



December 6, 2025

BY EMAIL (housing.dlcd@dlcd.oregon.gov)

DLCD, Housing Division

635 Capitol Street NE, Suite 150
Salem, OR 97301

Re: City of Canby Housing Production Strategy (HPS)

Dear Housing Division Staff,

Both Housing Land Advocates (HLA) and the Fair Housing Council of Oregon (FHCO) are non-profit organizations that advocate for land use policies and practices that ensure an adequate and appropriate supply of affordable housing for all Oregonians. FHCO's interests relate to a jurisdiction's obligation to affirmatively further fair housing. HLA and FHCO support the Oregon Legislature's stated goal of encouraging the "production of housing to meet the need of Oregonians at all levels of affordability."

Thank you for the opportunity to comment on the City of Canby's Housing Production Strategy (HPS). Canby's strategies targeting the development of regulated affordable housing are commendable. These include Strategy N "System Development Charge (SDC) Waiver for Affordable Housing" and Strategy O "Construction Excise Tax (CET) Waiver." These are meaningful public interventions to encourage needed development underrepresented in the housing market in Canby.

Canby faces a crisis of affordable housing. HPS, p.13, Exhibit 2: Severe Rent Burden, p.13 shows that residents of the city suffer disproportionately from severe rent burden compared with state and county averages. In acknowledgement of this crisis, the HPS envisions "how the city can impact housing affordability, access and choice issues, displacement and housing stability." HPS, pp. 7 (Exhibit 2: Severe Rent Burden) and 13. The aforementioned Strategies N and O are representative of the kinds of power the city can exercise in pursuit of these laudable goals.

We are, however, skeptical that Canby's HPS in its current form will achieve the goals of housing affordability it sets for itself. This letter addresses five issues undermining the strength of the HPS, which are as follows:

1. Commitment to Fair and Equitable Housing
2. Demographic inconsistencies

3. A lack of mitigation strategies for displacement.
4. Timeline of HPS strategies
5. The HPS conflates state requirements with housing production strategies.

Recommendations:

1. Commitment to Fair and Equitable Housing

In HPS, Section V, entitled Achieving Fair & Equitable Housing Outcomes, the City making two troubling generalizations, claiming "an increase in supply will indirectly provide increased access to affordable housing for all residents of Canby" as well that "it is ... expected that the increase in supply will occur throughout the city, providing access to neighborhoods with high-quality community amenities..." HPS, p. 55. This assumption that a general increase of housing supply will equitably distribute itself among the City's population defies state statutory requirements to affirmatively further fair housing, and contradicts the intentions of the HPS as a host of strategies built upon "an analysis of who is at risk of being left behind in the existing housing environment." HPS, p. 7.

In Canby, demographic analysis of historically marginalized and vulnerable populations is imperative. The HPS's Exhibit 3: entitled Map of Canby Rent Burdened Households, 2020 is an interesting, albeit limited spatial analysis of renters and cost burden in the city. HPS, p. 14. Because the HPS is built around tangible housing production targets, we urge the City to quantify the number of rent burdened households in this map, rather than illustrate them as a percentage of the population. We encourage Canby to expand upon this analysis and follow the example set by the City of The Dalles, which provided maps in its HPS illustrating income, housing status, non-white population, and target zones for housing production. Attachment 1. This last analysis would supplement the language in the HPS referencing specific zones targeted by the HPS like the R-2 High-Density Residential Zone. In tandem with a need to address the risk of displacement as a result of proposed strategies (See Recommendation 3), we urge the City to address its role in affecting housing choice explicitly in pursuit of fair and equitable housing.

2. Demographic inconsistencies

While the HPS claims to establish its strategies upon "an analysis of who is at risk of being left behind in the existing housing environment," low-income residents, residents with disabilities, and the City's BIPOC community fail to be adequately represented in the HPS and its strategies. HPS, p. 7. This recommendation should be considered in tandem with Recommendation 1 as a meaningful step to address how the City affirmatively furthers fair housing.

In the HPS's appendices, the city identifies residents with disabilities as a vulnerable population. Residents with disabilities have disproportionately low median earnings and are more likely to be out of the labor force. HPS, p. 67. Regardless of these indications of housing insecurity, no strategy in the HPS concretely attributes benefits to residents with disabilities. Rather, stated benefits come with contingent language, like in Strategy A, which "could provide increased housing choice and accessibility... if this policy includes accessibility considerations",

or Strategy B, which "could cater to residents with disabilities by focusing on accessibility." HPS, pp. 25 and 28. In Strategy G, this conditional language wavers between benefit and burden for residents with disabilities, noting that while "Adoption of lower minimum lot size requirements would likely provide increased housing choice and improved access to services and amenities for Canby's disabled residents... townhomes developed as a result of reduced minimum lot size requirements are more likely to be multi-story and are unlikely to be developed with an elevator or other accessibility features." HPS, p. 38. As with Recommendation 1, we urge the City to affirmatively further accessible housing by committing to accessible design with concrete language that realizes the benefits of these strategies for its residents with disabilities.

This inconsistency between analysis of and regard for historically marginalized and vulnerable communities extends to the City's BIPOC population. BIPOC residents are generalized by a single, oft-repeated statistic, "55% of Canby's BIPOC households live in rental housing compared with 33% of white households." HPS, p. 25. The vague nature of this demographic generalization risks placement of a diverse pool of the City's residents into a class of renters, and is the basis for inconsistencies in how the BIPOC is reflected in the HPS discussion of Demographic Benefits and Burdens beginning at HPS, p. 26. Strategy G indirectly benefits BIPOC residents, "given the fact that 55%... are currently renters, and this style of development is likely to increase the housing choices available to renters." HPS, p. 37. Immediately thereafter, Strategy H claims to directly benefit BIPOC residents "because of the increased opportunity for the development of multi-family residential housing, likely yielding more housing choice for renters (55% of Canby's BIPOC households live in rental housing...)." HPS, p. 40. Canby can improve the HPS's sensitivity to its BIPOC residents by applying real numbers to this population, and can spatially represent this population within the city to illustrate how strategies address existing BIPOC communities as opposed to the "renter class" as a whole.

The HPS fails to address the lack of owner-occupied housing options for residents below 50% MFI, with HPS, Exhibit 5 illustrating that the City is not pursuing homeownership opportunities for low or very low-income residents. HPS, p. 15. The HPS lacks strategies to directly provide support to low-income residents in homeownership, rather addressing this need through incentives for housing developers (Strategies B and D). Strategy C, "Identify Opportunities to Streamline Planned Unit Developments" threatens to exacerbate this gap, noting in its Demographic Benefits and Burdens section that the strategy could result in "fewer housing units attainable for low-income residents." HPS, p. 29. Elsewhere, the City fails to commit to proposed strategies to address low-income homeownership. Strategy B "Allow Cottage Clusters in Residential Zones" notes it "*could* also provide incentives for development of cottage clusters aimed at lower-income households." HPS, p. 27. At a minimum, the city should commit to this strategy with clear, unconditional language. Other strategies could include working in partnership with housing providers that focus on first time homeownership for affordable housing, particularly if there is any available public land for the development of affordable housing.

3. Mitigation strategies for displacement

The combination of strong housing demand and supply shortage of rentals in Canby, displacement and gentrification is a large concern for the City's residents. Multiple strategies

mention the risk of displacement in the HPS's Implementation Steps section without defining mitigation strategies, including, but not limited to,

- Strategy A, where "this policy could burden BIPOC households with a greater risk of displacement if up-zoning occurs in existing enclaves of affordable housing without mitigation strategies," HPS, p. 25;
- Strategy B, where "the displacement burden of homeless residents could occur in areas where cottage developments are allowed absent mitigation strategies," HPS, p. 28; and
- Strategy C, where "there is a risk of displacement for Canby's older residents to the extent their homes are included in areas identified for PUDs," HPS, p. 30.

We are concerned that there is no explicit and clear mitigation plan for displacement. The City even recognizes these risks. Strategy F "Land Use Permitting Education for Property Owners/Developers" notes its implementation could "reinforce systemic barriers that have historically excluded BIPOC residents from property ownership," while Strategy G "Reduce Minimum Lot Size" notes the strategy could "run the risk of displacement of Canby's communities of color in areas where minimum lot sizes are reduced." HPS, pp. 36 and 38.

We recommend that Canby use their analysis for Contextualized Housing Need and apply it to strategy and policy. HPS, p. 59. The analysis identifies populations most vulnerable to displacement, but the research needs to connect to policy to more explicitly address how the City will mitigate displacement through clear and objective strategies.

The City should also commit to strategies targeting the development of housing for historically marginalized communities that are addressed in the HPS. One notable example occurs in Strategy D, where the City notes it "*could* provide incentives to a non-profit developer whose focus is providing homes to Latinx residents." HPS, p. 32. But, again the HPS only uses aspirational language in this strategy.

4. Timeline of HPS Strategies

Consistently, HPS "Timeframes" reflect a lack of urgency and precision regarding the implementation of the proposed strategies. Post-approval, the state requires mid-point checkpoints occurring every 3-4 years to assess the success of strategies. Assuming approval in 2026, what strategies will see actual housing impacts by 2029/2030? Of the 14 strategies proposed, only 3 strategies (B, E, and I) are projected to impact housing by this time. While no City should claim to resolve its housing crisis overnight, the degree to which Canby postpones the expected impacts of its policy plan is troubling.

Part of this cautious estimation can be attributed to the vague assessment of strategies' "impact." Strategy F, which provides information to property owners and developers, includes a three year gap between implementation (2030) and its estimated housing impacts (2033). Strategies C and D, while theoretically operating in tandem to identify streamlining and financial incentive opportunities in PUDs, operate on different timelines and identify disparate impacts. Vagaries in impacts reflect Recommendation 3's critique of a lack of transparency in tying impacts to the City's demographic analysis.

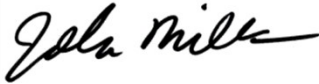
We ask the City to re-think its strategies and impact assessment in light of the housing emergency that presently exists, and to treat this HPS as a means to stop the bleeding.

5. The HPS conflates state requirements with strategies

Strategy B "Allow Cottage Clusters in Residential Zones" and Strategy I "Update Residential Zones" implement existing state statutory requirements, respectively the allowance of cottage clusters and manufactured housing by right in residential zones. While these state statutes are meaningful interventions to address housing choice and affordability, Canby's obligation to implement these strategies should and is independent of the Housing Production Strategy.

HLA and FHCO encourage DLCD send the HPS back to the City for further consideration or to approve with conditions or require further revision to the City's HPS for the City to correct its demographic inconsistencies, commit to policies that will mitigate displacement as well as implement more urgent timelines for strategies, to not conflate state requirements with HPS strategies, and finally to re-evaluate its analysis and strategies in accordance with the statewide requirement to affirmatively further fair housing.

Please provide written notice of your decision to, FHCO, c/o Shyle Ruder, at 1221 SW Yamhill Street, #305, Portland, OR 97205 and HLA, c/o Jennifer Bragar, at 121 SW Morrison Street, Suite 1850, Portland, OR 97204. Thank you for your consideration.



John Miller, Executive Director
Fair Housing Council of Oregon



Jennifer Bragar, President
Housing Land Advocates

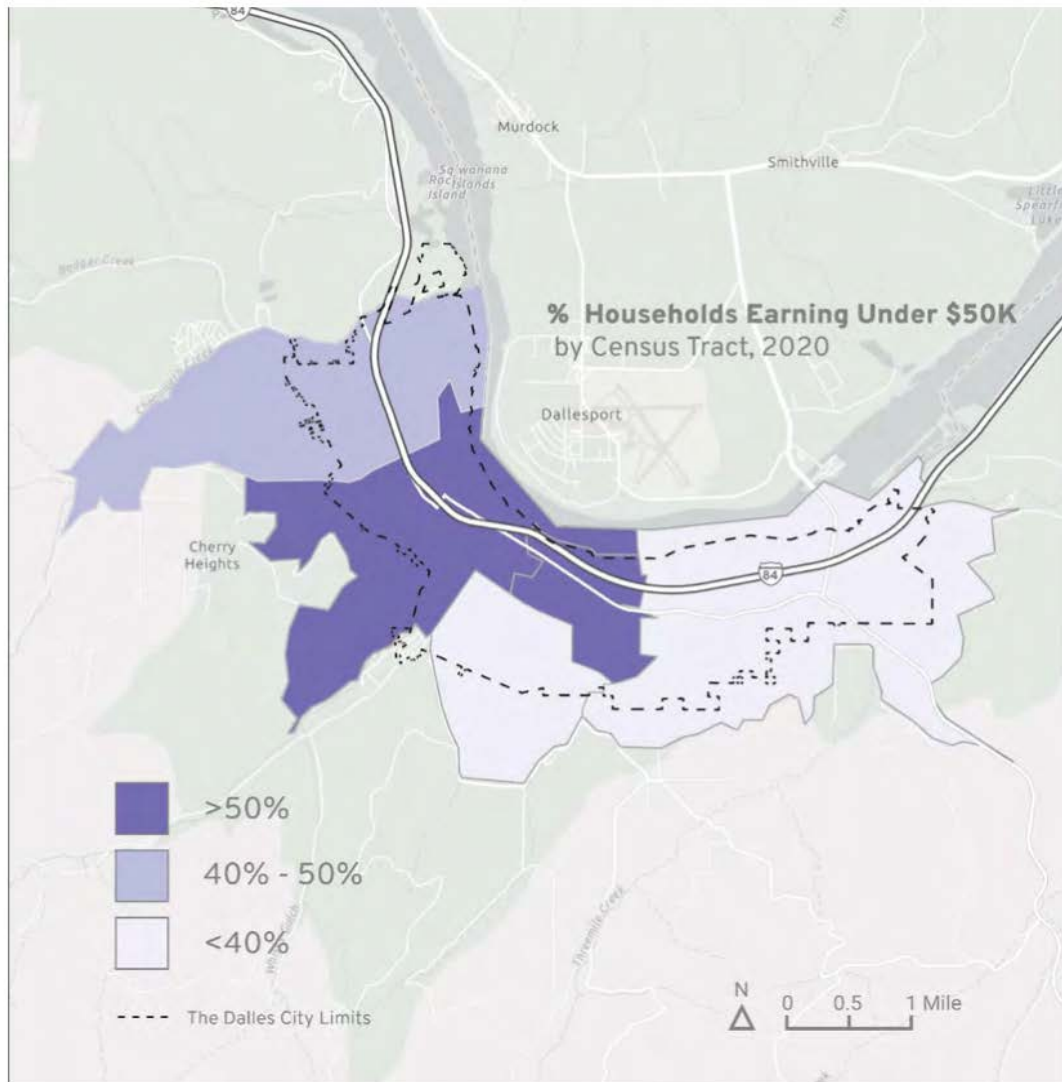
Enclosure

cc: HLA Board (by email)

Attachment The Dalles Model Maps

See following pages

Map 1. Households Earning Under \$50,000 (Census Tract, 2020)



Map 2. Percentage of Renter Households (Census Block Group, 2020)

