)
Total Buildable Land (gross acres)	**179.4**	**264.9**	**626.2**	**671.6**	**(85.5)**	**(446.8)**	**(492.2)**

** Includes projects in the development pipeline that have no building permit issued as of Jan. 1, 2023.*

*** Excludes potential public land needs for new parks and schools.*

Site location, size and infrastructure requirements are important factors to consider when addressing the employment land needs. **Exhibit 29** identifies most likely site requirements under the middle and high employment growth scenarios.

Exhibit 29: Employment Site Requirements, Middle and High Growth Scenarios

	Very Small Users	Small Users	Medium Users	Large Users	Total
Assumed Jobs On Site (annual average)	Less than 9	10 to 25	26 to 99	100 to 200+	
Proj. Avg. Jobs per Establishment	7 jobs	15 jobs	80 jobs	185 jobs	
Proj. Distribution of Job Growth Capture	24%	21%	27%	28%	100%
Proj. Jobs on Vacant Land: Middle Scenario	1,431 jobs	1,252 jobs	1,610 jobs	1,670 jobs	**5,963 jobs**
Proj. Jobs on Vacant Land: High Scenario	1,594 jobs	1,394 jobs	1,793 jobs	1,859 jobs	**6,640 jobs**
Avg. Site Size per Estab. (net acres)	0.25	1.75	8	15	
Proj. Vacant Land: Middle Scenario (acres)	51.1	146.1	161.0	135.4	**494**
Proj. Vacant Land: High Scenario	56.9	162.7	179.3	150.7	550
Proj. Distribution of Land Needs	20%	20%	35%	25%	100%
Total Sites Needed: Middle Scenario (sites)	204	83	20	9	**317**
Total Sites Needed: High Scenario (sites)	228	93	22	10	**353**
Industrial Capture (sites)	10%	90%	95%	95%	
Industrial Sites Needed: Middle Scenario	20	75	19	9	**123**
Industrial Sites Needed: High Scenario	23	84	21	10	**137**
Commercial Capture (sites)	90%	10%	5%	5%	
Commerical Sites Needed: Middle Scenario	184	8	1	0	**194**
Commercial Sites Needed: High Scenario	205	9	1	1	**216**

Commercial and Office Land Need Requirements

With a long-term land demand forecast of 22 to 35 acres for commercial retail and office land needs (middle and high growth scenarios) and with a buildable land supply of 17 acres of commercial zoned land inside the existing UGB, Canby should explore new strategies to plan and annex appropriate locations for office and retail development.

Canby's short-term buildable land supply should be adequate in meeting market demand over the next 12 months. However, over the long-term, the City may need approximately 5 to 18 acres of additional land area for commercial and office development.

Possible long-term strategies include completing master planning on adjacent planning areas, such as the Area J planning area for a combination of office, commercial and housing development. A portion of the Area J planning area will be needed to address Canby's long-term employment land need.

In light of the fact that the remaining land supply within the City is primarily comprised of smaller tax lots (only 5 vacant commercial tax lots exist with over 1 acre in size), the City should explore strategies that support "special site" preferences for strategic uses, such as a new neighborhood shopping center, lifestyle center, hotel(s), and a medical/health campus that typically require sites ranging from 4-8 acres in size.

A forecast of site needs for commercial-zoned land in Canby is provided in **Exhibit 30**.

Exhibit 30: Commercial Site Requirements, Middle and High Growth Scenarios

Commercial	Very Small Users	Small Users	Medium Users	Large Users	Total
Jobs on Site (average)	*7 jobs*	*15 jobs*	*80 jobs*	*185 jobs*	
Range in Site Size (net buildable acres)	Less than 1.0	1 to 3	3 to 10	11 to 20	
Avg. Site Size (net buildable acres)	0.25	1.75	8	15	
Land Supply (Sites or Tax Lots)	**19**	**5**	**0**	**0**	**24**
Total Land Demand (Sites or Tax Lots)					
Middle Growth Forecast Scenario	184	8	1	0	**194**
High Growth Forecast Scenario	205	9	1	1	**216**
Difference: Site Surplus or (Shortfall)*					
Middle Growth Forecast Scenario (sites/tax lots)	**(179)**	**(3)**	**(1)**	**(0)**	
High Growth Forecast Scenario (sites/tax lots)	**(200)**	**(4)**	**(1)**	**(1)**	
Total Building Floor Area Needed					
Middle Growth Forecast Scenario	**- 451,000 SF**	**- 44,000 SF**	**- 28,000 SF**	**- 29,000 SF**	**- 552,000 SF**
High Growth Forecast Scenario	**- 502,000 SF**	**- 49,000 SF**	**- 31,000 SF**	**- 33,000 SF**	**- 615,000 SF**

** Number of sites reflects 20-year demand by individual establishments or tenants.*

Industrial and Other Land Need Requirements

The Canby EOA indicates that the total long-term demand for industrial and other employment uses is expected to range from 265 to 672 acres of gross buildable land area. While the City appears to have an adequate short-term industrial/other land supply to meet demand, the long-term needs under all growth forecast scenarios would require the City to consider designating some land within the current UGB for employment and/or evaluating additional reserves for UGB expansion.

It is recommended that the EOA policies consider whether special site requirements are needed over the long-term that would require additional land area to be annexed in locations to accommodate large industrial uses that cannot be located on existing or planned industrial areas. A forecast of site needs for commercial-zoned land in Canby is provided in **Exhibit 31**.

Exhibit 31: Industrial Site Requirements, Middle and High Growth Scenarios

Industrial	Very Small Users	Small Users	Medium Users	Large Users	Total
Jobs on Site (average)	*7 jobs*	*15 jobs*	*80 jobs*	*185 jobs*	
Range in Site Size (buildable acres)	Less than 1.0	1 to 3	3 to 10	11 to 20	
Avg. Site Size (net buildable acres)	0.25	1.75	8	15	
Land Supply (Sites or Tax Lots)	**26**	**11**	**8**	**3**	**48**
Land Demand (Sites or Tax Lots)					
Middle Growth Forecast Scenario	20	75	19	9	**123**
High Growth Forecast Scenario	23	84	21	10	**137**
Difference: Site Surplus or (Shortfall)*					
Middle Growth Forecast Scenario (sites/tax lots)	**6**	**(64)**	**(11)**	**(6)**	
High Growth Forecast Scenario (sites/tax lots)	**3**	**(73)**	**(13)**	**(7)**	

** Number of sites reflects 20-year demand by individual establishments or tenants.*

Section VI. Community Economic Development Objectives

As part of this EOA planning process, the City and consultant team conducted a communitywide survey, community and business stakeholder interviews and public meetings and a City Council work session. Three separate meetings were conducted with the Canby EOA project advisory committee to obtain input and feedback on interim work products. This outreach resulted in input from a wide range of perspectives—community residents, local businesses, workforce training specialists, and policy officials.

A summary of community feedback is included in **Appendix B**.

Going forward it is recommended that a new Economic Development Mission be adopted along with current aspirations to build a stronger local economy for all residents, employers, and employees. The following statements will be subject to community review and refinement during the EOA adoption process, and subsequently incorporated into a new Comprehensive Plan for Canby during 2023.

Community Development Mission Statement

Canby shall retain and enhance its unique sense of community and livable neighborhoods. Canby continues to be a great location for businesses to thrive and expand. Canby's downtown is inviting and safe, with innovative businesses that meet the community's needs. Canby's employment centers attract a diverse mix of businesses that offer quality jobs and benefits.[2] The Highway 99E Corridor is designed as a safe and attractive gateway that invites visitors to explore Canby. The City of Canby proactively plans for and invests wisely in infrastructure and services that enable the community to manage growth in a sustainable manner.

[2] Quality jobs are hereby defined to include businesses that pay annual wages that are above the Clackamas County average with health benefits provided to their workers.

Community Development Objectives

1. **Enhance Canby's positive business environment with adequate commercial, industrial and mixed-use sites to address future growth opportunities.**
    - Develop local plans to support the "medium growth scenario" as described in the Canby EOA.
    - Foster a positive business environment and permitting process.
2. **Plan for Industrial expansion areas east and north of Mulino Rd.**
    - Plan for Industrial Expansion Areas adjacent to the industrial park. Adjust UGB and modify boundary of the Pioneer Business Park as part of a UGB expansion alternatives analysis.
    - Identify and construct transportation and infrastructure improvements that serve Business Park expansion.
3. **Retain and attract businesses that provide quality jobs with high levels of employment per acre**
    - Consider methods to advance public financing and funding for off-site infrastructure improvements needed to support business expansion for businesses that provide at least 8 jobs per acre.
4. **Provide incentives for targeted job creation and major private investment**
    - Support reasonable business incentive programs, offered by Business Oregon such as the Strategic Investment Program that provides limited tax abatement for major private investments.
    - Sponsor annual business summit meetings and events held by the Canby Chamber of Commerce.
5. **Support expansion in health services**
    - Work with local and regional health care providers to ensure that additional outpatient treatment facilities are available as the local population expands.
6. **Support workforce training and development**
    - Work with the Clackamas Workforce Partnership to connect workforce training opportunities and programs with local community residents and businesses.
7. **Expand opportunities for the development of workforce housing**
    - Update Canby's Housing Needs Analysis and conduct a Housing Production Strategy during 2023.

- Evaluate and implement code amendments that lower the barrier to the development of middle housing types, such as plexes, courtyard apartments and accessory dwelling units.

8. Expand lodging options

- Identify potential locations for a future hotel along Highway 99W.
- Help facilitate partnerships between landowners and hotel operators.

9. Fund roads and infrastructure using innovative techniques

- Update local system development charges to fully fund capacity expansion projects.
- Implement equitable transportation utility revenue generation that fully captures the impacts created by various business and industrial types and their impacts on local streets and related maintenance costs.
- Explore and create special assessments, such as local improvements districts to recapture the value created by major public or private investments in infrastructure.

10. Support arts & visitation, including agri- and bicycle-tourism

- Implement master plan projects that include trails, pathways, parks, river access, and camping/RV facilities.
- Work with community partners, such as the Canby Parks and Recreation Advisory Board and the Canby School District and other organizations to explore feasibility for a new sports complex.
- Evaluate feasibility for a new amphitheater.
- Expand funding resources and attract state grants.

11. Attract downtown redevelopment with integrated mixed-use buildings

- Ensure downtown Canby remains visually and functionally attractive.
- Evaluate opportunities to incentivize vertical mixed-use developments using techniques such as public parking, advance financing of off-site infrastructure and limited multifamily tax abatement.

12. Update design standards and provide incentives for building renovations

- Implement effective design standards in core area and along Highway 99W.
- Create development codes which promote attractive highway commercial development servicing the needs of the community.
- Use the anticipated comprehensive plan and transportation system plan to establish goals to be used in creating future development code standards that will promote business consistent with design standards.

13. Think Regional and Act Local

- Support, monitor and participate in local and regional economic development organization activities that help Canby define its role within the larger region. Examples include Canby Chamber of Commerce, Clackamas County Economic Development Commission, and Greater Portland Inc.
- Play an active role in regional and state-sponsored economic planning processes to ensure that local business expansion needs are fully understood and can be addressed within the broader market area, if not within the Canby UGB.

APPENDIX A: GOAL 9 OREGON ADMINISTRATIVE RULES

(OAR 660-009-000)

660-009-0000
Intent and Purpose

The intent of the Land Conservation and Development Commission is to provide an adequate land supply for economic development and employment growth in Oregon. The intent of this division is to link planning for an adequate land supply to infrastructure planning, community involvement and coordination among local governments and the state. The purpose of this division is to implement Goal 9, Economy of the State (OAR 660-015-0000(9)), and ORS 197.712(2)(a) to (d). This division responds to legislative direction to assure that comprehensive plans and land use regulations are updated to provide adequate opportunities for a variety of economic activities throughout the state (ORS 197.712(1)) and to assure that comprehensive plans are based on information about state and national economic trends (ORS 197.717(2)).

Statutory/Other Authority: ORS 183 & 197
Statutes/Other Implemented: ORS 197.712
History:
LCDD 7-2005, f. 12-13-05, cert. ef. 1-1-07
LCDC 4-1986, f. & ef. 10-10-86

660-009-0005
Definitions

For purposes of this division, the definitions in ORS chapter 197 and the statewide planning goals apply, unless the context requires otherwise. In addition, the following definitions apply:

(1) "Developed Land" means non-vacant land that is likely to be redeveloped during the planning period.

(2) "Development Constraints" means factors that temporarily or permanently limit or prevent the use of land for economic development. Development constraints include, but are not limited to, wetlands, environmentally sensitive areas such as habitat, environmental contamination, slope, topography, cultural and archeological resources, infrastructure deficiencies, parcel fragmentation, or natural hazard areas.

(3) "Industrial Use" means employment activities generating income from the production, handling or distribution of goods. Industrial uses include, but are not limited to: manufacturing; assembly; fabrication; processing; storage; logistics; warehousing; importation; distribution and transshipment; and research and development. Industrial uses may have unique land, infrastructure, energy, and transportation requirements. Industrial uses may have external impacts on surrounding uses and may cluster in traditional or new industrial areas where they are segregated from other non-industrial activities.

(4) "Locational Factors" means market factors that affect where a particular type of industrial or other employment use will locate. Locational factors include, but are not limited to, proximity to raw materials, supplies, labor, services, markets, or educational institutions; access to transportation and freight facilities such as rail, marine ports and airports, multimodal freight or transshipment facilities, and major transportation routes; and workforce factors (e.g., skill level, education, age distribution).

(5) "Metropolitan Planning Organization (MPO)" means an organization designated by the Governor to coordinate transportation planning on urban land of the state including such designations made subsequent to the adoption of this division. The Longview-Kelso-Rainier MPO is not considered an MPO for the purposes of this division. Cities with less than 2,500 population are not considered part of an MPO for purposes of this division.

(6) "Other Employment Use" means all non-industrial employment activities including the widest range of retail, wholesale, service, non-profit, business headquarters, administrative and governmental employment activities that are accommodated in retail, office and flexible building types. Other employment uses also include employment activities of an entity or organization that serves the medical, educational, social service, recreation and security needs of the community typically in large buildings or multi-building campuses.

(7) "Planning Area" means the area within an existing or proposed urban growth boundary. Cities and counties with urban growth management agreements must address the urban land governed by their respective plans as specified in the urban growth management agreement for the affected area.

(8) "Prime Industrial Land" means land suited for traded-sector industries as well as other industrial uses providing support to traded-sector industries. Prime industrial lands possess site characteristics that are difficult or impossible to replicate in the planning area or region. Prime industrial lands have necessary access to transportation and freight infrastructure, including, but not limited to, rail, marine ports and airports, multimodal freight or transshipment facilities, and major transportation routes. Traded-sector has the meaning provided in ORS 285B.280.

(9) "Serviceable" means the city or county has determined that public facilities and transportation facilities, as defined by OAR 660, divisions 011 and 012, currently have adequate capacity for development planned in the service area where the site is located or can be upgraded to have adequate capacity within the 20-year planning period.

(10) "Short-term Supply of Land" means suitable land that is ready for construction within one year of an application for a building permit or request for service extension. Engineering feasibility is sufficient to qualify land for the short-term supply of land. Funding availability is not required. "Competitive Short-term Supply" means the short-term supply of land provides a range of site sizes and locations to accommodate the market needs of a variety of industrial and other employment uses.

(11) "Site Characteristics" means the attributes of a site necessary for a particular industrial or other employment use to operate. Site characteristics include, but are not limited to, a minimum acreage or site configuration including shape and topography, visibility, specific types or levels of public facilities, services or energy infrastructure, or proximity to a particular transportation or freight facility such as rail, marine ports and airports, multimodal freight or transshipment facilities, and major transportation routes.

(12) "Suitable" means serviceable land designated for industrial or other employment use that provides, or can be expected to provide the appropriate site characteristics for the proposed use.

(13) "Total Land Supply" means the supply of land estimated to be adequate to accommodate industrial and other employment uses for a 20-year planning period. Total land supply includes the short-term supply of land as well as the remaining supply of lands considered suitable and serviceable for the industrial or other employment uses identified in a comprehensive plan. Total land supply includes both vacant and developed land.

(14) "Vacant Land" means a lot or parcel:

(a) Equal to or larger than one half-acre not currently containing permanent buildings or improvements; or

(b) Equal to or larger than five acres where less than one half-acre is occupied by permanent buildings or improvements.

Statutory/Other Authority: ORS 183 & 197
Statutes/Other Implemented: ORS 197.712
History:
LCDD 7-2005, f. 12-13-05, cert. ef. 1-1-07
LCDC 4-1986, f. & ef. 10-10-86

660-009-0010
Application

(1) This division applies to comprehensive plans for areas within urban growth boundaries. This division does not require or restrict planning for industrial and other employment uses outside urban growth boundaries. Cities and counties subject to this division must adopt plan and ordinance amendments necessary to comply with this division.

(2) Comprehensive plans and land use regulations must be reviewed and amended as necessary to comply with this division as amended at the time of each periodic review of the plan pursuant to ORS 197.712(3). Jurisdictions that have received a periodic review notice from the Department (pursuant to OAR 660-025-0050) prior to the effective date of amendments to this division must comply with such amendments at their next periodic review unless otherwise directed by the Commission.

(3) Cities and counties may rely on their existing plans to meet the requirements of this division if they conclude:

(a) There are not significant changes in economic development opportunities (e.g., a need for sites not presently provided for in the plan) based on a review of new information about national, state, regional, county and local trends; and

(b) That existing inventories, policies, and implementing measures meet the requirements in OAR 660-009-0015 to 660-009-0030.

(4) For a post-acknowledgement plan amendment under OAR chapter 660, division 18, that changes the plan designation of land in excess of two acres within an existing urban growth boundary from an industrial use designation to a non-industrial use designation, or an other employment use designation to any other use designation, a city or county must address all applicable planning requirements, and:

(a) Demonstrate that the proposed amendment is consistent with its most recent economic opportunities analysis and the parts of its acknowledged comprehensive plan which address the requirements of this division; or

(b) Amend its comprehensive plan to incorporate the proposed amendment, consistent with the requirements of this division; or

(c) Adopt a combination of the above, consistent with the requirements of this division.

(5) The effort necessary to comply with OAR 660-009-0015 through 660-009-0030 will vary depending upon the size of the jurisdiction, the detail of previous economic development planning efforts, and the extent of new information on national, state, regional, county, and local economic trends. A jurisdiction's planning effort is adequate if it uses the best available or readily collectable information to respond to the requirements of this division.

(6) The amendments to this division are effective January 1, 2007. A city or county may voluntarily follow adopted amendments to this division prior to the effective date of the adopted amendments.

Statutory/Other Authority: ORS 183 & 197
Statutes/Other Implemented: ORS 197.712
History:
LCDD 7-2005, f. 12-13-05, cert. ef. 1-1-07
LCDD 4-2001, f. & cert. ef. 10-2-01
LCDC 4-1986, f. & ef. 10-10-86

660-009-0015
Economic Opportunities Analysis

Cities and counties must review and, as necessary, amend their comprehensive plans to provide economic opportunities analyses containing the information described in sections (1) to (4) of this rule. This analysis will compare the demand for land for industrial and other employment uses to the existing supply of such land.

(1) Review of National, State, Regional, County and Local Trends. The economic opportunities analysis must identify the major categories of industrial or other employment uses that could reasonably be expected to locate or expand in the planning area based on information about national, state, regional, county or local trends. This review of trends is the principal basis for estimating future industrial and other employment uses as described in section (4) of this rule. A use or category of use could reasonably be expected to expand or locate in the planning area if the area possesses the appropriate locational factors for the use or category of use. Cities and counties are strongly encouraged to analyze trends and establish employment projections in a geographic area larger than the planning area and to determine the percentage of employment growth reasonably expected to be captured for the planning area based on the assessment of community economic development potential pursuant to section (4) of this rule.

(2) Identification of Required Site Types. The economic opportunities analysis must identify the number of sites by type reasonably expected to be needed to accommodate the expected employment growth based on the site characteristics typical of expected uses. Cities and counties are encouraged to examine existing firms in the planning area to identify the types of sites that may be needed for expansion. Industrial or other employment uses with compatible site characteristics may be grouped together into common site categories.

(3) Inventory of Industrial and Other Employment Lands. Comprehensive plans for all areas within urban growth boundaries must include an inventory of vacant and developed lands within the planning area designated for industrial or other employment use.

(a) For sites inventoried under this section, plans must provide the following information:

(A) The description, including site characteristics, of vacant or developed sites within each plan or zoning district;

(B) A description of any development constraints or infrastructure needs that affect the buildable area of sites in the inventory; and

(C) For cities and counties within a Metropolitan Planning Organization, the inventory must also include the approximate total acreage and percentage of sites within each plan or zoning district that comprise the short-term supply of land.

(b) When comparing current land supply to the projected demand, cities and counties may inventory contiguous lots or parcels together that are within a discrete plan or zoning district.

(c) Cities and counties that adopt objectives or policies providing for prime industrial land pursuant to OAR 660-009-0020(6) and 660-009-0025(8) must identify and inventory any vacant or developed prime industrial land according to section (3)(a) of this rule.

(4) Assessment of Community Economic Development Potential. The economic opportunities analysis must estimate the types and amounts of industrial and other employment uses likely to occur in the planning area. The estimate must be based on information generated in response to sections (1) to (3) of this rule and must consider the planning area's economic advantages and disadvantages. Relevant economic advantages and disadvantages to be considered may include but are not limited to:

(a) Location, size and buying power of markets;

(b) Availability of transportation facilities for access and freight mobility;

(c) Public facilities and public services;

(d) Labor market factors;

(e) Access to suppliers and utilities;

(f) Necessary support services;

(g) Limits on development due to federal and state environmental protection laws; and

(h) Educational and technical training programs.

(5) Cities and counties are strongly encouraged to assess community economic development potential through a visioning or some other public input based process in conjunction with state agencies. Cities and counties are strongly encouraged to use the assessment of community economic development potential to form the community economic development objectives pursuant to OAR 660-009-0020(1)(a).

Statutory/Other Authority: ORS 183 & 197
Statutes/Other Implemented: ORS 197.712
History:
LCDD 7-2005, f. 12-13-05, cert. ef. 1-1-07
LCDC 4-1986, f. & ef. 10-10-86

660-009-0020
Industrial and Other Employment Development Policies

(1) Comprehensive plans subject to this division must include policies stating the economic development objectives for the planning area. These policies must be based on the community economic opportunities analysis prepared pursuant to OAR 660-009-0015 and must provide the following:

(a) Community Economic Development Objectives. The plan must state the overall objectives for economic development in the planning area and identify categories or particular types of industrial and other employment uses desired by the community. Policy objectives may identify the level of short-term supply of land the planning area needs. Cities and counties are strongly encouraged to select a competitive short-term supply of land as a policy objective.

(b) Commitment to Provide a Competitive Short-Term Supply. Cities and counties within a Metropolitan Planning Organization must adopt a policy stating that a competitive short-term supply of land as a community economic development objective for the industrial and other employment uses selected through the economic opportunities analysis pursuant to OAR 660-009-0015.

(c) Commitment to Provide Adequate Sites and Facilities. The plan must include policies committing the city or county to designate an adequate number of sites of suitable sizes, types and locations. The plan must also include policies, through public facilities planning and transportation system planning, to provide necessary public facilities and transportation facilities for the planning area.

(2) Plans for cities and counties within a Metropolitan Planning Organization or that adopt policies relating to the short-term supply of land, must include detailed strategies for preparing the total land supply for development and for replacing the short-term supply of land as it is developed. These policies must describe dates, events or both, that trigger local review of the short-term supply of land.

(3) Plans may include policies to maintain existing categories or levels of industrial and other employment uses including maintaining downtowns or central business districts.

(4) Plan policies may emphasize the expansion of and increased productivity from existing industries and firms as a means to facilitate local economic development.

(5) Cities and counties are strongly encouraged to adopt plan policies that include brownfield redevelopment strategies for retaining land in industrial use and for qualifying them as part of the local short-term supply of land.

(6) Cities and counties are strongly encouraged to adopt plan policies pertaining to prime industrial land pursuant to OAR 660-009-0025(8).

(7) Cities and counties are strongly encouraged to adopt plan policies that include additional approaches to implement this division including, but not limited to:

(a) Tax incentives and disincentives;

(b) Land use controls and ordinances;

(c) Preferential tax assessments;

(d) Capital improvement programming;

(e) Property acquisition techniques;

(f) Public/private partnerships; and

(g) Intergovernmental agreements.

Statutory/Other Authority: ORS 183 & 197
Statutes/Other Implemented: ORS 197.712
History:
LCDD 7-2005, f. 12-13-05, cert. ef. 1-1-07
LCDC 4-1986, f. & ef. 10-10-86

660-009-0025

Designation of Lands for Industrial and Other Employment Uses

Cities and counties must adopt measures adequate to implement policies adopted pursuant to OAR 660-009-0020. Appropriate implementing measures include amendments to plan and zone map designations, land use regulations, public facility plans, and transportation system plans.

(1) Identification of Needed Sites. The plan must identify the approximate number, acreage and site characteristics of sites needed to accommodate industrial and other employment uses to implement plan policies. Plans do not need to provide a different type of site for each industrial or other employment use. Compatible uses with similar site characteristics may be combined into broad site categories. Several broad site categories will provide for industrial and other employment uses likely to occur in most planning areas. Cities and counties may also designate mixed-use zones to meet multiple needs in a given location.

(2) Total Land Supply. Plans must designate serviceable land suitable to meet the site needs identified in section (1) of this rule. Except as provided for in section (5) of this rule, the total acreage of land designated must at least equal the total projected land needs for each industrial or other employment use category identified in the plan during the 20-year planning period.

(3) Short-Term Supply of Land. Plans for cities and counties within a Metropolitan Planning Organization or cities and counties that adopt policies relating to the short-term supply of land must designate suitable land to respond to economic development opportunities as they arise. Cities and counties may maintain the short-term supply of land according to the strategies adopted pursuant to OAR 660-009-0020(2).

(a) Except as provided for in subsections (b) and (c), cities and counties subject to this section must provide at least 25 percent of the total land supply within the urban growth boundary designated for industrial and other employment uses as short-term supply.

(b) Affected cities and counties that are unable to achieve the target in subsection (a) above may set an alternative target based on their economic opportunities analysis.

(c) A planning area with 10 percent or more of the total land supply enrolled in Oregon's industrial site certification program pursuant to ORS 284.565 satisfies the requirements of this section.

(4) If cities and counties are required to prepare a public facility plan or transportation system plan by OAR chapter 660, division 011 or division 012, the city or county must complete subsections (a) to (c) of this section at the time of periodic review. Requirements of this rule apply only to city and county decisions made at the time of periodic review. Subsequent implementation of or amendments to the comprehensive plan or the public facility plan that change the supply of serviceable land are not subject to the requirements of this section. Cities and counties must:

(a) Identify serviceable industrial and other employment sites. The affected city or county in consultation with the local service provider, if applicable, must make decisions about whether a site is serviceable. Cities and counties are encouraged to develop specific criteria for deciding whether or not a site is serviceable. Cities and counties are strongly encouraged to also consider whether or not extension of facilities is reasonably likely to occur considering the size and type of uses likely to occur and the cost or distance of facility extension;

(b) Estimate the amount of serviceable industrial and other employment land likely to be needed during the planning period for the public facilities plan. Appropriate techniques for estimating land needs include but are not limited to the following:

(A) Projections or forecasts based on development trends in the area over previous years; and

(B) Deriving a proportionate share of the anticipated 20-year need specified in the comprehensive plan.

(c) Review and, if necessary, amend the comprehensive plan and the public facilities plan to maintain a short-term supply of land. Amendments to implement this requirement include but are not limited to the following:

(A) Changes to the public facilities plan to add or reschedule projects to make more land serviceable;

(B) Amendments to the comprehensive plan that redesignate additional serviceable land for industrial or other employment use; and

(C) Reconsideration of the planning area's economic development objectives and amendment of plan objectives and policies based on public facility limitations.

(d) If a city or county is unable to meet the requirements of this section, it must identify the specific steps needed to provide expanded public facilities at the earliest possible time.

(5) Institutional Uses. Cities and counties are not required to designate institutional uses on privately owned land when implementing section (2) of this rule. Cities and counties may designate land in an industrial or other employment land category to compensate for any institutional land demand that is not designated under this section.

(6) Compatibility. Cities and counties are strongly encouraged to manage encroachment and intrusion of uses incompatible with industrial and other employment uses. Strategies for managing encroachment and intrusion of incompatible uses include, but are not limited to, transition areas around uses having negative impacts on surrounding areas, design criteria, district designation, and limiting non-essential uses within districts.

(7) Availability. Cities and counties may consider land availability when designating the short-term supply of land. Available land is vacant or developed land likely to be on the market for sale or lease at prices consistent with the local real estate market. Methods for determining lack of availability include, but are not limited to:

(a) Bona fide offers for purchase or purchase options in excess of real market value have been rejected in the last 24 months;

(b) A site is listed for sale at more than 150 percent of real market values;

(c) An owner has not made timely response to inquiries from local or state economic development officials; or

(d) Sites in an industrial or other employment land category lack diversity of ownership within a planning area when a single owner or entity controls more than 51 percent of those sites.

(8) Uses with Special Siting Characteristics. Cities and counties that adopt objectives or policies providing for uses with special site needs must adopt policies and land use regulations providing for those special site needs. Special site needs include, but are not limited to large acreage sites, special site configurations, direct access to transportation facilities, prime industrial lands, sensitivity to adjacent land uses, or coastal shoreland sites designated as suited for water-dependent use under Goal 17. Policies and land use regulations for these uses must:

(a) Identify sites suitable for the proposed use;

(b) Protect sites suitable for the proposed use by limiting land divisions and permissible uses and activities that interfere with development of the site for the intended use; and

(c) Where necessary, protect a site for the intended use by including measures that either prevent or appropriately restrict incompatible uses on adjacent and nearby lands.

Statutory/Other Authority: ORS 183 & 197
Statutes/Other Implemented: ORS 197.712
History:
LCDD 7-2005, f. 12-13-05, cert. ef. 1-1-07
LCDC 4-1986, f. & ef. 10-10-86

660-009-0030
Multi-Jurisdiction Coordination

(1) Cities and counties are strongly encouraged to coordinate when implementing OAR 660-009-0015 to 660-009-0025.

(2) Jurisdictions that coordinate under this rule may:

(a) Conduct a single coordinated economic opportunities analysis; and

(b) Designate lands among the coordinating jurisdictions in a mutually agreed proportion.

APPENDIX B: COMMUNITY OUTREACH SUMMARY

The City of Canby has initiated a process to update its economic data and policies and identify tools to help encourage job growth.

The community outreach process entailed the following techniques:

- **EOA Advisory Committee Meetings**: three separate meetings were held between April 2022 and October 2022 to discuss key issues and opportunities; and to review interim findings and recommendations. The advisory committee included:
  - Kelly Reid and Leigh McIlvaine, Oregon Dept. of Land Conservation and Development
  - Cindy Moore, Economic Development Coordinator
  - Amy Oakley, Clackamas Workforce Partnership
  - Briana Correa, Todos Juntos, Inc.
  - Susan Myers, Developer Representative
  - Teresa Sasse, Puddin'River Chocolates
  - Brian Hodson, Canby Mayor
  - Jason Padden, Canby City Council

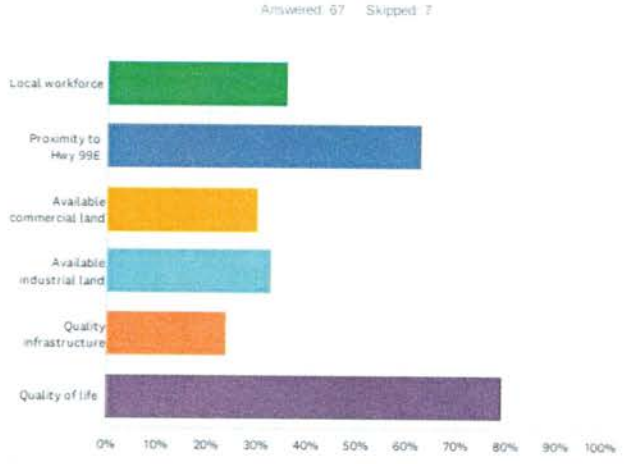
Input provided by the advisory committee served to address diverse local perspectives.

- **Joint City Council/Planning Commission Meeting**. This meeting was held in November 2022 to review and discuss draft findings and recommendations.
- **Stakeholder Interviews**. From April through October 2022, the consultant team interviewed key stakeholders such as local business owners, employers, and developers. Findings included:
  - Desire to provide additional light industrial and flex buildings.
  - Support for continued downtown development with adequate parking.
  - Support for a wide mix of employment sites for small, medium and large businesses.
  - Maintaining a positive business friendly environment with streamlined permitting for new business development.
  - Acknowledgement of the importance of adding attainable housing for people that work in Canby.
- **Community Survey**. An online survey was conducted during the Summer/Fall 2022. There were 70 responses to that survey, with responses summarized below.

Businesses Like...

1. Quality of Life
2. Hwy 99E
3. Local workforce
4. Available sites

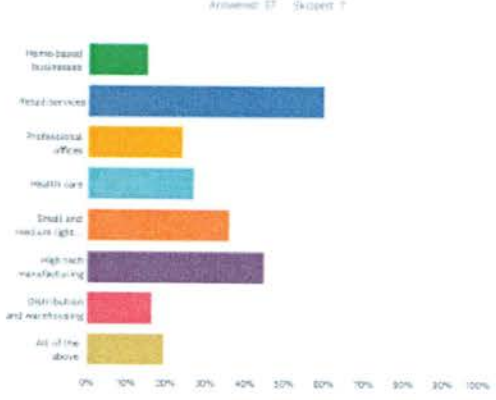
Q6 What are the top three advantages to doing business in Canby?



Types of businesses or jobs needed...

1. Retail/services
2. High tech jobs
3. Small & medium light industrial (flexible buildings)
4. Health services
5. Prof. Offices
6. Lodging
7. Recreational amenities

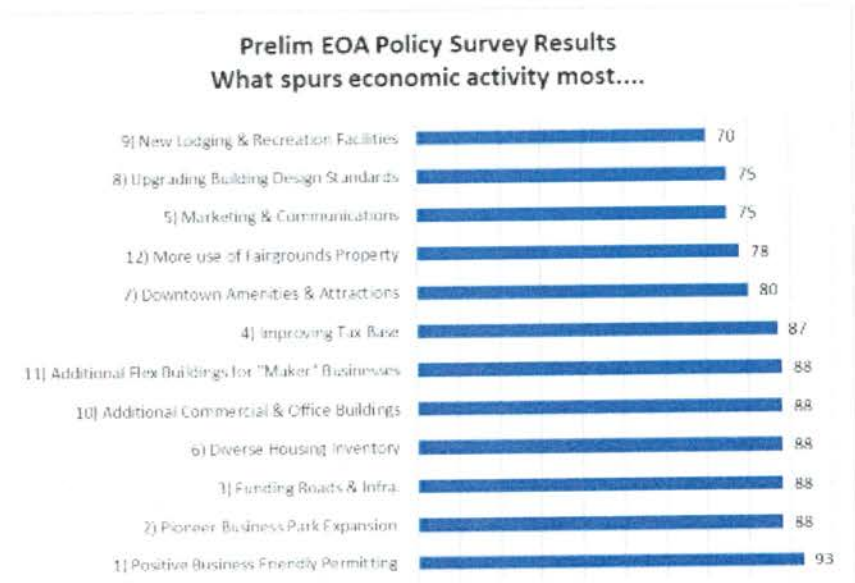
Q7 What are the top three business and jobs you think Canby needs the most?



Community dislikes…

1. Traffic congestion and anything that degrades quality of life
2. Lack of sidewalks & traffic control systems
3. Lack of attainable housing supply for workers
4. Lack of coordinated long term community master plan
5. Lack of quality design & landscaping standards
6. Warehousing & distribution businesses that pay low wages
7. Sprawl (low density development that is not pedestrian friendly)

EOA Advisory Committee Priorities



Objectives that will help promote local economic development

The input received during the EOA planning process was considered by the EOA Advisory Committee, City staff and City Council and utilized to help develop the recommended EOA goals, objectives, policies and actions identified in this document.

Appendix C. Regional Employment Growth Forecast

	2020	2030	Change	% Change
Total employment	**996,500**	**1,169,900**	**173,400**	**17%**
Total payroll employment	**937,000**	**1,105,400**	**168,400**	**18%**
Total private	825,000	981,600	156,600	19%
Natural resources and mining	10,200	10,900	700	7%
Mining and logging	600	600	0	0%
Construction	55,100	61,800	6,700	12%
Construction of buildings	15,800	17,700	1,900	12%
Residential building construction	8,200	9,500	1,300	16%
Nonresidential building construction	7,600	8,200	600	8%
Heavy and civil engineering construction	3,800	4,200	400	11%
Specialty trade contractors	35,500	39,900	4,400	12%
Manufacturing	99,100	109,400	10,300	10%
Durable goods	75,000	82,700	7,700	10%
Wood product manufacturing	2,100	2,100	0	0%
Primary metal manufacturing	4,500	5,100	600	13%
Fabricated metal product manufacturing	10,000	11,400	1,400	14%
Machinery manufacturing	7,900	9,000	1,100	14%
Computer and electronic product manufacturing	33,900	35,900	2,000	6%
Semiconductor and electronic component mfg.	28,000	29,700	1,700	6%
Electronic instrument manufacturing	4,200	4,700	500	12%
Transportation equipment manufacturing	5,800	6,900	1,100	19%
Nondurable goods	24,000	26,700	2,700	11%
Food manufacturing	10,800	12,300	1,500	14%
Paper manufacturing	1,700	1,700	0	0%
Trade, transportation, and utilities	177,700	200,100	22,400	13%
Wholesale trade	46,200	51,600	5,400	12%
Merchant wholesalers, durable goods	24,500	26,600	2,100	9%
Merchant wholesalers, nondurable goods	17,400	20,200	2,800	16%
Electronic markets and agents and brokers	4,300	4,800	500	12%
Retail trade	87,700	97,100	9,400	11%
Motor vehicle and parts dealers	10,600	12,400	1,800	17%
Building material and garden supply stores	6,900	7,400	500	7%
Food and beverage stores	19,000	20,700	1,700	9%
Clothing and clothing accessories stores	7,200	9,000	1,800	25%
Sporting goods, hobby, book and music stores	4,100	4,500	400	10%
General merchandise stores	16,900	17,500	600	4%
Transportation, warehousing, and utilities	43,700	51,400	7,700	18%
Transportation and warehousing	41,500	48,900	7,400	18%
Truck transportation	8,600	9,300	700	8%
Couriers and messengers	9,000	10,900	1,900	21%
Warehousing and storage	12,500	14,900	2,400	19%

Source: Oregon Employment Department, Workforce and Economics Research Division.
Contact: Amy Vander Vliet, Regional Economist, Amy.S.Vandervliet@employ.oregon.gov, (971) 804-2099
Oregon Employment Department, Workforce and Economic Research Division

	2020	2030	Change	% Change
Total employment	**996,500**	**1,169,900**	**173,400**	**17%**
Total payroll employment	**937,000**	**1,105,400**	**168,400**	**18%**
Total private	825,000	981,600	156,600	19%
Information	21,100	24,900	3,800	18%
Publishing industries, except Internet	10,100	11,500	1,400	14%
Software publishers	9,000	10,600	1,600	18%
Telecommunications	2,500	1,800	-700	-28%
Financial activities	61,600	66,700	5,100	8%
Finance and insurance	35,900	37,500	1,600	4%
Credit intermediation and related activities	15,300	15,900	600	4%
Insurance carriers and related activities	16,600	16,900	300	2%
Real estate and rental and leasing	25,700	29,200	3,500	14%
Real estate	23,000	26,000	3,000	13%
Professional and business services	155,400	186,300	30,900	20%
Professional and technical services	65,600	78,900	13,300	20%
Legal services	7,400	7,400	0	0%
Architectural and engineering services	12,600	14,700	2,100	17%
Computer systems design and related services	12,900	16,400	3,500	27%
Management of companies and enterprises	37,300	45,100	7,800	21%
Administrative and waste services	52,500	62,400	9,900	19%
Administrative and support services	49,800	59,000	9,200	18%
Employment services	21,700	26,900	5,200	24%
Business support services	5,500	5,200	-300	-5%
Services to buildings and dwellings	12,400	14,500	2,100	17%
Private educational and health services	140,000	168,600	28,600	20%
Private educational services	19,500	23,600	4,100	21%
Health care and social assistance	120,500	145,000	24,500	20%
Ambulatory health care services	43,700	54,200	10,500	24%
Hospitals	25,000	27,000	2,000	8%
Nursing and residential care facilities	22,700	27,000	4,300	19%
Social assistance	29,100	36,800	7,700	26%
Leisure and hospitality	72,400	113,100	40,700	56%
Arts, entertainment, and recreation	10,000	17,100	7,100	71%
Amusement, gambling, and recreation	6,800	12,000	5,200	76%
Accommodation and food services	62,500	95,900	33,400	53%
Accommodation	5,400	10,200	4,800	89%
Food services and drinking places	57,100	85,800	28,700	50%
Restaurants and other eating places	51,100	74,400	23,300	46%
Other services	32,400	39,800	7,400	23%
Membership associations and organizations	13,100	14,900	1,800	14%
Government	112,000	123,800	11,800	11%
Federal government	14,500	14,600	100	1%
Federal government post office	3,500	3,600	100	3%
State government	8,200	8,800	600	7%
Local government	89,300	100,400	11,100	12%
Local education	45,600	50,800	5,200	11%
Self-employment	**59,500**	**64,500**	**5,000**	**8%**

Source: Oregon Employment Department, Workforce and Economics Research Division.
Contact: Amy Vander Vliet, Regional Economist, Amy.S.Vandervliet@employ.oregon.gov, (971) 804-2099
Oregon Employment Department, Workforce and Economic Research Division

Appendix D. Employment Land Needs Assumptions

Canby UGB Net New Employment Forecast: 2023-2043*

	Low	Medium	High
Industrial	2,238	5,632	5,932
Retail	182	204	216
Services	737	914	1,374
Government & Education	20	24	24
Total Job Growth	3,178	6,775	7,546
Proj. Jobs not requiring vacant land*	403	815	934
Proj. Jobs on Vacant Land	**2,775**	**5,960**	**6,611**

* *reflects jobs accommodated through refill in existing buildings and home-based workers.*

Canby UGB Job Growth Capture Rates: 2023-2043

	Scenario A	Scenario B	Scenario C
Industrial	100%	100%	100%
Retail	100%	100%	100%
Services	100%	100%	100%
Government & Education	100%	100%	100%

Canby UGB Job Growth Forecast: 2023-2043

	Low	Medium	High
Industrial	2,238	5,632	5,932
Retail	182	204	216
Services	737	914	1,374
Government & Education	20	24	24
Total	**3,178**	**6,775**	**7,546**

Source: *Derived from prior tables*

Employment Sectors to Building Type Assignment Assumptions

	Building Types						
Employment Sectors	Office	Government	Flex/Bus. Park	Gen. Industrial	Warehouse	Retail	Total
Retail	0%		10%	0%	0%	90%	100%
Services	50%		20%	0%	0%	30%	100%
Industrial			30%	55%	15%	0%	100%
Government/Education/Other Public		100%		0%	0%		100%

Source: reflects local assumptions by FCS GROUP.

Net New Employment Forecast by Building Type, Scenario A Forecast

Employment Sectors	Office	Government	Flex/Bus. Park	Gen. Industrial	Warehouse	Retail	Total
Retail	-	-	18	-	-	164	182
Services	369	-	147	-	-	221	737
Industrial	-	-	671	1,231	336	-	2,238
Government/Other Public	-	20	-	-	-	-	20
Total	**369**	**20**	**837**	**1,231**	**336**	**385**	**3,178**

Net New Employment Forecast by Building Type, Scenario B Forecast

Employment Sectors	Office	Government	Flex/Bus. Park	Gen. Industrial	Warehouse	Retail	Total
Retail Trades	-	-	20	-	-	184	204
Services	457	-	183	-	-	274	914
Industrial	-	-	1,690	3,098	845	-	5,632
Government/Other Public	-	24	-	-	-	-	24
Total	**457**	**24**	**1,893**	**3,098**	**845**	**458**	**6,775**

Source: FCS GROUP based on local market assumptions.

Net New Employment Forecast by Building Type, Scenario C Forecast

Employment Sectors	Office	Government	Flex/Bus. Park	Gen. Industrial	Warehouse	Retail	Total
Retail Trades	-	-	22	-	-	194	216
Services	687	-	275	-	-	412	1,374
Industrial	-	-	1,780	3,263	890	-	5,932
Government/Other Public	-	24	-	-	-	-	24
Total	**687**	**24**	**2,076**	**3,263**	**890**	**606**	**7,546**

Source: FCS GROUP based on local market assumptions.

Building Type to Land Needs Assumptions*

	Office	Government	Flex/Bus. Park	Gen. Industrial	Warehouse/ Dist.	Retail/ Service
Refill Job Allocation [1]	5%	20%	0%	0%	0%	5%
Jobs Needing Vacant Land Allocation [2]	83%	80%	90%	95%	100%	95%
Building SF Per Job [2]	250	750	550	1,000	1,500	500
Floor-Area-Ratio [2]	0.35	0.20	0.25	0.25	0.20	0.35
Public Facility Net:Gross Adjustment [3]	1.25	1.25	1.25	1.25	1.25	1.25
Work at Home Adjustment [4]	12%	0%	10%	5%	0%	0%

** assumptions are intended to reflect a long-term average and current local observations.*

1/ Adjusts for building refill & vacancy allowances.

2/ Building density consistent with local observations.

3/ Allowances take into account land dedicated to public/utility easements.

4/ Allowance based on local business license data; and is generally consistent with statistics by Oregon Emp. Dept.

Source: assumptions reflect local observations.

Net New Refill Building Space Requirements (Floor Area Sq.Ft.)

	Office	Government	Flex/Bus. Park	Gen. Industrial	Warehouse	Retail	Total
Low	4,000	3,000	-	-	-	10,000	17,000
Medium	5,000	4,000	-	-	-	11,000	20,000
High	8,000	4,000	-	-	-	15,000	27,000

Net New Building Floor Area Development on Vacant Lands (Floor Area) - 20 Year Forcast

	Office	Government	Flex/Bus. Park	Gen. Industrial	Warehouse	Retail	Total
Low	67,000	12,000	373,000	1,111,000	504,000	183,000	2,250,000
Medium	83,000	14,000	843,000	2,796,000	1,267,000	218,000	5,221,000
High	125,000	14,000	925,000	2,945,000	1,335,000	288,000	5,632,000

Vacant Land Need (gross buildable acres) - 20 Year Forecast

	Office	Government	Flex/Bus. Park	Gen. Industrial	Warehouse	Retail	Total
Low	5.5	1.7	42.8	127.5	72.3	15.0	264.9
Medium	6.8	2.0	96.8	320.9	181.8	17.9	626.2
High	10.2	2.0	106.2	338.0	191.5	23.6	671.6

Building to Land Use Assignment Assumptions

Land Use Classification	Office	Government	Flex/Bus. Park	Gen. Industrial	Warehouse	Retail
Commercial (retail, office, lodging)	100%	0%	0%	0%	0%	100%
Mixed Use	0%	0%	0%	0%	0%	0%
Public	0%	100%	0%	0%	0%	0%
General Industrial & Flex	0%	0%	100%	100%	100%	0%
Total	100%	100%	100%	100%	100%	100%

Assumptions by FCS GROUP and City staff based on local observations.

Vacant Land Needs Forecast by Zoning Classification, Scenario A Forecast

Land Use Classification	Office	Government	Flex/Bus. Park	Gen. Industrial	Warehouse	Retail	Total
Commercial (retail, office, lodging)	5.5	-	-	-	-	15.0	20.5
Mixed Use	-	-	-	-	-	-	-
Public	-	1.7	-	-	-	-	1.7
General Industrial & Flex	-	-	42.8	127.5	72.3	-	242.7
Total	**5.5**	**1.7**	**42.8**	**127.5**	**72.3**	**15.0**	**264.9**

Vacant Land Needs Forecast by Zoning Classification, Scenario B Forecast

Land Use Classification	Office	Government	Flex/Bus. Park	Gen. Industrial	Warehouse	Retail	Total
Commercial (retail, office, lodging)	6.8	-	-	-	-	17.9	24.7
Mixed Use	-	-	-	-	-	-	-
Public	-	2.0	-	-	-	-	2.0
General Industrial & Flex	-	-	96.8	320.9	181.8	-	599.5
Total	**6.8**	**2.0**	**96.8**	**320.9**	**181.8**	**17.9**	**626.2**

Vacant Land Needs Forecast by Zoning Classification, Scenario C Forecast

Land Use Classification	Office	Government	Flex/Bus. Park	Gen. Industrial	Warehouse	Retail	Total
Commercial (retail, office, lodging)	10.2	-	-	-	-	23.6	33.9
Mixed Use	-	-	-	-	-	-	-
Public	-	2.0	-	-	-	-	2.0
General Industrial & Flex	-	-	106.2	338.0	191.5	-	635.8
Total	**10.2**	**2.0**	**106.2**	**338.0**	**191.5**	**23.6**	**671.6**

Canby UGB Land Needs for Employment (gross buildable acres)

General Land Use	Low	Medium	High
Commercial (CD, HC)	20	25	34
Industrial (CM, LI, HI)	243	599	636
Public & Education (excl. schools & parks)	2	2	2
Total Land Need (unconstrained acres)	**265**	**626**	**672**

Source: findings based on preceding assumptions.

Appendix E: Buildable Land Inventory Methodology

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

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

1. Calculate gross acres by plan designation, including classifications for fully vacant and partially-vacant parcels. This step entails "clipping" all of the tax lots that are bisected by the current UGB to eliminate land outside current UGB from consideration for development at this time. City staff input was provided to provide a level of quality assurance to review output is consistent with OAR 660-008-0005(2) and OAR 660-009-0015 (3).

2. Calculate gross buildable acres by plan designation by subtracting land that is constrained from future development, such as such as existing public right-of-way, parks and open space, steep slopes, and floodplains. Canby's Comprehensive Plan call for an additional reduction for wetlands from the buildable land.

3. Calculate net buildable acres by plan designation, by subtracting future public facilities such as roads, schools and parks from gross buildable acres.

4. Determine total net buildable acres by plan designation by taking into account potential redevelopment locations and mixed-use development opportunity areas.

The detailed steps used to create the land inventory are described below.

Economic Land Base for Employment Lands

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

Comprehensive Land Use Classifications

- Private Recreation (PR)
- Residential Commercial (RC)
- Light Industrial (LI)
- Heavy Industrial (HI)
- Commercial/Manufacturing (CM)
- Highway Commercial (HC)
- Downtown Commercial (DC)

Zoning Categories

- Residential Commercial (CR)
- Light Industrial M1I)
- Heavy Industrial (M2)

- Commercial/Manufacturing (CM)
- Highway Commercial (C2)
- Downtown Commercial (C1)

These classifications have been kept consistent throughout the analysis.

Canby Buildable Land Categories EOA

Vacant land: Properties with no structures or have buildings with very little value. For purpose of the BLI, employment lands with improvement value less than $5,000 are considered vacant and the improvement value is 5% or less than the land value. These lands were also subjected to review using satellite imagery via Google Earth; and if the land is in a committed use such as a parking lot, an assessment has been made to determine if it is to be classified as vacant, part vacant or developed.

Partially vacant land: Properties that are occupied by a use (e.g., a home or building structure with value over $5,000) but have enough land to be subdivided without the need for rezoning. This determination is made using tax assessor records and satellite imagery. For lots with structures that are in value 40% below their land value, it is assumed that half the lot is developed and the other half is vacant. Commercial inventory for partially-vacant land includes lots of at least one acre in size and one half-acre of unimproved land. The partially-vacant industrial land inventory includes lots that have at least five acres of unimproved land.

Redevelopment Potential: Occupied properties with a higher land value than the on-site structure. Properties must be at least 20,000sqft to be considered of interest for redevelopment. Commercial inventory for redevelopment land includes lots of at least one acre in size and one half-acre of unimproved land. The redevelopable industrial land inventory includes lots that have at least five acres of unimproved land

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

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

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

Development Constraints

The BLI methodology for identifying and removing development constraints is consistent with state guidance on buildable land inventories per OAR 660-008-0005(2) and OAR 660-009-0015 (3), as well as 660-038-0070 and 660-038-0130. By definition, the BLI is intended to include land that is "suitable, available, and necessary for residential and economic uses." "Buildable Land" includes residential and economic designated land within the UGB, including vacant, part vacant and land that is likely to be redeveloped; and suitable, available and necessary for residential and economic uses. Public-owned land is generally not considered to be available for new growth unless the underlying zoning permits it. It should be noted that "available" in this context does not mean that the land is

presently on the market. It is assumed in this analysis that such land is expected to come on the market within the 20-year timeframe of this study.

Land is considered to be "suitable for new development" unless it is:

- Is severely constrained by natural hazards as determined by the Statewide Planning Goal 7;
- Is subject to natural resource protection measures determined under Statewide Planning Goals 5, 6, 15, 16, 17 or 18;
- Has slopes over 25 percent;
- Is within the 100-year flood plain; or
- Cannot be provided or served with public facilities

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

- Open water of at least one-half acre in size.
- Land within the 100-year floodplains. This includes lands in flood-hazard areas as identified by the Flood Prone classification of Canby's Comprehensive Plan.
- Wetlands identified by the City and identified in the Comprehensive Plan as a barrier for future development.
- Land identified as parks, open space, outdoor recreation or conservation. This includes school land, parks, natural areas, cemeteries, homeowner association-owned land used for common space, trail parcels, golf courses, utility easements, etc.
- Land in public ownership with no development potential.
- Land with slopes greater than 25%.

Economic land is slightly differently treated by state guidelines.

The following constraints have been used for the economic lands inventory.

- Open water of at least one-half acre in size.
- Wetlands identified by the City and identified in the Comprehensive Plan as a barrier for future development.
- Land designated for parks, open space, outdoor recreation or conservation. This includes school land, parks, natural areas, cemeteries, homeowner association-owned land used for common space, trail parcels, golf courses, utility easements, etc.
- Land in public ownership with no development potential (such as the County's fairgrounds).
- Lands in flood-hazard areas as identified by the Flood Prone classification of Canby's Comprehensive Plan.
- Land within floodways is 100% constrained.
- Economic land within the 100-year floodplain is reduced by 50%.
- Industrial Land with slopes greater than 10% and all other commercial land with slopes greater than 25%.

Economic Opportunities Analysis

City Council Hearing



September 6, 2023

City of Canby

3J CONSULTING

FCS GROUP
Solutions-Oriented Consulting

DLCD

DLCD Economic Opportunities Analysis(EOA) Grant

- Department of Land Conservation and Development (DLCD) Grant for EOA
- The EOA must be adopted into Canby Comprehensive Plan

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Economic Opportunities Analysis Overview

- **Economic Opportunities Analysis**
- Identifying land base to accommodate forecasted jobs.
- Establish employment targets based on economic assessment to establish amount of commercial and industrial acreage needed for 20-year population growth.
- Identify the anticipated acreage for employment land that may be brought into the city's urban growth boundary.
- Use the economic analysis as part of the Economic chapter of the Canby Comprehensive Plan and Transportation System Plan updates.

Economic Opportunities Analysis Advisory Group

- Kelly Reid and Leigh McIlvaine, DLCD
- Cindy Moore, Clackamas County Economic Development Coordinator
- Amy Oakley, Clackamas Workforce Partnership
- Briana Correa, Todos Juntos, Inc.
- Susan Myers, Capital Reality
- Teresa Sasse, Puddin'River Chocolates
- Brian Hodson, Canby Mayor
- Jason Padden, Canby City Council
- Sarah Spoon, Former Canby City Council

Economic Opportunities Analysis

- Employment Forecast Growth Scenario
- Economic Development Objectives
- Community Development Vision Statement
- Comprehensive plan text amendment consistency with Canby code and State law

Employment Growth Scenarios

Low Growth Scenario (safe harbor)

- Overall job growth generally equates to projected **growth in housing**
- Assumes industrial job growth drops by 50%
- **Results in much slower job growth** than the past 10 years

Medium Growth Scenario (endorsed by Advisory Committee)

- Industrial job growth consistent with past 11-year avg. growth rate in Canby
- Retail and government sector growth consistent with *Oregon Emp. Dept*. forecast for tri-county region
- Service sector assumed to approach *Oregon Emp. Dept.* forecasts for the region
- **Most likely growth scenario** based on Canby history and emerging trends

High Growth Scenario

- Like Medium Scenario, but also **reflects aspirational objective aimed at optimizing family-wage jobs and service jobs with prime industrial sites and enhanced visitation & amenities**
- **Industrial sector assumed to add 300 more jobs** than Medium Scenario (with at least 1-3 additional large employers)
- **Service-sector** job growth rate equates to OED forecast for the Region (with **460 more jobs** than medium scenario).
- **Requires added attractions and amenities** (such as new hotel and a sportsplex)

Canby EOA Overall Land Needs

- Evaluation of Low, Medium & High Growth Scenario
- Adjustments for building vacancies, home-based work, and mixed use
  - Industrial shortfall = +/-438 acres in **medium scenario**
  - Commercial shortfall = +/-8 acres in **medium scenario**

Canby UGB Employment Land Needs (gross buildable unconstrained acres)

Comp. Plan Designation	Land Supply*	Land Need (Demand)**			Land Need (Shortfall)		
		Low	Medium	High	Low	Medium	High
Commercial (RC, DC, HC)	16.4	20.5	24.7	33.9	(4.1)	(8.3)	(17.5)
Industrial/Other Emp. (CM, LI, HI)*	163.0	244.4	601.5	637.8	(81.4)	(438.5)	(474.8)
Total Buildable Land (gross acres)	**179.4**	**264.9**	**626.2**	**671.6**	**(85.5)**	**(446.8)**	**(492.2)**

** Includes projects in the development pipeline that have no building permit issued as of Jan. 1, 2023.*

*** Excludes potential public land needs for new parks and schools.*

Community Input will inform Canby's Comprehensive Plan and Transportation System Plan update with new goals and policies regarding land use, transportation, infrastructure and community development.

Economic Development Objectives

DRAFT Economic Development Objectives

1. Enhance Canby's positive business environment with adequate commercial, industrial and mixed-use sites to address future growth opportunities.
2. Plan for Industrial expansion areas east and north of Mulino Rd.
3. Retain and attract businesses that provide quality jobs with high levels of employment per acre
4. Provide incentives for targeted job creation and major private investment
5. Support expansion in health services
6. Support workforce training and development

Which objectives would you like to change or add?

Economic Development Objectives

DRAFT Economic Development Objectives (continued)

7. Expand opportunities for the development of workforce housing
8. Expand lodging options
9. Fund roads and infrastructure using innovative techniques
10. Support arts & visitation, including agri- and bicycle-tourism
11. Attract downtown redevelopment with integrated mixed-use buildings
12. Update design standards and provide incentives for building renovations
13. Think Global/Regional & Act Local with respect to community development

Which objectives would you like to change or add?

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Planning Commission Recommendations From August 14, 2023 Hearing

1. Enhance Canby's positive business environment with adequate commercial, industrial and mixed-use sites to address future growth opportunities.

- ***Planning Commission recommended targeting high tech industries, light manufacturing, agricultural specialty industries, higher education—community college, and satellite location for continuing education.***

3. Retain and attract businesses that provide quality jobs with high levels of employment per *acre*

- ***The Planning Commission requested: that council direct them to review the required employees per acre and make a code recommendation on the required employees per acre and exception criteria for projects below the designated employee per acre.***

5. Support expansion in health services

- ***Planning Commission would like focus to include support services for the health industry, senior living, in addition to outpatient treatment facilities.***

Planning Commission Recommendations, Cont.

8. Expand lodging options

- ***Planning Commission recommended focus on hotel convention center/conference center to support activities at the Fairgrounds and other events in the city.***

9. Fund roads and infrastructure using innovative techniques

- ***Planning Commission recommended using urban renewal funds for major infrastructure and focusing on a radius road system around city to address future road needs as the city expands.***

10. Support arts & visitation, including agri- and bicycle-tourism

- ***Planning Commission would like to encourage promoting of a convention center.***

11. Attract downtown redevelopment with integrated mixed-use buildings

- ***Planning Commission would like to better connect the downtown and the industrial park.***

Community Development Vision Statement

- Canby shall retain and enhance its unique sense of community and livable neighborhoods. Canby continues to be a great location for businesses to thrive and expand. Canby's downtown is inviting and safe, with innovative businesses that meet the community's needs. Canby's employment centers attract a diverse mix of businesses that offer quality jobs and benefits. The Highway 99E Corridor is designed as a safe and attractive gateway that invites visitors to explore Canby. The City of Canby proactively plans for and invests wisely in infrastructure and services that enable the community to manage growth in a sustainable manner.

Canby Comprehensive Plan Text Amendment Criteria

A. Legislative Plan Amendment Standards and Criteria:

The planning commission and city council shall consider the following in judging whether to approve a legislative plan amendment/text amendment:

- The remainder of the Comprehensive Plan of the city, and the plans and policies of the county, state and local districts, in order to preserve functions and local aspects of land conservation and development;
- A public need for the change;

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Canby Comprehensive Plan Text Amendment Criteria Cont.

- Whether the proposed change will serve the public need better than any other change which might be expected to be made;
- Statewide planning goals

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Canby Comprehensive Plan Text Amendment Criteria Responses

The comprehensive plan text amendment is consistent with:

- Canby Comprehensive Plan and Transportation System Plan.
- Meets anticipated 20-year community employment needs.
- Vetted through an in-depth public process that included evaluating alternatives and has been vetted with DLCD.
- EOA Report provides a factual documentation of the 20-year employment needs.
- The EOA Advisory Group recommended approval of the EOA Report and medium growth scenario, also supported by the planning commission and city council at separate hearings on March 27, 2023 and April 19, 2023 where the EOA was accepted, and at the August 14, 2023 planning commission hearing.

Canby Comprehensive Plan Text Amendment Criteria Responses Cont.

- The comprehensive plan text amendment is consistent with the Canby Comprehensive Plan Policies.
- The comprehensive plan text amendment does not make changes to the Transportation System Plan, and does not affect park facilities, public service demand or impacts to natural resource areas.

Canby Comprehensive Plan Text Amendment Criteria Responses Cont.

- The comprehensive plan text amendment will provide a factual basis on which to rely when creating economic goals and policies in the updated comprehensive plan.
- The comprehensive plan text amendment is consistent with 19 statewide planning goals.
- The comprehensive plan text amendment is consistent with adopted city council goals.

Community Engagement

The comprehensive text amendment was vetted:

- In the three meetings of EOA advisory group
- October 19, 2022 planning commission/city council joint work session, November 2, 2022 city council work session, November 28, 2022 planning commission work session
- January 24, 2023 Open House
- March 1, 2023 planning commission/city council joint work session.
- Additionally, the Canby Hearld ran an article on the EOA on January 27, 2023.
- Stakeholder Interviews occurred from April to October 2022, including local business owners, employers, developers, real estate agents.

Community Engagement Cont.

- An electronic community survey also was included during the summer/fall 2022 with 70 respondents.
- A second community electronic survey followed the January 24, 2023 open house with 63 respondents.
- The first community survey ranked the top advantages to doing business in Canby, the survey ranked the types of businesses or jobs needed in Canby.

Community Engagement Cont.

- The second community survey largely recognized the importance of employment to the Canby community and support for addressing these needs through the 13 economic development objectives.
- No public comments were received prior to or during the August 14, 2023 planning commission hearing.

Hearing Discussion

- Questions
- Hearing Discussion
- Request motion to approval EOA by city council and adoption of ordinance

Thank You

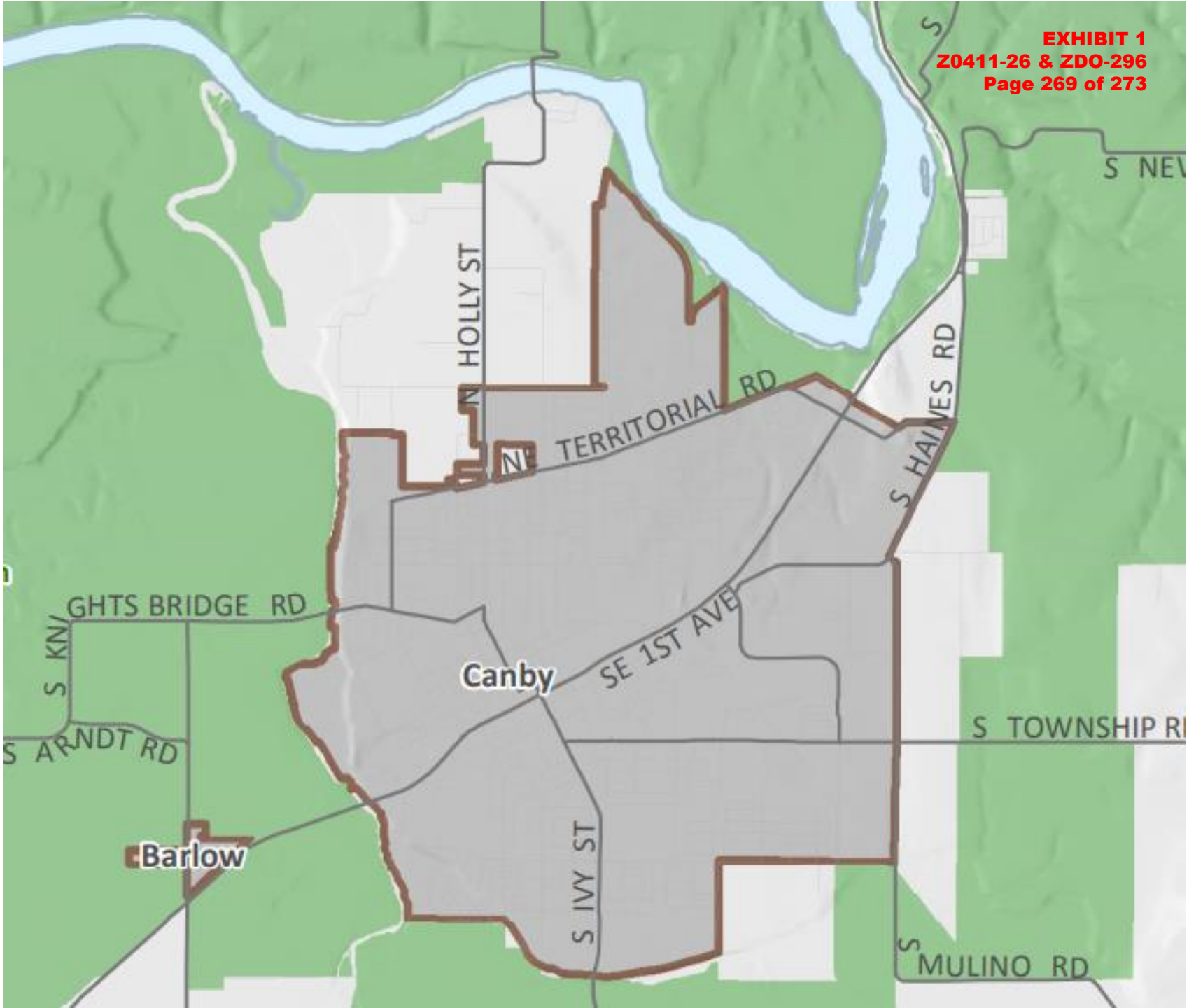


September 6, 2023

City of Canby

Canby Reserves

- City of Canby
- Rural Reserve
- Undesignated



Planning and Zoning
Department of Transportation and Development
Development Services Building
150 Beavercreek Road | Oregon City, OR 97045
503-742-4500 | zoninginfo@clackamas.us
www.clackamas.us/planning

PRE-APPLICATION CONFERENCE SUMMARY

Permit Type: Comprehensive Plan Map Amendment

File No.: ZPAC0099-25

Proposal: City of Canby Urban Growth Boundary (UGB) expansion

Staff Contact: Martha Fritzie, Principal Planner, mfritzie@clackamas.us, 503-742-4529
Karen Buehrig, Long Range Planning Manager, karenb@clackamas.us, 503-742-4683

Applicant: Don Hardy, City of Canby

Assessor's Map and Tax Lot No.: Multiple

Total Land Area (Acres): Approx. 512.3 acres

Pre-Application Conference Date: 9/10/2026 via Zoom.

Date of this Summary: 9/10/2026

I. APPLICABLE STATE AND COUNTY STANDARDS

Note that this application would be submitted for county consideration per OAR 660-018-0021, which requires the establishment of a UGB to be agreed upon and mutually adopted by a city and county prior to submittal to the state for acknowledgement.

A. Statewide Planning Goals

A Comprehensive Plan map amendment must be consistent with all applicable Statewide Planning (SWP) Goals and implementing Oregon Revised Statutes (ORSs) and Oregon Administrative Rules (OARs). Please review and address any applicable SWP Goals in the application narrative. At a minimum these should include:

Goal 1, *Citizen Involvement*

Goal 9, *Economic Development*

Goal 10, *Housing*

Goal 11, *Public Facilities and Services*

B. Comprehensive Plan (Comp Plan)

A Comprehensive Plan map amendment must be consistent with all applicable Comprehensive Plan goals and policies. Please review and address any applicable goals and policies in the application narrative. At a minimum these should include:

Chapter 4, *Land Use*

Planning and Zoning
Department of Transportation and Development
Development Services Building
150 Beavercreek Road | Oregon City, OR 97045
503-742-4500 | zoninginfo@clackamas.us
www.clackamas.us/planning

4.A General Urbanization policies

4.F Rural Reserve area policies

Goal 11, *The Planning Process*

II. LAND USE PERMITTING PROCESS

Comprehensive Plan Map Amendment: As provided for in Section 1307 of the ZDO, a Comprehensive Plan amendment will include notice to the Community Planning Organization (CPO), any applicable service providers (sewer, water, fire, etc.) and affected government agencies; and are reviewed at public hearings before the County Planning Commission and Board of County Commissioners (Board). If the application is approved, the applicant must comply with any conditions of approval identified in the decision. The County's decision can be appealed to the Oregon Land Use Board of Appeals (LUBA).

- You will submit a General land Use Application for the Comprehensive Plan amendment. **Please note that as of Sept. 1, 2026, all land use applications and other forms will need to be submitted online using the Development Direct portal.** For more information, visit the Planning and Zoning webpage. Please note that the instructions on that page indicate you need to download a land use application - for this particular request, you will need the "General Land Use Application" form.
- Fee: **$13,131** (Comp Plan Map Amendment)
  - Payable by cash, credit card, or check payable to Clackamas County
    - Credit card payment is subject to a 2.75% service fee and must be accompanied by the Credit Card Authorization Form
- Timeline:
  - Completeness review: 30 days; within the first 30 days of the application being submitted the Planning Division will review the application materials to ensure that everything required has been turned in. In the event that there are items missing from the application packet, you will be notified of the specific items missing and information on how you can provide staff with the missing documents/information.
  - Notice period: at least 35 days prior to the first evidentiary hearing the County will send a mailed notice to applicable Community Planning Organizations and agencies
  - Staff report: Planning Division staff will write a staff report and make a recommendation to the Planning Commission who will issue a recommendation to the Board. These reports are available to the public for review at least one week prior to each hearing.
  - Public hearings: a minimum of two public hearings will be held – one each with the Planning Commission and the Board for the purpose of receiving testimony regarding the application.
  - Decision: The decision authority is the Board of County Commissioners. The Board will make an oral decision based on the applicable standards and criteria at a public hearing and then will formally adopt the decision at a later date.

Please note that city staff/consultant team will be the applicant in this case. County staff will review the city's submittal and issue a staff report and recommendation to the county Planning Commission and Board of County Commissioners. County staff will present the proposal and

Planning and Zoning
Department of Transportation and Development
Development Services Building
150 Beavercreek Road | Oregon City, OR 97045
503-742-4500 | zoninginfo@clackamas.us
www.clackamas.us/planning

recommendation at each hearing and city staff/consultants will have an opportunity to present during the testimony potion of the hearing.

III. QUESTIONS RAISED BY THE APPLICANT & COUNTY STAFF RESPONSES

1. Please provide us with the list of required submittal items for the Canby UGB Amendment Expansion.

   Please include (at a minimum) the following items:
   - *Land use application form*
   - *Narrative including*
     - *Summary of request from county*
     - *Summary of relevant background information*
     - *Summary of public outreach conducted during the city process*
     - *Findings addressing relevant Statewide Planning Goals and county Comprehensive Plan goals and policies*
     - *Any other information you think is relevant for the decision-makers*
   - *Map that clearly shows area proposed for expansion*
   - *Other relevant background information (the two documents provided with preapplication request are likely sufficient)*

2. Please confirm the review fee for the UGB Amendment.
   See above (Section II).

IV. MINIMUM LAND USE APPLICATION SUBMITTAL REQUIREMENTS

The submittal requirements are provided in ZDO 1307.07(C). In addition, review the applicable criteria listed above while preparing your written narrative and other land use application items. It is the applicant's responsibility to clearly demonstrate how a proposal meets all applicable criteria.

V. AGENCY/DEPARTMENT CONTACT INFORMATION:

This list is provided for the applicant to follow up with relevant service providers, agencies, Community Planning Organization and County staff as needed.

Contact	Invited to Pre-App	Attended Pre-App
Martha Fritzie, Principal Planner, MFritzie@clackamas.us, 503-742-4529	Yes	Yes
Karen Buehrig, Long Range Planning Manager, karenb@clackamas.us, 503-742-4683	Yes	Yes
CPOs: Aurora-Butteville-Barlow CPO, Canby CPO, and South Canby CPO (all inactive)	No	No

**Community Planning Organizations (CPOs) are part of the county's community involvement program. They are advisory to the Board of County Commissioners, Planning Commission and Planning and Zoning Division on land*

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use matters affecting their communities. CPOs are notified of proposed land use actions and decisions on land within their boundaries and may review these applications, provide recommendations or file appeals. You are encouraged to contact the CPO and attend any meeting they may hold to discuss your application.

VI. LIST OF ATTACHMENTS

None

VII. LIMITATIONS AND DISCLAIMERS

Pre-application conferences are advisory and are intended to familiarize applicants with the requirements of the ZDO, provide applicants with an opportunity to meet with staff and discuss proposed projects in detail, and identify standards, criteria, and procedures prior to filing a land use permit application. The pre-application conference is a tool to orient applicants and to assist them in navigating the land use review process. It is not an exhaustive review that identifies or resolves all potential issues and does not bind or preclude the County from enforcing all applicable regulations or from applying regulations in a manner differently than may have been indicated at the time of the pre-application conference.

The information in this document is introductory and is designed to act as a guide to relevant Zoning and Development Ordinance (ZDO) and Comprehensive Plan standards. This is an initial review and is based on the information submitted by the applicant for the pre-application conference.

Any opinion or advice provided herein is informational only and is based on any information specifically provided or reasonably available, as well as any applicable regulations in effect on the date the research was conducted. Any opinion or advice provided herein may be revised, particularly where new or contrary information becomes available, or in response to changes to state law or administrative rule, future legislative amendments of the Zoning and Development Ordinance, decisions of courts or administrative tribunals, or quasi-judicial land use decisions.

This is not a land use decision as defined by Oregon Revised Statutes 197.015(10).

Clackamas County is committed to providing meaningful access and will make reasonable accommodations, modifications, or provide translation, interpretation or other services upon request. Please contact us at 503-742-4545 or drenhard@clackamas.us.

503-742-4545: ¿Traducción e interpretación? | Требуется ли вам устный или письменный перевод?
翻译或口译？| Cần Biên dịch hoặc Phiên dịch? | 번역 또는 통역?

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

October 23, 2026

Martha Fritzie, Principal Planner
Clackamas County

Re: City of Canby UGB amendment and wetlands

Dear Martha,

Please add this letter to the record for the City of Canby UGB amendment. Attached to this letter is a wetland determination from the Oregon Department of State Lands (DSL). The purpose of adding this information to the record is explained below. The determination does not impact any approval criteria for the UGB amendment itself, and DLCD does not expect this information to impact the county's review of the UGB proposal. The City of Canby has already received a copy of the wetland determination and has been apprised of the requirements explained in this letter.

When wetlands are known to exist in a UGB expansion area, Oregon Administrative Rules 660-023-0100 and 660-023-0250 require completion of a local wetlands inventory (LWI) in the expansion area before urban development occurs. This requirement will not impact Clackamas County; it is a future requirement that will apply to the City of Canby.

Statewide Land Use Planning Goal 5 is intended to protect natural resources, scenic and historic areas, and open spaces. A city's comprehensive plan must be compliant with rules in OAR 660-023 that implement Goal 5. Specifically, division 23 requires that cities must apply the resource-specific rules to Goal 5 resources, including wetlands, when a city "amends an acknowledged UGB and factual information is submitted demonstrating that a resource site, or the impact areas of such a site, is included in the amended UGB area" (OAR 660-023-0250(3)(c). When DLCD receives a notice for a proposed UGB amendment, we send a request to DSL for a wetland determination in the proposed UGB expansion area. The reason we do this is to ensure that any evidence of wetlands in the proposed area can be added to the record for the UGB amendment

LWIs provide much better information on the location and extent of wetlands than other data sources, such as the National Wetlands Inventory or the Statewide Wetland Inventory. LWIs also describe the functions each wetland provides. LWIs and local Goal 5 wetland protection measures preserve important wetland functions in place, which in turn improve flood mitigation, surface water quality protection, ground water recharge, and important cultural resources.

Attached is the wetland determination from DSL for the proposed UGB expansion area in Canby. DLCD looks forward to working with the City of Canby and DSL on the Local Wetland Inventory if the UGB amendment is approved.

Sincerely,

Kelly Reid

Kelly Reid, AICP
Regional Representative, DLCD

CC: Don Hardy, City of Canby Community Development Director
Amanda Punton, DLCD Goal 5 specialist
Leila Aman, DLCD Community Services Division Manager

Wetland Determination Response

Response Page

Department of State Lands (DSL) WD# *
WD2026-0440

There was an Onsite Visit *
○ Yes ◉ No

Activity Location

Township	Range	Section
03S	01E	28

QQ section
A

Tax Lot(s)
300,301,302,400,500p,501,1500,1600

Street Address
Near 625 NE 22nd Ave
Address Line 2

City
Canby

State / Province / Region
OR

Postal / Zip Code
97013

Country
Clackamas

Latitude
45.282030

Longitude (?)
-122.689127

Township	Range	Section
03S	01E	26

QQ section

Tax Lot(s)
MANY

Street Address
NW of S Haines Rd & SE Territorial Rd
Address Line 2

City
Canby

State / Province / Region
OR

Postal / Zip Code
97013

Country
Clackamas

Latitude
45.282071

Longitude (?)
-122.658468

Township	Range	Section
03S	01E	27

QQ section
DA

Tax Lot(s)
200,201,280,300,900p

Street Address

W of S Hwy 99E & SE Territorial Rd

Address Line 2

City

Canby

State / Province / Region

OR

Postal / Zip Code

97013

Country

Clackamas

Latitude

45.279339

Longitude (?)

-122.661828

Township	Range	Section
03S	01E	28

QQ section

B

Tax Lot(s)

MANY

Street Address

N of NW 22nd Ave

Address Line 2

City

Canby

State / Province / Region

OR

Postal / Zip Code

97013

Country

Clackamas

Latitude

45.282389

Longitude (?)

-122.697810

Township	Range	Section
03S	01E	28

QQ section

C

Tax Lot(s)

1000,1100,1101,1200,1300,1301,1400

Street Address

SE of NW 22nd Ave & N Birch St

Address Line 2

City

Canby

State / Province / Region

OR

Postal / Zip Code

97013

Country

Clackamas

Latitude

45.280480

Longitude (?)

-122.702238

Township	Range	Section
03S	01E	29

QQ section

A

Tax Lot(s)

MANY

Street Address
NW & NE of NW 22nd Ave & N Baker Dr
Address Line 2

City
Canby
State / Province / Region
OR
Postal / Zip Code
97013
Country
Clackamas

Latitude
45.282181
Longitude (?)
-122.708524

Township
03S
Range
01E
Section
34

QQ section
A
Tax Lot(s)
200,2200

Street Address
23240 S Mulino Rd
Address Line 2

City
Canby
State / Province / Region
OR
Postal / Zip Code
97013
Country
Clackamas

Latitude
45.270776
Longitude (?)
-122.661367

Township
03S
Range
01E
Section
35

QQ section
Tax Lot(s)
MANY

Street Address
E of Canby-Mulino Rd
Address Line 2

City
Canby
State / Province / Region
OR
Postal / Zip Code
97013
Country
Clackamas

Latitude
45.265813
Longitude (?)
-122.654392

Township
04S
Range
01E
Section
02

QQ section
Tax Lot(s)
600,601

Street Address

SE of S Mulino Rd & S Township Rd

Address Line 2

City

Canby

State / Province / Region

OR

Postal / Zip Code

97013

Country

Clackamas

Latitude

45.254894

Longitude (?)

-122.658597

Wetland/Waterway/Other Water Features

- [x] There are/may be wetlands, waterways or other water features on the property that are subject to the State Removal-Fill Law based upon a review of wetland maps, the county soil survey and other available information.
- [x] The National Wetlands Inventory shows wetland, waterway or other water features on the property
- [x] The National Hydrography Dataset shows wetland, waterway or other water features on the property
- [x] The county soil survey shows hydric (wet) soils on the property. Hydric soils indicate that there may be wetlands.
- [x] The property includes or is adjacent to designated Essential Salmonid Habitat.

Your Activity

- [ ] It appears that the proposed project is within a designated State Scenic Waterway and **may** require a State permit.
- [x] It appears that the proposed project **may** impact wetlands and/or waters and **may** require a State permit.
- [x] An onsite inspection by a qualified wetland consultant is recommended prior to site development to determine if the site has wetlands or other waters that may be regulated. The determination or delineation report should be submitted to DSL for review and approval. Approved maps will have a DSL stamp with approval date and expiration date.

Applicable Oregon Removal-Fill Permit Requirement(s)

☑ A state permit is required for 50 cubic yards or more of fill removal or other ground alteration in wetlands, below ordinary high water of waterways, within other waters of the state, or below highest measured tide.

☑ A state permit is required for any amount of fill, removal, and/or other ground alteration in Essential Salmonid Habitat and within adjacent off-channel rearing or high-flow refugia habitat with a permanent or seasonal surface water connection to the stream.

DSL Review Comments

Wetland Ecologist Comments *

Expert Opinion indicates that wetlands and other waters exist within the proposed Canby UGB expansion area.

This is based on DSL review of: Predominantly hydric soils, NHD, NWI, ESH, aerial imagery, LiDAR, and DSL File numbers WD1999-0554, WD2017-0095, APP60002, & RGL5939. Based on the available information, a Goal 5 wetlands evaluation (660-023-100, 141-086-0100 et seq.) is recommended for the proposed UGB expansion area. Please enter this document into the local record for # UGB 26-01 and DLCD PAPA # 003-26 for the proposed 2026 Canby UGB expansion.

DSL recommends that the city's planning staff make a records request for DSL agency decision records within the proposed UGB expansion area for the city's records.

☑ This is a preliminary jurisdictional determination and is advisory only.

This report is for the State Removal-Fill law only. City or County permits may be required for the proposed activity.

☑ A Federal permit may be required by The Army Corps of Engineers: 541-600-7644

Contact Information

- For information on permitting, use of a state-owned water, wetland determination or delineation report requirements please contact the respective DSL Aquatic Resource, Proprietary or Jurisdiction Coordinator for the site county. The current list is found at: https://www.oregon.gov/dsl/waterways/pages/staff-directory.aspx
- The current Removal-Fill permit and/or Wetland Delineation report fee schedule is found at: https://www.oregon.gov/dsl/wetlands-waters/Documents/RemovalFillFees.pdf

Response Date

10/7/2026

Response by:

Jessica Salgado

Response Phone:

541-408-1892

For Official Use Only

For Official Use Only

This section will be hidden on the form sent out with the response.

Agency Decision Maps *

WD20260440 LocationMap 1.pdf	1.86MB
WD20260440 LocationMap 2.pdf	1.51MB
WD20260440 LocationMap 3.pdf	1.89MB
WD20260440 Taxlot Table_JS.pdf	46.36KB

Review Info Maps

Note: These maps are not sent to the customer.

WD20260440 NwiAerial 1.pdf	1.86MB
WD20260440 NwiAerial 2.pdf	1.61MB
WD20260440 NwiAerial 3.pdf	1.92MB
WD20260440 NhdEshSoilsLidar 1.pdf	1.8MB
WD20260440 NhdEshSoilsLidar 2.pdf	1.51MB
WD20260440 NhdEshSoilsLidar 3.pdf	1.87MB
WD20260440 ExpertOpinion 1.pdf	1.47MB
WD20260440 ExpertOpinion 2.pdf	1.73MB
WD20260440 ExpertOpinion 3.pdf	1.74MB

Request Received
9/8/2026

Has Wetlands *
Yes

ESH *
Yes

Wild and Scenic *
No

State Scenic *
No

Entire Site Checked *
No

Waters Present *
Y

Onsite (By wetland consultant) *
N

State-owned Water
No

Coast Zone *
No

County *
Clackamas

Adjacent Waterbody
Molalla River, tributaries, hydric soils

Document Type *
(•) Agency PJD Response ( ) Agency JD Response

Additional email recipients

Email
kelly.reid@dlcd.oregon.gov

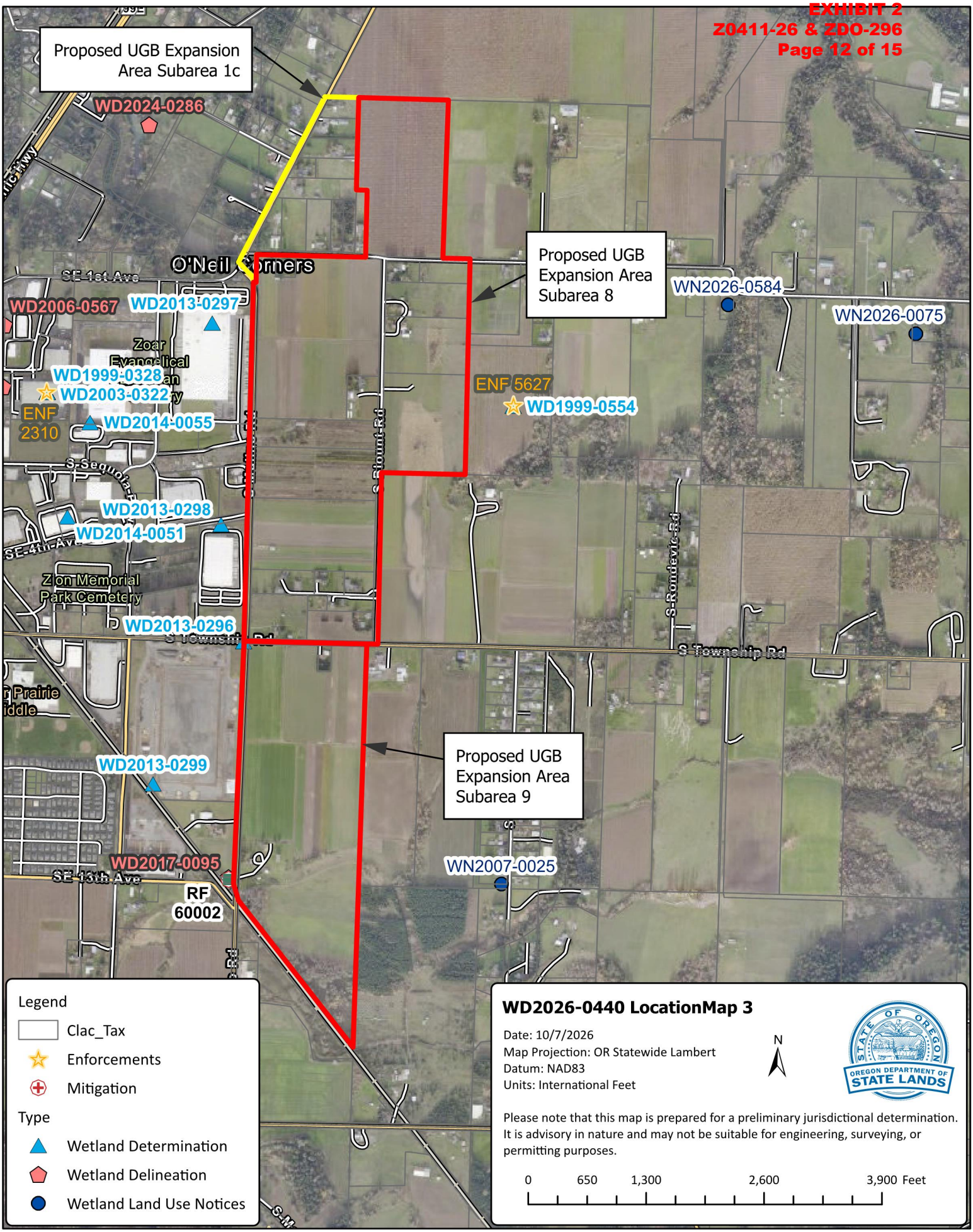
Email
amanda.punton@dlcd.oregon.gov

Taxlot Info

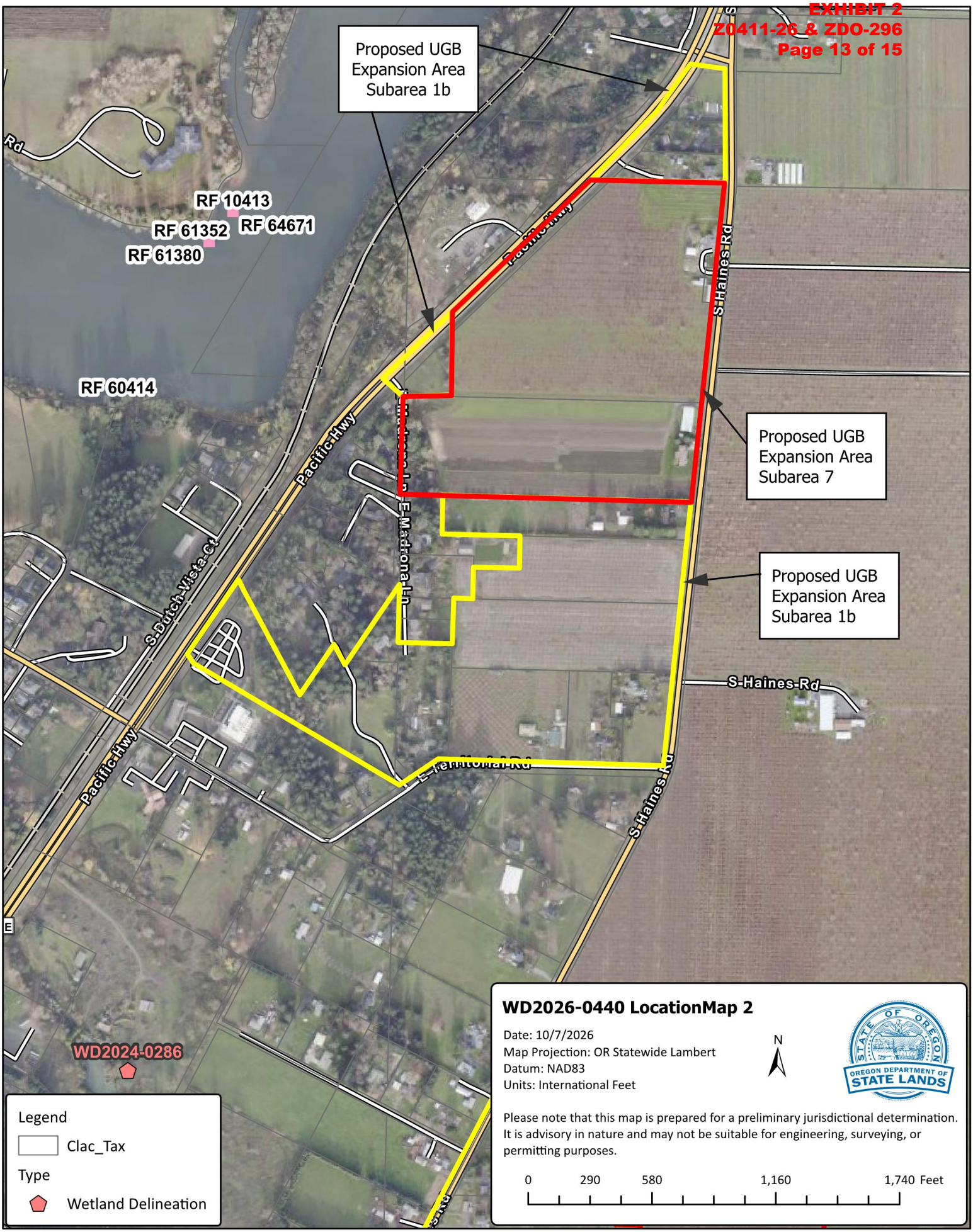
TLID	SITEADDR	Subarea
31E26 00300	22053 S HAINES RD	1b
31E26 00400	22075 S HAINES RD	1b
31E26 00500	22111 S HAINES RD	1b
31E26 00900	NO SITUS	1b
31E26 01000	NO SITUS	1b
31E26 01100	22200 S HAINES RD	7
31E26 01200	NO SITUS	7
31E26 01300	22345 S HAINES RD	7
31E26 01400	22353 S HAINES RD	1b
31E26 01500	NO SITUS	1b
31E26 01600	2912 SE TERRITORIAL RD	1b
31E26 01602	NO SITUS	1b
31E26 01604	2988 SE TERRITORIAL RD	1b
31E26 01605	22587 S HAINES RD	1b
31E26 01700	2742 SE TERRITORIAL RD	1b
31E27DA00200	2690 SE TERRITORIAL RD	1b
31E27DA00201	2375 E MADRONA LN	1b
31E27DA00280	NO SITUS	1b
31E27DA00300	NO SITUS	1b
31E27DA00900	2350 SE TERRITORIAL RD	1b
31E28A 00300	625 NE 22ND AVE	1a
31E28A 00301	575 NE 22ND AVE	1a
31E28A 00302	NO SITUS	1a
31E28A 00400	2327 N MAPLE ST	1a
31E28A 00500	2389 N MAPLE ST	1a
31E28A 00501	609 NE 22ND AVE	1a
31E28A 01500	2366 N LOCUST ST	1a
31E28A 01600	2236 N LOCUST ST	1a
31E28B 00700	162 NE 22ND AVE	1a
31E28B 00701	168 NE 22ND AVE	1a
31E28B 00702	2393 N LOCUST ST	1a
31E28B 00703	2277 N LOCUST ST	1a
31E28B 00704	2305 N LOCUST ST	1a
31E28B 00800	138 NE 22ND AVE	1a
31E28B 00801	138 NE 22ND AVE	1a
31E28B 00900	NO SITUS	1a
31E28B 00901	120 NE 22ND AVE	1a
31E28B 01000	2234 N HOLLY ST	1a
31E28B 01100	NO SITUS	1a
31E28B 02200	NO SITUS	1a
31E28B 02201	456 NW 22ND AVE	1a
31E28B 02202	480 NW 22ND AVE	1a
31E28B 02300	466 NW 22ND AVE	1a

31E28B 02400	494 NW 22ND AVE	1a
31E28B 02500	NO SITUS	1a
31E28B 02600	614 NW 22ND AVE	1a
31E28B 02700	716 NW 22ND AVE	1a
31E28C 01000	387 NW 22ND AVE	1a
31E28C 01100	495 NW 22ND AVE	1a
31E28C 01101	NO SITUS	1a
31E28C 01200	627 NW 22ND AVE	1a
31E28C 01300	769 NW 22ND AVE	1a
31E28C 01301	NO SITUS	1a
31E28C 01400	1914 N BIRCH ST	1a
31E29A 00200	2375 N BAKER DR	1a
31E29A 00300	2323 N BAKER DR	1a
31E29A 00400	2290 N BAKER DR	1a
31E29A 00401	2225 N BAKER DR	1a
31E29A 00403	970 NW 22ND AVE	1a
31E29A 00404	2214 N BAKER DR	1a
31E29A 00405	1000 NW 22ND AVE	1a
31E29A 00406	980 NW 22ND AVE	1a
31E29A 00407	2330 N BAKER DR	1a
31E29A 00408	NO SITUS	1a
31E29A 00409	NO SITUS	1a
31E29A 00500	2221 N BAKER DR	1a
31E29A 00600	934 NW 22ND AVE	1a
31E29A 00700	874 NW 22ND AVE	1a
31E29A 00800	NO SITUS	1a
31E34A 02000	23240 S MULINO RD	1c
31E34A 02200	NO SITUS	1c
31E35 00201	22840 S HAINES RD	1c
31E35 00202	22900 S HAINES RD	1c
31E35 00203	22962 S HAINES RD	1c
31E35 00204	NO SITUS	1c
31E35 00205	23040 S HAINES RD	1c
31E35 00206	NO SITUS	1c
31E35 00207	10115 S BREMER RD	1c
31E35 00208	10161 S BREMER RD	1c
31E35 00209	NO SITUS	8
31E35 00210	10201 S BREMER RD	1c
31E35 00212	22992 S HAINES RD	1c
31E35 00213	10211 S BREMER RD	1c
31E35 00300	23116 S HAINES RD	1c
31E35 00390	NO SITUS	1c
31E35 00400	10076 S BREMER RD	8
31E35 00500	10050 S BREMER RD	8
31E35 00600	23453 S BLOUNT RD	8
31E35 00700	NO SITUS	8
31E35 00701	23524 S MULINO RD	8

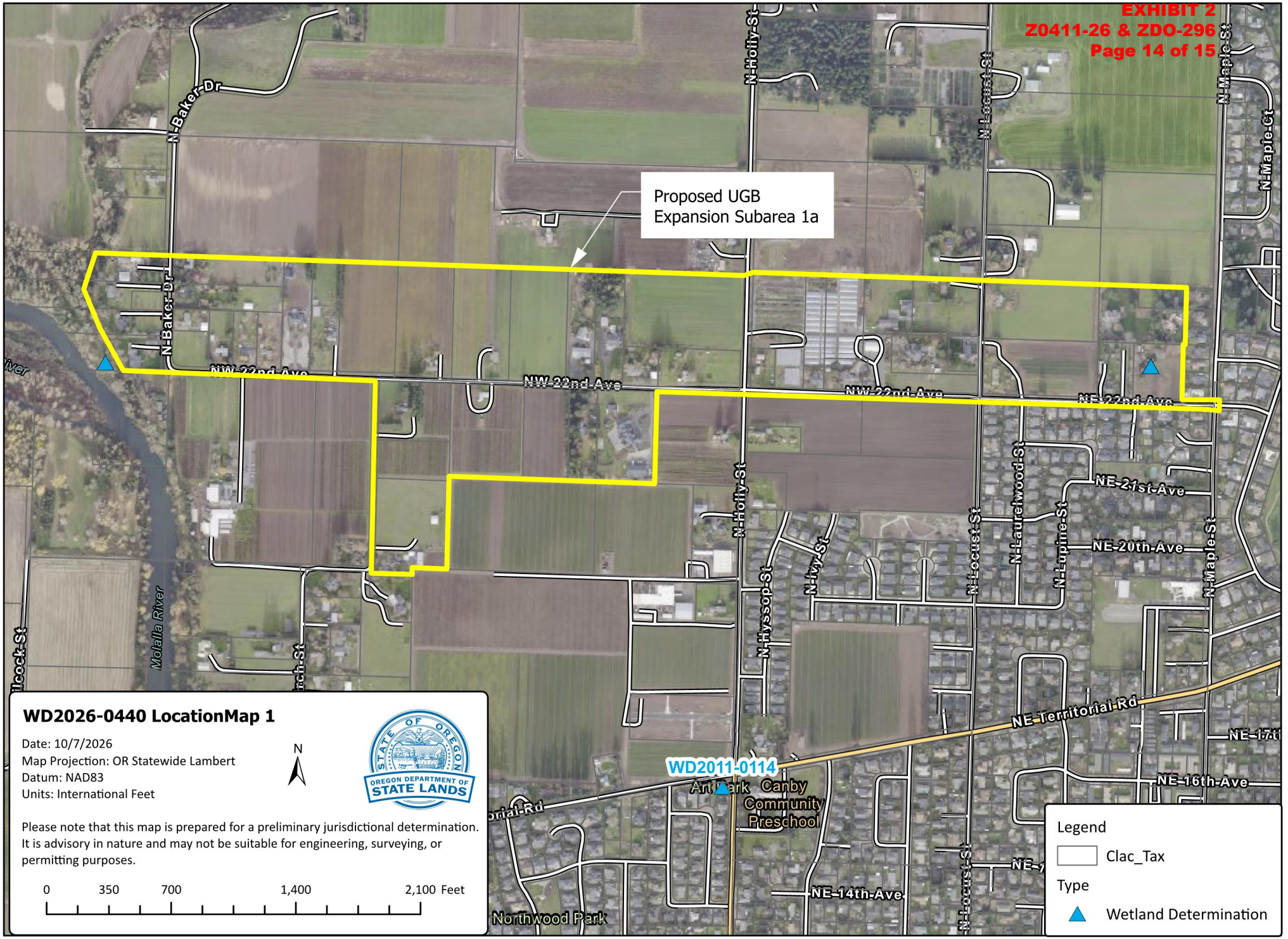
31E35 00800	23840 S MULINO RD	8
31E35 00801	23885 S BLOUNT RD	8
31E35 00802	23869 S BLOUNT RD	8
31E35 00803	23855 S BLOUNT RD	8
31E35 00900	10049 S TOWNSHIP RD	8
31E35 01000	23951 S BLOUNT RD	8
31E35 01001	23905 S BLOUNT RD	8
31E35 01002	NO SITUS	8
31E35 01200	NO SITUS	8
31E35 01202	23338 S BLOUNT RD	8
31E35 01300	23300 S BLOUNT RD	8
31E35 01301	10420 S BREMER RD	8
31E35 01400	23240 S BLOUNT RD	8
41E02 00600	24464 S MULINO RD	9
41E02 00601	10182 S TOWNSHIP RD	9



Sources: Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, © OpenStreetMap contributors, and the GIS User Community, Marion County assessor, Clackamas County assessor



Sources: Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, © OpenStreetMap contributors, and the GIS User Community, Marion County assessor, Clackamas County assessor



WD2026-0440 LocationMap 1

Date: 10/7/2026
Map Projection: OR Statewide Lambert
Datum: NAD83
Units: International Feet

N

Please note that this map is prepared for a preliminary jurisdictional determination. It is advisory in nature and may not be suitable for engineering, surveying, or permitting purposes.

0 350 700 1,400 2,100 Feet

Legend
Clac_Tax
Type
Wetland Determination

Sources: Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, © OpenStreetMap contributors, and the GIS User Community, Marion County assessor, Clackamas County assessor

Fritzie, Martha

From: REID Kelly * DLCD <Kelly.REID@dlcd.oregon.gov>
Sent: Friday, October 23, 2026 2:57 PM
To: Fritzie, Martha
Cc: Don Hardy; PUNTON Amanda * DLCD
Subject: letter for the record - Canby UGB
Attachments: 20261023_commentlettertoClackamasCo_signedwattachment.pdf

Warning: External email. Be cautious opening attachments and links.

Hi Martha,

I've attached a letter for the Canby UGB record. It is the one I have mentioned to you before about the DSL wetland determination and future LWI requirements. If you have any questions please let me know.

Thanks,

Kelly Reid , AICP
Portland Metro Area Regional Representative
Pronouns: She/Her
Oregon Department of Land Conservation and Development
Cell: 971-345-1987
kelly.reid@dlcd.oregon.gov | www.oregon.gov/LCD

Regional Representative for Clackamas County and Multnomah County communities